

## EMPLOYEE AND CONTRACTOR DATA PROTECTION NOTICE

Effective: 1 August 2025

### I. INTRODUCTION

The legal entity named on the contract of employment of the Employee, or the engagement of the Contractor (the “**Company**”) has prepared this Employee and Contractor Data Protection Notice (“**Notice**”) to outline its practices regarding the collection, use, storage, transfer and other processing of individually identifiable information about Employees or Contractors (“**Personal Data**”). For the purposes of this Notice, “**Employee**” means any individual who is, or has been employed by the Company. For the purposes of this Notice, “**Contractor**” means any individual who is engaged to provide services to the Company and who is not an employee of the Company or a non-executive director of the Company. If you are a Contractor, the terms of this Notice do not create an employment relationship between you and the Company. The Company may also provide to Employees and Contractors additional data protection or privacy notices from time to time.

In the event this Notice is provided to an Employee or Contractor in a language other than English, any discrepancy, conflict or inconsistency between the two language versions shall be resolved in favour of the English version, subject to applicable law.

### II. PERSONAL DATA COLLECTION AND PURPOSES OF USE

Good employment and engagement practices and the effective running of our business require the Company to collect, use, store, transfer and otherwise process certain Personal Data.

The Company collects Personal Data that is directly relevant to its business, required to meet its legal obligations, or otherwise permissible to collect under applicable law. Listed in [Appendix A](#) for Employees and [Appendix B](#) for Contractors of this Notice are the categories of Personal Data that we collect and the purposes for which we use the data that we collect, except where restricted by applicable law. We receive Personal Data from you and from other sources, such as colleagues, managers, referrals and background check providers, and public sources. Certain data listed in this notice may require additional consent which will be obtained prior to the Company collecting the data.

We collect and process Personal Data about you: (i) because we are required or permitted to do so by applicable law, (ii) because such information is necessary to fulfil your contract of employment or engagement with the Company and facilitate your relationship with the Company, (iii) because such information is of particular importance to us and we have a specific legitimate interest under law to process it, (iv) where a public interest requires it, (v) where the Personal Data is necessary for the establishment, exercise or defense of legal claims, or (vi) where necessary to protect the vital interests of you or another person, or (vii) where necessary, we obtain consent of Employees for collection and processing of Personal Data.

If you do not provide certain categories of Personal Data, the Company may not be able to accomplish some of the purposes outlined in this Notice and the issue may need to be escalated to Human Resources to deal with as appropriate.

### **SENSITIVE PERSONAL DATA**

The Company may collect and process certain special categories of Personal Data (“**Sensitive Personal Data**”) about Employees, Contractors, or dependents where required by or permitted under applicable law, where necessary for the establishment, exercise or defence of legal claims, or, where necessary, the Employee or Contractor has provided their explicit consent. Subject to applicable law, the Company may process information about:

- physical and/or mental health for the purposes of benefits administration and addressing workplace health, safety and accommodation issues
- criminal charges/convictions or unlawful behaviour for recruitment and employment screening purposes and for registration and licensing requirements
- work-related illnesses or injuries for the purpose of complying with legal obligations (or assessing entitlements)
- sexual orientation, race and/or ethnic origin, physical and/or mental health, religious beliefs for purposes of reporting on opportunity and inclusion statistics, complying with government reporting requirements, and/or other legal obligations
- biometric data, such as fingerprints and iris scans, for the purposes of electronic identification, authentication and corporate security, at secured Company premises, or to otherwise comply with applicable law
- trade union affiliation

For further information on the purposes of using the above data, please also reference [Appendix A](#) for Employees and [Appendix B](#) for Contractors.

### **PERSONAL DATA ABOUT FAMILY MEMBERS AND FRIENDS**

If an Employee or Contractor provides the Company with Personal Information about members of their family and/or other dependents and friends (e.g., for emergency contact, benefits administration purposes and volunteering), it is that Employee’s or Contractor’s responsibility to inform such individuals and obtain agreement that their data can be shared with the Company. Should the individual have any questions, please refer them to this Data Protection Notice and Section IX for contact information.

If you are sharing information for an individual who is based in EEA, Switzerland or UK please provide them with a copy of the EMEA Regional [Data Protection Notice](#).

### **III. COOKIES**

Non-essential and essential cookies are collected on some websites and mobile applications that the Company uses. Please refer to the following [policy](#).

### **IV. ACCESS BY COMPANY PERSONNEL**

Where permitted by applicable law, access to Personal Data is restricted to those individuals who need such access for the purposes listed in this notice and [Appendix A](#) for Employees and [Appendix B](#) for Contractors, including but not limited to members of the Human Resources Department and the managers in the Employee's or Contractor's line of business, and to authorised representatives of the Company's internal control functions such as Compliance, Chief Administrative Office, Information Security, Corporate Security, Audit and Legal. Access may also be granted on a strict need-to-know basis to others where permitted by applicable law. Access to the employee/contractor individual shared drive is provided to direct managers for 30 days post-termination.

## V. DISCLOSURE

To the extent permitted by applicable law and as appropriate to achieve the purposes described in this Notice, Personal Data may be disclosed by the Company as follows:

Given the global nature of the Company's activities, the Company may (subject to applicable law) transmit Personal Data, including Sensitive Personal Data, to other Company affiliates or operations located in other jurisdictions, including the United States or other jurisdictions where data protection laws may not provide an equivalent level of protection to the laws in the Employee's or Contractor's home jurisdiction. A listing of affiliates belonging to the Bank of America Corporation group can be provided upon request using the contact information provided in the Questions section of this notice.

The Company may disclose in accordance with applicable law relevant Personal Data to certain third parties in connection with the provision of services to the Company. Where the processing of Personal Data is delegated to a third party data processor, such as those listed in [Appendix A](#) for Employees and [Appendix B](#) for Contractors, the Company will delegate such processing in writing, will choose a data processor that provides sufficient guarantees with respect to technical and organizational security measures, such as data protection and information security requirements, governing the relevant processing and will ensure that the processor acts on the Company's behalf and under the Company's instructions.

Personal Data also may be disclosed, where permitted by applicable law, in connection with a corporate restructuring, sale, or assignment of assets, merger, divestiture, or other changes of the financial status of the Company or any of its subsidiary or affiliated companies. Personal Data also may be released to protect the vital interests of Employees and Contractors, to protect the legitimate interests of the Company (unless this would prejudice the rights and freedoms or interests of the Employee or Contractor), or in the Company's judgement to comply with applicable legal or regulatory obligations and regulatory inquiries or requests.

## VI. SECURITY

The Company maintains appropriate technical and organizational measures designed to protect against unauthorised or unlawful processing of Personal Data and/or against accidental loss, alteration, disclosure or access, or accidental or unlawful destruction of or damage to Personal Data. This is documented in the [Information Security Monitoring Notice](#) which you should read in conjunction with this Notice.

## **VII. ACCESS, PORTABILITY, RECTIFICATION AND SUPPRESSION, LIMITATION AND RESTRICTION OF PROCESSING AND ACCURACY OF PERSONAL DATA**

Employees and Contractors are entitled to access Personal Data held about them (with the exception of any documents that are subject to legal privilege, that provide Personal Data about other Employees or Contractors, or that otherwise are not subject to data subject access rights). Any Employee or Contractor who wishes to access their Personal Data or (where permitted under applicable law) request portability of their data should contact a member of the Human Resources Department using the contact information set out in Section IX below.

To the extent required by applicable law, Employees and Contractors have the right to have inaccurate data corrected or removed (at no charge to the Employee or Contractor and at any time) or to limit or restrict processing of their data.

To assist the Company in maintaining accurate Personal Data, Employees and Contractors must ensure they keep their Personal Data up to date on the Company's Global HR system. In the event that the Company becomes aware of any inaccuracy in the Personal Data it has recorded, it will correct that inaccuracy at the earliest practical opportunity.

- To the extent available under applicable law, Employees and Contractors may also have the following rights (including but not limited to): to request a copy of Personal Data held by the Company (as part of an access request above); to request further information or complain about the Company's practices and processes regarding their Personal Data to object to, withdraw consent to, restrict, or request discontinuance of collection, use, disclosure and other processing of their Personal Data as described in this Notice and to request deletion of such Personal Data by the Company.

For all inquiries, Employees and Contractors should contact a member of the Human Resources Department using the contact information set out in Section IX below. Under applicable law, in certain circumstances, the Company may be exempt from or entitled to refuse the above requests or rights. Certain additional terms and conditions may be applicable to process requests or rights, such as requiring communications to be in writing or requiring proof of identity.

## **VIII. MODALITIES OF THE PROCESSING AND DATA RETENTION**

The Company does not use automated decision making on Employee or Contractor processes. 'Automated decision-making' is the process of making a decision by automated means without any human involvement.

Collection, use, disclosure, transfer and other processing, including storage, of Personal Data may be by electronic or manual means, including by hard-copy or soft-copy documents or other appropriate technology. Personal Data may be stored in an Employee's or Contractor's home jurisdiction and/or other jurisdictions in which the Company has operations.

The Company will maintain Personal Data for as long as it is required to do so by applicable law(s) or for as long as necessary for the purpose(s) of use and processing in Section II, whichever is longer ("the retention period"). Any maximum storage term set forth by applicable law will prevail.

The Company will delete Personal Data after the applicable retention period. The retention periods for each type of data and jurisdiction are outlined on the Global Records Retention Schedule found on the [Global Records Management page on Flagscape](#). Retention requirements are available upon request for new Employees and Contractors who do not yet have access to the internal site.

- The criteria used to determine our retention periods include: As long as we have an ongoing relationship with the Employee or Contractor; As required by a legal obligation to which we are subject; As advisable in light of our legal position (such as in regard of applicable statutes of limitations, litigation, or regulatory investigations); and the time period necessary to achieve the purpose of use and processing.

## IX. QUESTIONS

Should any Employee or Contractor have any questions, concerns or complaints about this Notice, please contact the Data Protection Officer using the contact details below. For individual rights, please contact the Human Resources Service Centre via [hrsc.apac@bofa.com](mailto:hrsc.apac@bofa.com) or by phone at **00800.2722.4772** or **+65.6591.1166**.

In certain countries, if you have additional queries about the way in which the Company processes your Personal Data more broadly you may contact the local Data Protection Officer using the following contact details:

APAC Jurisdictions: [dpo@bofa.com](mailto:dpo@bofa.com)

Employees and Contractors may have the right to lodge a complaint with the local Data Protection authority.

## X. CHANGES TO THIS NOTICE

Should the Company substantially modify the way it collects or uses Personal Data, the type of Personal Data it collects or any other aspect of this Notice, it will notify Employees and Contractors as soon as reasonably possible by reissuing a revised Notice or taking other steps in accordance with applicable laws including conducting impact assessments or obtaining Employee and Contractor consent where required by law.

## XI. JURISDICTION-SPECIFIC CLAUSES

### THAILAND

Please refer to [Appendix A](#) for Employees and [Appendix B](#) for Contractors for more information about the purposes and lawful bases for our collection, use, or disclosure, of your personal data.

## **Consent of the Notice**

I have read the “Employee and Contractor Data Protection Notice”. I expressly and voluntarily consent to the application of its terms regarding the collection, processing, use, and international transfer of my Personal Data (and Sensitive Personal Data) by the Company whilst acknowledging that data protection laws in other jurisdictions to which my Personal Data (and Sensitive Personal Data) is being transferred to may not provide the equivalent level of protection to the laws of my home jurisdiction during and in connection with the course of my employment or engagement.

I confirm that, prior to providing any Personal Data of other individuals to the Company (if applicable), I have duly provided them with all information regarding the processing of their Personal Data and their related rights, as described in the Notice and that I have obtained the explicit (and, where applicable, written or separate) consent of those individuals, where necessary, to the processing of their Personal Data.

Please refer to instructions for how to consent to the Notice.

## Appendix A - Employee

“We” or “our” refer to Bank of America legal entities that are data controllers; “you” or “yours” refer to employees.

The table below contains the purpose for which we may process your Personal Data, the types of processing activities that may take place and the category of personal information that would be used for such processing as well as the legal basis for the processing. More information is listed below the table about the personal information categories.

Purpose	Examples of processing activities	Personal Information Categories	Legal Basis
Recruitment	Recruiting and hiring, which includes the sourcing of talent (internal and external) for open roles, requisition management, screening and selecting, and facilitating the new hire process.	Refer to the <a href="#">Recruitment Data Protection Notice(s)</a> for categories of information collected during Recruitment.	Refer to the <a href="#">Recruitment Data Protection Notice(s)</a> for categories of information collected during Recruitment for Legal Basis
Pay, Compensation, and Benefits	Designing and delivering employee compensation, incentives, and benefits/recognition.	<ul style="list-style-type: none"> <li>• Associate Investment Information</li> <li>• Benefits Records</li> <li>• Car registration</li> <li>• Compensation Information</li> <li>• Confidential Unique Identifiers</li> <li>• Employment Disciplinary Record</li> <li>• Employment Information</li> <li>• Financial Account Information</li> <li>• Health Information and veteran and disability status to manage Leaves of Absence</li> <li>• Information you provide about Family and Friends (dependents)</li> <li>• Job Information</li> <li>• Life Events Additional Documentation</li> <li>• Personal Contact Information</li> <li>• Retirement/Pension Planning</li> <li>• Signatures</li> <li>• Tax Information</li> <li>• Work Performance/ Development Information</li> <li>• Timekeeping/ Attendance/ Absence Data</li> <li>• Visa/Citizenship Information</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for performance of a contract</li> <li>• Legal compliance</li> <li>• Legitimate interest</li> </ul>

Purpose	Examples of processing activities	Personal Information Categories	Legal Basis
Employee Learning	Building required skills in the workforce via needs assessments, deployment and delivery of learning solutions, and skill adoption and measurement.	<ul style="list-style-type: none"> <li>• Employment Information</li> <li>• Photo/ Video/ Voice Recording</li> <li>• Job Information</li> <li>• Personal Contact Information</li> <li>• Skills and Qualifications</li> <li>• Timekeeping/ Attendance/ Absence Data (i.e., leave of absence status)</li> <li>• Virtual or In Person Events Data</li> <li>• Work Performance/ Development Information</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for performance of a contract</li> <li>• Legal Compliance</li> <li>• Legitimate interest</li> </ul>
Talent and Performance Management	Providing training and short- and long-term development as well as the activities for managing an employee’s performance including establishing performance plans, monitoring, and reviewing performance, counselling employees. Also includes processes related to employee licensing and certifications.	<ul style="list-style-type: none"> <li>• Opportunity and Inclusion Data</li> <li>• Employment Disciplinary and Investigations Record</li> <li>• Employment Information</li> <li>• Job Information</li> <li>• Skills and Qualifications</li> <li>• Swipe card entry data</li> <li>• Talent and Succession Planning Data</li> <li>• Timekeeping/ Attendance/ Absence Data</li> <li>• Work Performance/ Development Information</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for performance of a contract</li> <li>• Legal compliance</li> <li>• Consent</li> <li>• Legitimate interest</li> </ul>
Employee Support	<p>Employee and labour relations, including investigations into concerns, support for life events, relocations, immigration, relocation-related tax reporting, the resolution of pay and benefits escalations, support for HR tools and information, engagement in Employee Networks, and information for the Alumni Network.</p> <p>*Personal information that you provide as an employee may be used to provide you with benefits and services of the Alumni Network if you become a member in the future.</p>	<ul style="list-style-type: none"> <li>• Benefits Records</li> <li>• Business Travel Information</li> <li>• Compensation Information</li> <li>• *Confidential Unique Identifiers</li> <li>• Opportunity and Inclusion Data</li> <li>• Employment Disciplinary and Investigations Record</li> <li>• *Employment Information</li> <li>• *Financial account information</li> <li>• Health Information</li> <li>• Information you provide about Friends &amp; Family (i.e., emergency contact information)</li> <li>• *Job Information</li> <li>• Outside Business Activities</li> <li>• *Personal Contact Information</li> <li>• *Retirement/Pension Planning</li> <li>• Signatures</li> <li>• Skills and Qualifications</li> <li>• Swipe card entry data</li> <li>• Tax Information</li> <li>• Timekeeping/ Attendance/ Absence Data</li> <li>• Visa/ Citizenship Information</li> <li>• Work Performance/ Development Information</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for performance of a contract</li> <li>• Legal compliance</li> <li>• Legitimate interest</li> </ul>

<b>Purpose</b>	<b>Examples of processing activities</b>	<b>Personal Information Categories</b>	<b>Legal Basis</b>
Workforce Analytics and Reporting	Forecasting human capital needs and managing metrics concerning Workforce information.	<ul style="list-style-type: none"> <li>• Compensation information</li> <li>• Opportunity and Inclusion Data</li> <li>• Employee engagement survey</li> <li>• Employment Information</li> <li>• Job Information</li> <li>• Personal Contact Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interest</li> </ul>
Real Estate Facilities Management	Administering and providing operational support for all firm facilities, including leases, occupancy and space support services, and energy management. Also includes procuring and disposing of facilities, providing geographical oversight, and managing construction projects.	<ul style="list-style-type: none"> <li>• Job Information</li> <li>• Timekeeping/ Attendance/Absence Data (i.e., Leave of Absence status and shift assignment (1st, 2nd, 3rd) for space management)</li> <li>• Signatures</li> <li>• Swipe card entry data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for performance of a contract</li> <li>• Legitimate Interest</li> </ul>
Security, Safety, and Health Operations	Activities related to the placement, maintenance, monitoring, management, and reporting on the physical safeguards to ensure security and safety for facilities, employees and clients and customers.	<ul style="list-style-type: none"> <li>• Accident and Incident Reporting</li> <li>• Employment Information</li> <li>• Photo/ Video/ Voice Recording</li> <li>• Information you provide about Family and Friends (emergency contacts)</li> <li>• Job Information</li> <li>• Swipe card entry data</li> <li>• Health information, as necessary to promote the health and safety of the workforce and visitors to our facilities</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for performance of a contract</li> <li>• Legitimate Interest</li> </ul>
Enterprise Support Services	Supporting business and operational needs, including corporate communications, mail services, document destruction, and corporate hospitality and travel.	<ul style="list-style-type: none"> <li>• Business Travel Information</li> <li>• Job Information</li> <li>• Personal Contact Information</li> <li>• Photo (e.g., Connections photo used in Skype, email, and other applications for personalization)</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interest</li> </ul>
Access and Identity Management	Managing internal and external technology infrastructure access.	<ul style="list-style-type: none"> <li>• Biometrics for authentication</li> <li>• Employment Information</li> <li>• Geolocation information, GPS information, IP address information</li> <li>• Photo/ Video/ Voice Recording</li> <li>• Job Information</li> <li>• Technical Information</li> <li>• Confidential Unique Identifiers (i.e., date of birth for authentication)</li> </ul>	<ul style="list-style-type: none"> <li>• Legal Compliance</li> <li>• Legitimate Interest</li> <li>• Consent (collected within the Identity Verification app)</li> </ul>
Technology Infrastructure and Operations Management	Operating and maintaining the technical infrastructure for hosting applications, including the hardware, operating systems, physical plant, and network connectivity for all computing platforms. Also includes processes for incident management impacting operations.	<ul style="list-style-type: none"> <li>• Employment Information</li> <li>• Job Information</li> <li>• Technical Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legal Compliance</li> <li>• Legitimate Interest</li> </ul>

<b>Purpose</b>	<b>Examples of processing activities</b>	<b>Personal Information Categories</b>	<b>Legal Basis</b>
Information Security, Privacy, and Cyber Threat and Incident Management	Monitoring for and management of information security, privacy, and cyber threats and incidents.	<ul style="list-style-type: none"> <li>Any of the information listed below in The Categories of Personal Data we may Collect section along with Location Information: geolocation information, GPS information, IP address information may be used for this purpose in accordance with the relevant Information Security Monitoring Notice unless restricted by applicable law.</li> </ul>	<ul style="list-style-type: none"> <li>Legal Compliance</li> <li>Legitimate Interest</li> </ul>
Business Continuity, Resiliency and Response	Establishing, maintaining, and testing plans to recover from disruptions in the businesses' ability to operate caused by natural or man-made disasters.	<ul style="list-style-type: none"> <li>Information you provide about Family and Friends (emergency contacts)</li> <li>Job Information</li> <li>Personal Contact Information</li> </ul>	<ul style="list-style-type: none"> <li>Necessary for performance of a contract</li> <li>Legitimate interest</li> </ul>
Marketing Strategy	Identifying marketing strategies and segments, the strategies for advertising, promotional campaigns, publication, and distribution of marketing materials across channels (including social media).	<ul style="list-style-type: none"> <li>Photo/ Video/ Voice Recording</li> <li>Job Information</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Legitimate Interest</li> </ul>
Manage Customer and Client Relationships	Managing the customer and client relationship through operations meetings, identifying sales opportunities, providing services, and / or managing portfolios.	<ul style="list-style-type: none"> <li>Photo/ Video/ Voice Recording</li> <li>Job Information</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Legitimate Interest</li> </ul>
Business Travel, Meeting Services and Events	Activities related to the development and management of centralized or geographical strategy and operations through third party for business travel, meeting services and events for legal entities or organization.	<ul style="list-style-type: none"> <li>Business Travel Information</li> <li>Compensation Information</li> <li>Confidential Unique Identifiers</li> <li>Financial Account Information (employee expense reimbursement)</li> <li>Photo/ Video/ Voice Recording</li> <li>Information you provide about Family and Friends (if they are attending events)</li> <li>Job Information</li> <li>Personal Contact Information</li> <li>Signatures</li> <li>Skills and Qualifications</li> <li>Tax Information</li> <li>Virtual or In Person Events Data</li> <li>Visa/ Citizenship Information</li> </ul>	<ul style="list-style-type: none"> <li>Legal Compliance</li> <li>Consent</li> <li>Legitimate interest</li> </ul>
Manage Social Responsibility: Activities	Managing the Corporate Social Responsibility Program as per legal entity or organization goals and geographical requirements, including administering volunteer and giving programs.	<ul style="list-style-type: none"> <li>Financial Account Information (voluntary payroll deductions)</li> <li>Job Information</li> <li>Photo/Video</li> <li>Virtual or In Person Events Data</li> </ul>	<ul style="list-style-type: none"> <li>Legal Compliance</li> <li>Legitimate Interest</li> </ul>

<b>Purpose</b>	<b>Examples of processing activities</b>	<b>Personal Information Categories</b>	<b>Legal Basis</b>
Employee Registration and Licensing and Certifications	Activities related to capturing (documentary evidence) professional credentials (registrations, licenses, and certifications) and ensuring they are current and compliant with applicable laws and regulations.  Adhering to registration requirements*	<ul style="list-style-type: none"> <li>• Confidential Unique Identifiers</li> <li>• Employment Information</li> <li>• Job Information</li> <li>• Life Event Documentation (arrest &amp; criminal documentation, court/legal documentation)</li> <li>• Outside Business Activities</li> <li>• Securities and Stock Trading</li> <li>• Skills and Qualifications</li> <li>• Personal Contact Information</li> <li>• *Fingerprinting (applicable countries only)</li> </ul>	<ul style="list-style-type: none"> <li>• Legal Compliance</li> <li>• Necessary for performance of a Contract</li> <li>• *Consent</li> </ul>
Background Re-screening	Conducting re-screening for existing employees when required for regulatory purposes, e.g., fit and proper, and licensing and registration.	<ul style="list-style-type: none"> <li>• Confidential Unique Identifiers</li> <li>• Life Event Documentation (arrest &amp; criminal documentation, court/legal documentation)</li> <li>• Outside Business Activities</li> <li>• Personal Contact Information</li> <li>• Signatures</li> <li>• Skills and Qualifications</li> <li>• Tax Information</li> <li>• Work eligibility status</li> </ul>	<ul style="list-style-type: none"> <li>• Compliance with a Legal Obligation</li> </ul>
Management of Compliance and Operational Risk	Processes related to managing compliance, operational, third party, reputational, and strategic risks.	<ul style="list-style-type: none"> <li>• Any of the information listed below in The Categories of Personal Data we may Collect section may be used for these purposes unless restricted by applicable law</li> </ul>	<ul style="list-style-type: none"> <li>• Legal Compliance</li> <li>• Necessary for performance of a Contract</li> </ul>
Management of Compliance and Operational Risk	Monitoring and managing regulated employees' compliance with applicable laws, rules, regulations and Company policies.	<ul style="list-style-type: none"> <li>• Any of the information listed below in The Categories of Personal Data we may Collect section may be used for these purposes, in accordance with the relevant monitoring notice, unless restricted by applicable law</li> </ul>	<ul style="list-style-type: none"> <li>• Compliance with a Legal Obligation (key statues are listed in the applicable monitoring notice)</li> <li>• Legitimate Interest</li> <li>• Consent</li> </ul>
Management of Compliance and Operational Risk	Assessing adherence to Outside Business Activities – Enterprise Policy requirements and evaluating actual or perceived conflicts of interest.	<ul style="list-style-type: none"> <li>• Outside Business Activities Information</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> </ul>
Management of Compliance and Operational Risk	Assessing adherence to Associate Investment Monitoring requirements and evaluating actual or perceived conflicts of interest.	<ul style="list-style-type: none"> <li>• Associate Investment Information</li> </ul>	<ul style="list-style-type: none"> <li>• Consent</li> </ul>

Purpose	Examples of processing activities	Personal Information Categories	Legal Basis
Non-Financial Regulatory Reporting	Managing production and distribution of Non-Financial Reporting to meet regulatory requirements.	<ul style="list-style-type: none"> <li>Any of the information listed below in The Categories of Personal Data We May Collect section may be used for these purposes unless restricted by applicable law</li> </ul>	<ul style="list-style-type: none"> <li>Legal Compliance</li> <li>Necessary for performance of a Contract</li> </ul>
Whistleblowing Investigations	Reviewing Personal Information provided by a whistleblower and information collected as part of an investigation into a whistleblowing concern and any follow up that is required.	<ul style="list-style-type: none"> <li>Any of the information listed below in The Categories of Personal Data We May Collect section may be used for these purposes unless restricted by applicable law</li> </ul>	<ul style="list-style-type: none"> <li>Legal Compliance</li> <li>Necessary for performance of a Contract</li> </ul>
Legal Support	Legal advice and counsel required to support the business as well as publication of all legal and tax reporting requirements.	<ul style="list-style-type: none"> <li>Any of the information listed below in The Categories of Personal Data We May Collect section may be used for these purposes unless restricted by applicable law</li> </ul>	<ul style="list-style-type: none"> <li>Legal Compliance</li> <li>Necessary for performance of a Contract</li> </ul>
Internal Audits	Performing independent assessments of the company's internal controls.	<ul style="list-style-type: none"> <li>Any of the information listed below in The Categories of Personal Data We May Collect section may be used for these purposes unless restricted by applicable law</li> </ul>	<ul style="list-style-type: none"> <li>Legal Compliance</li> <li>Necessary for performance of a Contract</li> </ul>

**The Categories of Personal Data We May Collect, Use, Transfer and Disclose, unless restricted by applicable law:**

- **Accident and Incident Reporting** (Sensitive Personal Information)
- **Associate Investment Information:** Details of personal investment accounts of employee and/or the employee's Affiliates (a family member, such as a spouse, domestic partner or children who live with the employee or any other person who is financially dependent upon the employee) to ensure they are compliant with applicable laws and regulations. Includes: Investment Firm name, Investment Account number, Investment Account Transaction Reports or Statements, and Securities and stock trading activity.
- **Benefits Records:** Enrolment and administration of benefits e.g., Health cover, Life Assurance, reimbursement information, family/marital status, dependent information, medical accommodations, car lease information (applicable countries only)
- **Biometrics** for authentication and to comply with applicable laws in relation to employee screening (Sensitive Personal Information)
- **Business Travel Information:** Visa details, Frequent Flyer ID, travel logs, and itineraries
- **Compensation Information:** Previous and current compensation, base salary, market rates, incentive payment(s), stock options and allowances
- **Confidential Unique Identifiers:** Date and place of birth, copy(ies) of birth certificate, birth surname and any other former names, National ID card, National ID, Social insurance number or other tax identifier number, MyNumber

- **Opportunity and Inclusion Data:** Race\*, ethnicity\*, veteran status, age, disability status, sexual orientation\*, gender, gender identity, and gender expression. (\*Sensitive Personal Information). Use of Opportunity and Inclusion Data outside of legitimate HR purposes is anonymous.
- **Employment Disciplinary Record:** Information pertaining to any grievances raised, activities and investigations
- **Employment Disciplinary and Investigations Record:** Information pertaining to any disciplinary grievances and/or concerns raised, activities and investigations
- **Employee engagement survey:** Results are reported anonymously
- **Employment Information:** Employment dates, termination details, query management records, flexible working requests, employee standing (e.g., Good Standing status), Bank/Trade Union
- **Financial Account Information:** Bank account details, payroll payments and deductions and other financial information
- **Fingerprinting Data** (applicable countries only): relevant identification data (name, employee ID number, CRD number, date and place of birth) and other characteristics (height, weight, sex, hair and eye colour (using a three-letter code), Employee signature, employer; biometric data (hard copy fingerprints) and racial data. This may include criminal convictions and offenses data
- **Health Information:** Information relating to health where relevant to public health or the safety of our facilities and workforce (e.g., COVID test results)
- **Information you provide about Family and Friends:** Dependent full names and date(s) of birth, emergency contact details, name and age of child/children collected through parents or guardians attending events, dietary requirements of individuals attending an event
- **Job Information:** Job title and/or position and description of responsibilities/duties, job family, location, band/seniority, Employee Identifiers (e.g., Person Number), department, line and sub-line of business, local Company entity name, cost centre information, supervisor/manager/team lead name and contact information, reporting structure, work contact information
- **Life Events Additional Documentation:** Medical/diagnosis documentation; personal circumstances; Return to Work Release Documentation; Death Certificate and Death Benefit documentation including beneficiary personal contact information and details; restraining orders, family custody legal/ orders; criminal records; military orders and documentation; personal insurance documentation e.g., house fire/hurricane damage report, health information for Fitness for Duty form, & Medical release of information with provider details (e.g., therapist name), arrest & criminal documentation, Court/legal documentation, Marriage & divorce certificates, Trust or estate documentation & ID numbers, Birth Certificates, sickness certificates.
- **Outside Business Activities:** Details of outside business activities and directorships (where relevant for employment-related purposes)
- **Personal Contact Information:** Address, Telephone, email, full address

- **Photo/ Video/ Voice Recording:** Video recording, CCTV, photograph, voice recording/data
- **Retirement/Pension Planning:** Information related to pension and retirement
- **Securities and Stock Trading:** Activity/experience (where relevant for employment-related purposes)
- **Signatures:** Including digital images and physical copies
- **Skills and Qualifications:** Pre-employment references, employment history, language(s) spoken, reference letters, academic record, professional qualifications and memberships, professional training, company internal training, licenses and certifications, financial regulatory registration, areas of expertise general management experience, leadership behaviour
- **Swipe card entry data**
- **Talent and Succession Planning Data:** Mobility preferences, date assigned to a talent pool, talent pool name and description, strengths, and development needs
- **Tax Information:** Tax contributions, tax forms, e.g., P60 (UK)
- **Technical Information:** Username and passwords, IP address, domain, browser type, operating system click-stream data and system logs, electronic and non-electronic content and documents created or produced by you using Company systems or in the performance of your role with the Company
- **Timekeeping/ Attendance/ Absence Data:** Shift and overtime data, absence details, e.g., sickness, holiday, and leaves of absence, Working Time Directive details
- **Virtual or In Person Events Data:** Speaker biographies, travel details, spouse/partner name, special assistance needs of individuals attending an event, name and age of child/children collected through parents or guardians, dietary requirements of individuals attending an event
- **Visa/ Citizenship Information:** Work eligibility status, entitlement to residency, citizenship, visa details, passport details
- **Work Performance/ Development Information:** Assessments and ratings (results rating, behaviour rating, potential rating), performance goals description, key competencies description, areas for development, coaching notes, feedback from others (e.g., 360), self-assessment description, manager review description, performance expectations, measurement criteria, action dates, manager progress notes, career development information

### Third Parties with Whom We May Share Personal Information

To the extent permitted by applicable law and as appropriate to achieve the purposes described in this Notice, Personal Data may be disclosed by the Company as outlined in the table below and, where applicable, in accordance with Section XI. Jurisdiction Specific Clauses of this Notice.

Type of Recipient	Personal Information Categories
<p><b>Professional Advisors:</b> Accountants, auditors, lawyers, insurers, bankers, tax advisors and other outside professional advisors in all the countries in which the Company operates.</p> <p><b>Service Providers:</b> Companies that provide products and services to the Company in the countries in which the Company operates, such as payroll, partner banks, pension scheme, benefits providers; asset managers that advise or sponsor investment products that the Company distributes to its clients; human resources services, recruitment and training providers; performance management, training, expense management, IT systems suppliers and support; reception and security, catering and logistics services providers, translation services, third parties assisting with event organizing and marketing activities, medical or health practitioners, trade bodies and associations, real estate management, and other service providers. Note: Where appropriate, the Company will offer and receive reasonable assistance from third parties (such as service providers) to respond to data subject access requests.</p>	<p>Personal information is shared, unless restricted by applicable law, with Professional Advisors and Service Providers to the extent they provide services that align with the purposes in the table above. The Personal Information categories shared with Professional Advisors and Service Providers aligns with the services they provide to the Company, including:</p> <ul style="list-style-type: none"> <li>• Accident and Incident Reporting</li> <li>• Benefits Records</li> <li>• Biometrics</li> <li>• Business Travel Information</li> <li>• Compensation Information</li> <li>• Confidential Unique Identifiers</li> <li>• Opportunity and Inclusion Data</li> <li>• Employment Disciplinary and Investigations Record</li> <li>• Employment Information</li> <li>• Financial Account Information</li> <li>• Health Information</li> <li>• Photo/ Video/ Voice Recording</li> <li>• Information you provide about Family and Friends</li> <li>• Job Information</li> <li>• Outside Business Activities</li> <li>• Personal Contact Information</li> <li>• Retirement/Pension Planning</li> <li>• Securities and Stock Trading</li> <li>• Signatures</li> <li>• Skills and Qualifications</li> <li>• Swipe card entry data</li> <li>• Talent and Succession Planning Data</li> <li>• Tax Information</li> <li>• Technical Information</li> <li>• Timekeeping/ Attendance/ Absence Data</li> <li>• Virtual or In Person Events Data</li> <li>• Visa/ Citizenship Information</li> <li>• Work Performance/ Development Information</li> </ul>

<b>Type of Recipient</b>	<b>Personal Information Categories</b>
<p><b>Public and Governmental Authorities:</b> Entities that regulate or have jurisdiction over the Company in the countries in which the Company operates, such as regulatory authorities, law enforcement, public bodies, licensing and registration bodies, judicial bodies and third parties appointed by such authorities.</p>	<ul style="list-style-type: none"> <li>• Accident and Incident Reporting</li> <li>• Business Travel Information</li> <li>• Compensation Information</li> <li>• Opportunity and Inclusion Data (aggregate)</li> <li>• Employment Disciplinary and Investigations Record</li> <li>• Employment Information</li> <li>• Fingerprinting Data (applicable countries only)</li> <li>• Health Information (aggregate)</li> <li>• Photo/ Video/ Voice Recording</li> <li>• Job Information</li> <li>• Outside Business Activities</li> <li>• Retirement/Pension Planning</li> <li>• Securities and Stock Trading</li> <li>• Signatures</li> <li>• Skills and Qualifications</li> <li>• Tax Information (aggregate)</li> <li>• Timekeeping/ Attendance/ Absence Data</li> <li>• Visa/ Citizenship Information</li> </ul>
<p><b>Parties Related to a Corporate Transaction:</b> A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Company’s business, assets or stock (including in connection with any bankruptcy or similar proceedings), e.g., stock exchanges and business counterparties.</p>	<ul style="list-style-type: none"> <li>• Compensation Information</li> <li>• Confidential Unique Identifiers</li> <li>• Employment Information</li> <li>• Job Information</li> <li>• Skills and Qualifications</li> <li>• Talent and Succession Planning Data</li> <li>• Virtual or In Person Events Data</li> <li>• Visa/ Citizenship Information</li> <li>• Work Performance/ Development Information</li> </ul>
<p><b>Bank/Trade Unions:</b> Bank/Trade unions to which the Employees are affiliated.</p>	<ul style="list-style-type: none"> <li>• Employment information</li> <li>• Job Information</li> <li>• Skills and Qualifications</li> </ul>
<p>Current or prospective customers and clients.</p>	<ul style="list-style-type: none"> <li>• Photo/ Video/ Voice Recording</li> <li>• Job Information</li> </ul>
<p><b>Event Vendors:</b> Event vendors, organizers, speakers, volunteers, contractors, and sponsors to facilitate events</p>	<ul style="list-style-type: none"> <li>• Business Travel Information</li> <li>• Photo/ Video/ Voice Recording</li> <li>• Information you provide about Family and Friends (if they are attending events)</li> <li>• Job Information</li> <li>• Personal Contact Information</li> <li>• Virtual or In Person Events Data</li> </ul>
<p><b>Online Tracking providers:</b> To improve technical and design features of our websites and platforms</p>	<ul style="list-style-type: none"> <li>• IP Address</li> </ul>

## Appendix B - Contractors

“We” or “our” refer to Bank of America legal entities that are data controllers; “you” or “yours” refer to contractors.

The table below contains the purpose for which we may process your Personal Data, the types of processing activities that may take place and the category of personal information that would be used for such processing as well as the legal basis for the processing. More information is listed below the table about the personal information categories.

Purpose	Examples of processing activities	Personal Information Categories	Legal Basis
Pay, Compensation	Designing and delivering contractor compensation.	<ul style="list-style-type: none"> <li>• Confidential Unique Identifiers</li> <li>• Employment Information</li> <li>• Financial Account Information</li> <li>• Information you provide about Family and Friends (dependents)</li> <li>• Job Information</li> <li>• Personal Contact Information</li> <li>• Signatures</li> <li>• Skills and Qualifications</li> <li>• Tax Information</li> <li>• Timekeeping/ Attendance/ Absence Data</li> <li>• Visa/Citizenship Information</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for performance of a contract</li> <li>• Legal compliance</li> <li>• Legitimate interest</li> </ul>
Workforce Learning	Building required skills in the workforce via needs assessments, deployment and delivery of learning solutions, and skill adoption and measurement.	<ul style="list-style-type: none"> <li>• Employment Information</li> <li>• Photo/ Video/ Voice Recording</li> <li>• Personal Contact Information</li> <li>• Job Information</li> <li>• Skills and Qualifications</li> <li>• Timekeeping/ Attendance/ Absence Data (i.e., leave of absence status)</li> <li>• Virtual or In Person Events Data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for performance of a contract</li> <li>• Legal Compliance</li> <li>• Legitimate interest</li> </ul>
Workforce Support	Workforce relations, relocations, immigration, relocation-related tax reporting, the resolution of pay escalations, and support for HR tools and information.	<ul style="list-style-type: none"> <li>• Business Travel Information</li> <li>• Opportunity and Inclusion Data</li> <li>• Employment Disciplinary and Investigations Record</li> <li>• Employment Information</li> <li>• Job Information</li> <li>• Outside Business Activities</li> <li>• Personal Contact Information</li> <li>• Signatures</li> <li>• Skills and Qualifications</li> <li>• Swipe card entry data</li> <li>• Tax Information</li> <li>• Timekeeping/ Attendance/ Absence Data</li> <li>• Visa/ Citizenship Information</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for performance of a contract</li> <li>• Legal compliance</li> <li>• Legitimate interest</li> </ul>

<b>Purpose</b>	<b>Examples of processing activities</b>	<b>Personal Information Categories</b>	<b>Legal Basis</b>
Workforce Analytics and Reporting	Forecasting human capital needs and managing metrics concerning Workforce information.	<ul style="list-style-type: none"> <li>• Opportunity and Inclusion Data</li> <li>• Employment Information</li> <li>• Job Information</li> <li>• Personal Contact Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interest</li> </ul>
Real Estate Facilities Management	Administering and providing operational support for all firm facilities, including leases, occupancy and space support services, and energy management. Also includes procuring and disposing of facilities, providing geographical oversight, and managing construction projects.	<ul style="list-style-type: none"> <li>• Job Information</li> <li>• Signatures</li> <li>• Swipe card entry data</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for performance of a contract</li> <li>• Legitimate Interest</li> </ul>
Security, Safety, and Health Operations	Activities related to the placement, maintenance, monitoring, management, and reporting on the physical safeguards to ensure security and safety for facilities, the workforce and clients and customers.	<ul style="list-style-type: none"> <li>• Accident and Incident Reporting</li> <li>• Employment Information</li> <li>• Photo/ Video/ Voice Recording</li> <li>• Information you provide about Family and Friends (emergency contacts)</li> <li>• Job Information</li> <li>• Swipe card entry data</li> <li>• Health information, as necessary to promote the health and safety of the workforce and visitors to our facilities</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for performance of a contract</li> <li>• Legitimate Interest</li> </ul>
Enterprise Support Services	Supporting business and operational needs, including corporate communications, mail services, document destruction, and corporate hospitality and travel.	<ul style="list-style-type: none"> <li>• Business Travel Information</li> <li>• Job Information</li> <li>• Personal Contact Information</li> <li>• Photo (e.g., Connections photo used in Skype, email, and other applications for personalization)</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interest</li> </ul>
Access and Identity Management	Managing internal and external technology infrastructure access.	<ul style="list-style-type: none"> <li>• Biometrics for authentication</li> <li>• Employment Information</li> <li>• Geolocation information, GPS information, IP address information</li> <li>• Photo/ Video/ Voice Recording</li> <li>• Job Information</li> <li>• Technical Information</li> <li>• Confidential Unique Identifiers (i.e., date of birth for authentication)</li> </ul>	<ul style="list-style-type: none"> <li>• Legal Compliance</li> <li>• Legitimate Interest</li> <li>• Consent (collected within the Identity Verification app)</li> </ul>
Technology Infrastructure and Operations Management	Operating and maintaining the technical infrastructure for hosting applications, including the hardware, operating systems, physical plant, and network connectivity for all computing platforms. Also includes processes for incident management impacting operations.	<ul style="list-style-type: none"> <li>• Employment Information</li> <li>• Job Information</li> <li>• Technical Information</li> </ul>	<ul style="list-style-type: none"> <li>• Legal Compliance</li> <li>• Legitimate Interest</li> </ul>

<b>Purpose</b>	<b>Examples of processing activities</b>	<b>Personal Information Categories</b>	<b>Legal Basis</b>
Information Security, Privacy, and Cyber Threat and Incident Management	Monitoring for and management of information security, privacy, and cyber threats and incidents.	<ul style="list-style-type: none"> <li>Any of the information listed below in The Categories of Personal Data we may Collect section along with Location Information: geolocation information, GPS information, IP address information may be used for this purpose in accordance with the relevant Information Security Monitoring Notice unless restricted by applicable law.</li> </ul>	<ul style="list-style-type: none"> <li>Legal Compliance</li> <li>Legitimate Interest</li> </ul>
Business Continuity, Resiliency and Response	Establishing, maintaining, and testing plans to recover from disruptions in the businesses' ability to operate caused by natural or man-made disasters.	<ul style="list-style-type: none"> <li>Information you provide about Family and Friends (emergency contacts)</li> <li>Job Information</li> <li>Personal Contact Information</li> <li>Signatures</li> <li>Tax Information</li> </ul>	<ul style="list-style-type: none"> <li>Necessary for performance of a contract</li> <li>Legitimate interest</li> </ul>
Marketing Strategy	Identifying marketing strategies and segments, the strategies for advertising, promotional campaigns, publication, and distribution of marketing materials across channels (including social media).	<ul style="list-style-type: none"> <li>Photo/ Video/ Voice Recording</li> <li>Job Information</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Legitimate Interest</li> </ul>
Manage Customer and Client Relationships	Managing the customer and client relationship through operations meetings, identifying sales opportunities, providing services, and / or managing portfolios.	<ul style="list-style-type: none"> <li>Photo/ Video/ Voice Recording</li> <li>Job Information</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Legitimate Interest</li> </ul>
Business Travel, Meeting Services and Events	Activities related to the development and management of centralized or geographical strategy and operations through third party for business travel, meeting services and events for legal entities or organization.	<ul style="list-style-type: none"> <li>Business Travel Information</li> <li>Confidential Unique Identifiers</li> <li>Photo/ Video/ Voice Recording</li> <li>Information you provide about Family and Friends (if they are attending events)</li> <li>Job Information</li> <li>Personal Contact Information</li> <li>Virtual or In Person Events Data</li> <li>Visa/ Citizenship Information</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> <li>Legitimate interest</li> </ul>
Workforce Registration and Licensing and Certifications	Activities related to capturing (documentary evidence) professional credentials (registrations, licenses, and certifications) and ensuring they are current and compliant with applicable laws and regulations.	<ul style="list-style-type: none"> <li>Confidential Unique Identifiers</li> <li>Employment Information</li> <li>Job Information</li> <li>Outside Business Activities</li> <li>Securities and Stock Trading</li> <li>Skills and Qualifications</li> </ul>	<ul style="list-style-type: none"> <li>Legal Compliance</li> <li>Necessary for performance of a Contract</li> </ul>
Workforce Registration and Licensing and Certifications	Adhering to registration requirements	<ul style="list-style-type: none"> <li>Fingerprinting (applicable countries only)</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> </ul>

<b>Purpose</b>	<b>Examples of processing activities</b>	<b>Personal Information Categories</b>	<b>Legal Basis</b>
Management of Compliance and Operational Risk	Processes related to managing compliance, operational, third party, reputational, and strategic risks.	<ul style="list-style-type: none"> <li>Any of the information listed below in The Categories of Personal Data we may Collect section may be used for these purposes unless restricted by applicable law</li> </ul>	<ul style="list-style-type: none"> <li>Legal Compliance</li> <li>Necessary for performance of a Contract</li> </ul>
Management of Compliance and Operational Risk	Monitoring and managing regulated employees' compliance with applicable laws, rules, regulations and Company policies.	<ul style="list-style-type: none"> <li>Any of the information listed below in The Categories of Personal Data we may Collect section may be used for these purposes, in accordance with the relevant monitoring notice, unless restricted by applicable law</li> </ul>	<ul style="list-style-type: none"> <li>Compliance with a Legal Obligation (key statutes are listed in the applicable monitoring notice)</li> <li>Legitimate Interest</li> <li>Consent</li> </ul>
Management of Compliance and Operational Risk	Assessing adherence to Outside Business Activities – Enterprise Policy requirements and evaluating actual or perceived conflicts of interest.	<ul style="list-style-type: none"> <li>Outside Business Activities Information</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> </ul>
Management of Compliance and Operational Risk	Assessing adherence to Associate Investment Monitoring requirements and evaluating actual or perceived conflicts of interest.	<ul style="list-style-type: none"> <li>Associate Investment Information</li> </ul>	<ul style="list-style-type: none"> <li>Consent</li> </ul>
Regulatory Relationships and Exams	Managing regulatory relationships and exams.	<ul style="list-style-type: none"> <li>Any of the information listed below in The Categories of Personal Data We May Collect section may be used for these purposes unless restricted by applicable law</li> </ul>	<ul style="list-style-type: none"> <li>Legal Compliance</li> <li>Necessary for performance of a Contract</li> </ul>
Non-Financial Regulatory Reporting	Managing production and distribution of Non-Financial Reporting to meet regulatory requirements.	<ul style="list-style-type: none"> <li>Any of the information listed below in The Categories of Personal Data We May Collect section may be used for these purposes unless restricted by applicable law</li> </ul>	<ul style="list-style-type: none"> <li>Legal Compliance</li> <li>Necessary for performance of a Contract</li> </ul>
Whistleblowing Investigations	Reviewing Personal Information provided by a whistleblower and information collected as part of an investigation into a whistleblowing concern and any follow up that is required.	<ul style="list-style-type: none"> <li>Any of the information listed below in The Categories of Personal Data We May Collect section may be used for these purposes unless restricted by applicable law</li> </ul>	<ul style="list-style-type: none"> <li>Legal Compliance</li> <li>Necessary for performance of a Contract</li> </ul>
Legal Support	Legal advice and counsel required to support the business as well as publication of all legal and tax reporting requirements.	<ul style="list-style-type: none"> <li>Any of the information listed below in The Categories of Personal Data We May Collect section may be used for these purposes unless restricted by applicable law</li> </ul>	<ul style="list-style-type: none"> <li>Legal Compliance</li> <li>Necessary for performance of a Contract</li> </ul>

Purpose	Examples of processing activities	Personal Information Categories	Legal Basis
Internal Audits	Performing independent assessments of the company's internal controls.	<ul style="list-style-type: none"> <li>Any of the information listed below in The Categories of Personal Data We May Collect section may be used for these purposes unless restricted by applicable law</li> </ul>	<ul style="list-style-type: none"> <li>Legal Compliance</li> <li>Necessary for performance of a Contract</li> </ul>

**The Categories of Personal Data We May Collect, Use, Transfer and Disclose, unless restricted by applicable law:**

- **Accident and Incident Reporting** (Sensitive Personal Information)
- **Associate Investment Information:** Details of personal investment accounts of employee and/or the employee's Affiliates (a family member, such as a spouse, domestic partner or children who live with the employee or any other person who is financially dependent upon the employee) to ensure they are compliant with applicable laws and regulations. Includes: Investment Firm name, Investment Account number, Investment Account Transaction Reports or Statements, and Securities and stock trading activity.
- **Biometrics** for authentication and to comply with applicable laws in relation to workforce screening (Sensitive Personal Information)
- **Business Travel Information:** Visa details, Frequent Flyer ID, travel logs, and itineraries
- **Confidential Unique Identifiers:** Date and place of birth, copy(ies) of birth certificate, birth surname and any other former names, National ID card, National ID, Social insurance number or other tax identifier number, MyNumber
- **Opportunity and Inclusion Data:** Race\*, ethnicity\*, veteran status, age, disability status, sexual orientation\*, gender, gender identity, and gender expression. (\*Sensitive Personal Information). Use of Opportunity and Inclusion Data outside of legitimate HR purposes is anonymous data.
- **Employment Disciplinary and Investigations Record:** Information pertaining to any disciplinary grievances and/or concerns raised, activities and investigations
- **Employment Information:** Employment dates, termination details, query management records, flexible working requests
- **Financial Account Information:** Bank account details, payroll payments and deductions and other financial information
- **Fingerprinting Data** (applicable countries only): relevant identification data (name, employee ID number, CRD number, date and place of birth) and other characteristics (height, weight, sex, hair and eye colour (using a three-letter code), Employee signature, employer; biometric data (hard copy fingerprints) and racial data. This may include criminal convictions and offenses data
- **Health Information:** Information relating to health where relevant to public health or the safety of our facilities and workforce (e.g., COVID test results)

- **Information you provide about Family and Friends:** Emergency contact details, name and age of child/children collected through parents or guardians attending events, dietary requirements of individuals attending an event
- **Job Information:** Job title and/or position and description of responsibilities/duties, job family, location, band/seniority, Employee Identifiers (e.g., Person Number), department, line and sub-line of business, local Company entity name, cost centre information, supervisor/manager/team lead name and contact information, reporting structure, work contact information
- **Outside Business Activities:** Details of outside business activities and directorships (where relevant for employment-related purposes)
- **Personal Contact Information:** Address, Telephone, email, full address
- **Photo/ Video/ Voice Recording:** Video recording, CCTV, photograph, voice recording/data
- **Securities and Stock Trading:** Activity/experience (where relevant for employment-related purposes)
- **Signatures:** Including digital images and physical copies
- **Skills and Qualifications:** Pre-employment references, employment history, language(s) spoken, reference letters, academic record, professional qualifications and memberships, professional training, company internal training, licenses and certifications, financial regulatory registration, areas of expertise general management experience, leadership behaviour
- **Swipe card entry data**
- **Technical Information:** Username and passwords, IP address, domain, browser type, operating system click-stream data and system logs, electronic and non-electronic content and documents created or produced by you using Company systems or in the performance of your role with the Company
- **Timekeeping/ Attendance/ Absence Data:** Shift and overtime data, absence details, e.g., sickness, holiday, and leaves of absence, Working Time Directive details
- **Virtual or In Person Events Data:** Speaker biographies, travel details, spouse/partner name, special assistance needs of individuals attending an event, name and age of child/children collected through parents or guardians, dietary requirements of individuals attending an event
- **Visa/ Citizenship Information:** Work eligibility status, entitlement to residency, citizenship, visa details, passport details

### Third Parties with Whom We May Share Personal Information

To the extent permitted by applicable law and as appropriate to achieve the purposes described in this Notice, Personal Data may be disclosed by the Company as outlined in the table below and, where applicable, in accordance with Section XI. Jurisdiction Specific Clauses of this Notice.

Type of Recipient	Personal Information Categories
<p><b>Professional Advisors:</b> Accountants, auditors, lawyers, insurers, bankers, tax advisors and other outside professional advisors in all the countries in which the Company operates.</p>	<p>Personal information is shared, unless restricted by applicable law, with Professional Advisors and Service Providers to the extent they provide services that align with the purposes in the table above. The Personal Information categories shared with Professional Advisors and Service Providers aligns with the services they provide to the Company, including:</p> <ul style="list-style-type: none"> <li>• Accident and Incident Reporting</li> <li>• Biometrics for authentication</li> <li>• Business Travel Information</li> <li>• Confidential Unique Identifiers</li> <li>• Opportunity and Inclusion Data</li> <li>• Employment Disciplinary and Investigations Record</li> <li>• Employment Information</li> <li>• Financial Account Information</li> <li>• Health Information</li> <li>• Photo/ Video/ Voice Recording</li> <li>• Information you provide about Family and Friends</li> <li>• Job Information</li> <li>• Outside Business Activities</li> <li>• Personal Contact Information</li> <li>• Securities and Stock Trading</li> <li>• Signatures</li> <li>• Skills and Qualifications</li> <li>• Swipe card entry data</li> <li>• Technical Information</li> <li>• Timekeeping/ Attendance/ Absence Data</li> <li>• Virtual or In Person Events Data</li> <li>• Visa/ Citizenship Information</li> </ul>

Type of Recipient	Personal Information Categories
<p><b>Service Providers:</b> Companies that provide products and services to the Company in the countries in which the Company operates, such as benefits providers; asset managers that advise or sponsor investment products that the Company distributes to its clients; human resources services, recruitment and training providers; training, expense management, IT systems suppliers and support; reception and security, catering and logistics services providers, translation services, third parties assisting with event organizing and marketing activities, trade bodies and associations, real estate management, and other service providers including, where applicable, your employer or company.</p> <p>Note: Where appropriate, the Company will offer and receive reasonable assistance from third parties (such as service providers) to respond to data subject access requests.</p>	<p>Personal information is shared, unless restricted by applicable law, with Professional Advisors and Service Providers to the extent they provide services that align with the purposes in the table above. The Personal Information categories shared with Professional Advisors and Service Providers aligns with the services they provide to the Company, including:</p> <ul style="list-style-type: none"> <li>• Accident and Incident Reporting</li> <li>• Biometrics for authentication</li> <li>• Business Travel Information</li> <li>• Confidential Unique Identifiers</li> <li>• Opportunity and Inclusion Data</li> <li>• Employment Disciplinary and Investigations Record</li> <li>• Employment Information</li> <li>• Financial Account Information</li> <li>• Health Information</li> <li>• Photo/ Video/ Voice Recording</li> <li>• Information you provide about Family and Friends</li> <li>• Job Information</li> <li>• Outside Business Activities</li> <li>• Personal Contact Information</li> <li>• Securities and Stock Trading</li> <li>• Signatures</li> <li>• Skills and Qualifications</li> <li>• Swipe card entry data</li> <li>• Technical Information</li> <li>• Timekeeping/ Attendance/ Absence Data</li> <li>• Virtual or In Person Events Data</li> <li>• Visa/ Citizenship Information</li> </ul>

Type of Recipient	Personal Information Categories
<p><b>Public and Governmental Authorities:</b> Entities that regulate or have jurisdiction over the Company in the countries in which the Company operates, such as regulatory authorities, law enforcement, public bodies, licensing and registration bodies, judicial bodies and third parties appointed by such authorities.</p>	<ul style="list-style-type: none"> <li>• Accident and Incident Reporting</li> <li>• Business Travel Information</li> <li>• Compensation Information</li> <li>• Opportunity and Inclusion Data (aggregate)</li> <li>• Employment Disciplinary and Investigations Record</li> <li>• Employment Information</li> <li>• Fingerprinting Data (applicable countries only)</li> <li>• Health Information (aggregate)</li> <li>• Photo/ Video/ Voice Recording</li> <li>• Job Information</li> <li>• Outside Business Activities</li> <li>• Securities and Stock Trading</li> <li>• Signatures</li> <li>• Skills and Qualifications</li> <li>• Tax Information (aggregate)</li> <li>• Timekeeping/ Attendance/ Absence Data</li> <li>• Visa/ Citizenship Information</li> </ul>
<p><b>Parties Related to a Corporate Transaction:</b> A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Company's business, assets or stock (including in connection with any bankruptcy or similar proceedings), e.g., stock exchanges and business counterparties.</p>	<ul style="list-style-type: none"> <li>• Compensation Information</li> <li>• Confidential Unique Identifiers</li> <li>• Employment Information</li> <li>• Job Information</li> <li>• Skills and Qualifications</li> <li>• Virtual or In Person Events Data</li> <li>• Visa/ Citizenship Information</li> </ul>
<p><b>Trade Unions:</b> Trade unions to which the Contractors are affiliated.</p>	<ul style="list-style-type: none"> <li>• Employment information</li> <li>• Job Information</li> <li>• Skills and Qualifications</li> </ul>
<p>Current or prospective customers and clients.</p>	<ul style="list-style-type: none"> <li>• Photo/ Video/ Voice Recording</li> <li>• Job Information</li> </ul>
<p>Event Vendors: Event vendors, organizers, speakers, volunteers, contractors, and sponsors to facilitate events. <b>Contractors must not participate in events unless the event is directly related to the work assignment.</b></p>	<ul style="list-style-type: none"> <li>• Business Travel Information</li> <li>• Photo/ Video/ Voice Recording</li> <li>• Information you provide about Family and Friends (if they are attending events)</li> <li>• Job Information</li> <li>• Personal Contact Information</li> <li>• Virtual or In Person Events Data</li> </ul>
<p><b>Online Tracking providers:</b> To improve technical and design features of our websites and platforms</p>	<ul style="list-style-type: none"> <li>• IP Address</li> </ul>