

### CAYMAN ISLANDS RECRUITMENT DATA PROTECTION NOTICE

Effective: 1 October 2025

#### I. INTRODUCTION

One or more of the entities set out in [Appendix B](#) (being the legal entity/ies to which the Applicant is applying) (the “Company”) has prepared this Recruitment Data Protection Notice (“Notice”) to outline their practices regarding the collection, use, storage, transfer (including internationally) and other processing of individually identifiable information collected from or about Applicants (“Personal Data”). For the purpose of this Notice, “Applicant” refers to any individual who submits Personal Data, or about whom Personal Data has been acquired, in order to be considered for an actual or potential job vacancy, or who attends or applies to attend a career event.

In the event this Notice is provided to an Applicant 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 recruitment and talent management 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](#) 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 references, 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 depending on the circumstances: (i) because we are required or permitted to do so by applicable law, (ii) because such information is necessary for the performance of your future contract of employment if successful at recruitment stage, or in order to take steps at your request prior to entering into that contract, (iii) because such information is of particular importance to us and we have a specific legitimate interest under applicable law to process it, (iv) where public interest requires it, (v) where the Personal Data is necessary for the establishment, exercise or defence of legal claims, (vi) where necessary to protect the vital interests of you or another person, or (vii) where necessary, we obtain consent of Applicants 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.

You are responsible for the content of the information you provide to us, and you must ensure it is legal, honest, truthful, accurate and not misleading in any way. You must ensure that the information provided by you does not contain material that is obscene, blasphemous, defamatory, infringing on any rights of any third party, or otherwise legally actionable by such third party. You understand that, in the event that your application is successful, you may

be subject to disciplinary action and possible dismissal if the statements contained in the application form and supporting documents prove to be untrue.

The Company processes Personal Data to the extent permitted by applicable law and as appropriate to the context of the collection of such information. Unless otherwise indicated, all Personal Data requested by the Company is mandatory in order for the Company to achieve the purposes listed above. You may refuse to provide it. However, if you do not provide the Personal Data requested, or if you object to, withdraw consent to or request discontinuance of the collection, use, disclosure, transfer and other processing of Personal Data as described in this Notice, the Company may not be able to process or continue your application or contract, to the extent permitted by applicable law.

The Company does not use the Personal Data of any Applicant for direct or indirect marketing purposes, except where the Company obtains the Applicant's explicit consent to do so and provides the Applicant with the subsequent right to object at any time and at no charge to the use of Personal Data for direct or indirect marketing purposes.

### **SENSITIVE PERSONAL DATA**

The Company may collect and process certain special or other significant categories of Personal Data ("Sensitive Personal Data") about Applicants where required, necessary or permitted under applicable law, or where necessary for the establishment, exercise, or defence of legal claims, or, where necessary, the Applicant has provided their explicit (and, where applicable, written or separate) consent. Subject to applicable law, the Company may process information about:

- physical and/or mental health for the purposes of addressing potential workplace health, safety and accommodation issues;
- data related to sexual orientation, race and/or ethnic origin, gender, gender identity and gender expression and physical and/or mental health for purposes of reporting on opportunity and inclusion statistics, complying with government reporting requirements, and/or other legal obligations.

We process Sensitive Personal Data in your jurisdiction if and to the extent permitted or required by applicable law. We will seek to protect such information using strict security measures as further described below such that your sensitive personal information should only be processed in accordance with the applicable laws.

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

### **PERSONAL DATA ABOUT OTHER INDIVIDUALS**

If an Applicant provides the Company with Personal Information about other individuals (e.g., individuals listed by Applicants as references), it is that Applicant's responsibility to inform such individuals of their rights (see Section VII "Access, Portability, Rectification and Suppression, Limitation and Restriction of Processing and Accuracy of Personal Data" and Section IX "Other Rights and Consequences") and to obtain their (explicit) consent that their data can be shared with the Company. Should the individual have any questions, or if you are sharing information for an individual who is based in EEA, Switzerland or UK please provide them with a copy of this Notice, noting Section X "Questions" setting out our contact information.

### **MEANS OF COLLECTION AND USE**

During and in connection with the recruitment and talent identification process, and in order to be considered for actual and potential job vacancies, the Company may collect Personal Data directly from Applicants through the completion and submission of online application forms and profiles, through resumes or curriculum vitae, or through interviews or other communications (both verbally and in writing) with Applicants. The Company may also collect Personal Data from other sources, including specialist third-party providers of recruitment services, career or professional social networking sites and publicly available sources. Personal information will be collected to the

extent permitted by applicable law and as appropriate for the actual or potential job vacancy or career event for which the Applicant is seeking to be considered.

Collection, use, processing, disclosure, or international transfer, including storage of Personal Data may be by automated or manual means, including by hard-copy or soft-copy documents or other appropriate technology; however, please note that the Company does not use automated decision making on Applicant recruitment processes (See Section VIII “Modalities of the Processing and Data Retention”).

### **III. COOKIES**

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

[https://business.bofa.com/content/dam/boamlimages/documents/articles/ID19\\_0760/Cookie\\_Policy.pdf](https://business.bofa.com/content/dam/boamlimages/documents/articles/ID19_0760/Cookie_Policy.pdf)

### **IV. DATA STORAGE AND ACCESS BY COMPANY PERSONNEL**

The Company maintains an automated record of the Personal Data of the Applicant. The Company may also maintain hard-copy records on Applicants. The Company maintains these records in a secure environment including in the Company’s HR Information System and other applicant tracking systems. Personal Data may be stored in the Applicant’s home jurisdiction and/or in other jurisdictions in which the Company has operations.

Where permitted by applicable law, access to Personal Data is restricted to those individuals who need such access for the purposes listed in Appendix A, including but not limited to members of the Human Resources Department and the managers involved in the recruitment process, 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.

### **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 transfer your personal data outside the country/providence in which you are based (subject to applicable law and for the purposes described in this Notice) including to the United States or other jurisdictions where data protection laws may not provide an equivalent level of protection to the applicable laws in the Applicant’s home jurisdiction. Any such transfer will be undertaken in accordance with applicable data protection law. A listing of affiliates belonging to the Bank of America Corporation group to whom your personal data may be transferred can be provided upon request using the contact information provided in Section X “Questions” 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](#), the Company will delegate such processing in writing, will choose a data processor that provides sufficient guarantees with respect to technical and organisational 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 legitimate interests of the Company (unless this would prejudice the rights and freedoms or interests of the Applicant), 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 organisational 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](#).

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

Applicants are entitled to access Personal Data held about them where permitted under applicable law (with the exception of any documents that are subject to legal privilege, that provide Personal Data about other unrelated individuals, or that otherwise are not subject to data subject access rights, including pre-employment references which are provided to us or that we provide that are deemed confidential). Any Applicant who wishes to access their Personal Data or (where permitted under applicable law) request portability of their data, should contact a member of the Global Talent Acquisition Department using the contact information set out in Section X “Questions” below.

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

To assist the Company in maintaining accurate Personal Data, Applicants must ensure they keep their Personal Data up to date on the Company’s Global HR system or online recruitment system (as applicable) or by informing the Global Talent Acquisition Department using the contact information set out in Section X “Questions” below, 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, Applicants 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) in a structured, commonly used and machine-readable format or request that we transfer this data to another controller;
- to request further information or complain about the Company’s practices and processes regarding their Personal Data;
- to object to, withdraw consent, 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.
- rights related to automated decision making

For all enquiries, Applicants should contact a member of the Global Talent Acquisition Department using the contact information set out in Section X “Questions” 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 recruitment processes. ‘Automated decision-making’ is the process of making a decision by automated means without any human involvement. The processing of Personal Data is carried out with the aid of manual and electronic tools.

The Company will maintain your 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 “Personal Data Collection and Purposes of Use”, whichever is longer (“Initial Retention Period”). With the exception of the countries listed below, if your

application is unsuccessful your Personal Data will be retained for an Initial Retention Period of 6 months. An application is deemed unsuccessful for these purposes if no offer of employment is made or failure to commence employment with the bank for whatever reason.

In addition, the Company will, with your consent, retain your Personal Data after the expiry of the Initial Retention Period in its talent management database so that it may contact you with details of suitable positions that arise, and which may be of interest to you. If you do not wish the Company to retain your Personal Data in its talent management database after the expiry of the Initial Retention Period, you may request that your Personal Data be deleted. You may make this request at any time, via the contact details in Section X “Questions”, but your request will not be actioned until the Initial Retention Period has expired. Except for the countries listed below, if your application is unsuccessful, unless you do not consent to your Personal Data being retained by the Company in its talent management database, or you subsequently request that your Personal Data be deleted, your Personal Data will be retained for a total of 2 years after the date of last recorded contact with you.

Any maximum storage term set forth by applicable law will prevail. The Company will delete Personal Data after the applicable retention period.

If your application is successful, your application is retained as part of your personnel record. An application is deemed successful if an offer for employment is extended and employment begins.

## **IX. OTHER RIGHTS AND CONSEQUENCES**

To ensure good recruitment and talent management practices, and the effective running of the Company’s business, it is mandatory for the Company to collect, use, store, transfer and otherwise process the Personal Data in [Appendix A](#) (unless otherwise indicated during the application process). It is voluntary for Applicants to provide other types of Personal Data and information about themselves.

To the extent available under applicable law, Applicants have the right to object to the collection, use, storage, transfer or other processing of Personal Data as described in this Notice, the right to withdraw consent to or request discontinuance of collection, use, storage, transfer or other processing of Personal Data as described in this Notice, and the right to request deletion of such Personal Data. However, objections to the collection, use, storage, transfer or other processing of Personal Data, withdrawals of consent, requests for discontinuance and requests for deletion may affect the Company’s ability to consider an Applicant for an actual or potential job vacancy or career event, and to process a related application for employment to the extent that the purposes set out in this Notice cannot be achieved.

Any Applicant who wishes to object to the collection, use, storage, transfer, or other processing of Personal Data as described in this Notice, to withdraw consent, to request discontinuance or to request deletion should contact a member of the Global Talent Acquisition Department using the contact information set out in Section X “Questions” 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.

If you are dissatisfied with the way the Company handles your request, you may have the right to lodge a complaint with the local Data Protection Authority in your country.

## **X. QUESTIONS**

Should any Applicant have any questions, concerns or complaints about this Notice, please contact a member of the Global Talent Acquisition Department via: [internationaltalentacquisitionoperations@bofa.com](mailto:internationaltalentacquisitionoperations@bofa.com)

The Company will make every effort to resolve any questions, concerns, or complaints promptly and in accordance with applicable law.

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

|               |                                                |
|---------------|------------------------------------------------|
| Non-US Region | <a href="mailto:DPO@bofa.com">DPO@bofa.com</a> |
|---------------|------------------------------------------------|

You may have the right to lodge a complaint with the Data Protection authority for your country.

**XI. CHANGES TO THIS NOTICE**

The most up-to-date Notice is posted to the Bank of America Careers Website.

**XII. JURISDICTION-SPECIFIC CLAUSES**

None

## **Recruitment Data Protection Notice – Declaration of Acknowledgement of the Notice**

I have read the “Recruitment Data Protection Notice”. I acknowledge the 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 application.

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.

By clicking Submit on the Application, you acknowledge this Notice.

## Appendix A

“We” or “our” refer to Bank of America Corporation legal entities that are data controllers pursuant to the relevant Data Protection Law; “you” or “yours” refers to the Applicant.

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.

| Purpose                                          | Examples of Processing Activities                                                                                                                                        | Personal Information Categories                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Legal Basis (only applicable for jurisdictions where a legal basis is required)                     |
|--------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|
| <i>Recruitment selection and talent planning</i> | <i>Reviewing Applicant resume and determining whether Applicant meets role requirements and where applicable appropriately talent planning for future opportunities.</i> | <ul style="list-style-type: none"> <li><i>Applicant information/contact details: such as name, address, email address, phone number</i></li> <li><i>Internal unique employee identifiers e.g., person number</i></li> <li><i>Confidential unique internal employee identifiers i.e., length of service in current role, most recent performance rating (employee standing e.g., good standing status)</i></li> <li><i>Visa/Citizenship information: Work eligibility status</i></li> <li><i>Previous compensation</i></li> <li><i>Previous compensation</i></li> <li><i>Internal job information: job title and/or position and description of responsibilities/duties, job family, location, band/seniority, department, line and sub-line of business, local Company entity name, cost center information, supervisor/manager/team lead name and contact information, reporting structure, work contact information</i></li> <li><i>Academic and educational record</i></li> <li><i>Language(s)</i></li> <li><i>Professional qualifications and memberships/licenses e.g., licenses, certifications and financial regulatory registration</i></li> <li><i>Skills and qualifications: areas of expertise, general management experience, leadership behavior</i></li> <li><i>Video/voice recording</i></li> </ul> | <i>Where applicable, Compliance with a Legal Obligation, Legitimate Interest, otherwise Consent</i> |



| Purpose                                                                | Examples of Processing Activities                                                                                                                                  | Personal Information Categories                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Legal Basis (only applicable for jurisdictions where a legal basis is required) |
|------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|
| <i>Interviews, assessments, testing or virtual or in person events</i> | <i>Facilitating in person or online interviews, assessments, testing or arranging events.</i>                                                                      | <ul style="list-style-type: none"> <li>• <i>Contact details</i></li> <li>• <i>Car registration</i></li> <li>• <i>CCTV</i></li> <li>• <i>Information as to medical conditions, special educational needs or disability meaning that special adjustments or assistance is needed</i></li> <li>• <i>Dietary requirements of individuals attending an event</i></li> <li>• <i>Photo/video/voice recording</i></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <i>Where applicable, Legitimate Interest, otherwise Consent</i>                 |
| <i>Promotional activities</i>                                          | <i>Activities including but not limited to inclusion in internal and external internet and intranet sites, marketing materials and event management materials.</i> | <ul style="list-style-type: none"> <li>• <i>Photo/video</i></li> <li>• <i>Applicant name</i></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <i>Where applicable, Legitimate Interest, otherwise Consent</i>                 |
| <i>Job offering</i>                                                    | <i>Constructing job offer to ensure appropriate components and details capture.</i>                                                                                | <ul style="list-style-type: none"> <li>• <i>Contact details</i></li> <li>• <i>Previous compensation history: base salary, incentive payment(s), stock options and allowances</i></li> <li>• <i>Visa/Citizenship information: Work eligibility status, nationality</i></li> <li>• <i>Details and evidence of restrictions arising from current employment e.g., restrictive covenants/non-solicitation/non-compete</i></li> <li>• <i>Previous employment history/information</i></li> <li>• <i>Academic and educational record</i></li> <li>• <i>Professional qualifications and memberships/licenses</i></li> <li>• <i>Outside Business Activities: Details of outside business activities and directorships (where relevant for employment-related purposes)</i></li> <li>• <i>Information about relatives/close personal relationships currently employed by the Company i.e., relatives full name</i></li> </ul> | <i>Where applicable, Legitimate Interest, otherwise Consent</i>                 |

| Purpose                                                          | Examples of Processing Activities                                                                                                                                                                                                                                                                                                                                                                                                          | Personal Information Categories                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Legal Basis (only applicable for jurisdictions where a legal basis is required) |
|------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------|
| <i>Opportunity and Inclusion (for applicable countries only)</i> | <i>Reporting and data analytics, relating to opportunity and inclusion. Use of opportunity and inclusion data outside of legitimate HR purposes is aggregated. Complying with government reporting requirements, and/or other legal obligations.</i>                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>Gender, gender identity, gender expression, ethnicity, veteran status, disability status, sexual orientation</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <i>Where applicable, Legitimate Interest, otherwise Consent</i>                 |
| <i>Expense reimbursement</i>                                     | <i>Reimbursement of costs incurred for recruitment process where applicable (e.g., Applicant travel costs).</i>                                                                                                                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>Contact details</li> <li>Financial account information i.e., bank account details</li> <li>Expense statements/information: travel documentation to evidence costs incurred</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <i>Where applicable, Legitimate Interest, otherwise Consent</i>                 |
| <i>Employment offer acceptance</i>                               | <i>If applicable formal acceptance of the offer/employment as detailed.</i>                                                                                                                                                                                                                                                                                                                                                                | <ul style="list-style-type: none"> <li>Signatures: including digital images, written/electronic and physical copies</li> <li>If evidence is provided in person at our premises: CCTV, photograph, car registration</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <i>Where applicable, Legitimate Interest, otherwise Consent</i>                 |
| <i>Right to work/global mobility</i>                             | <i>Details/documentation to determine work eligibility, establishing work authorisation and demonstration of the right to work in the country of hire/employment/appointment in accordance with legal requirements i.e., processing visa requests where necessary. And where applicable for the provision of services to employees or candidates in relation to mobility formalities or expense reimbursement claims where applicable.</i> | <ul style="list-style-type: none"> <li>Personal contact information: such as name, address, email address, phone number</li> <li>Internal unique employee identifiers e.g., person number</li> <li>Visa/Citizenship information: work eligibility status, nationality/citizenship; date of birth, gender, passport details/copy, immigration/visa status and details, residency entitlement or information provided about spouse/partner and/or dependents</li> <li>Internal job information</li> <li>Compensation information</li> <li>Financial account information i.e., bank account details</li> <li>Tax information: social security number or other national tax identification numbers</li> <li>Expense statements/information where applicable evidencing costs incurred</li> </ul> | <i>Where applicable, Legal Obligation, otherwise Consent</i>                    |

| Purpose                                                                                              | Examples of Processing Activities                                                                                                       | Personal Information Categories                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Legal Basis (only applicable for jurisdictions where a legal basis is required)                                                                                                                                               |
|------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Payroll/pay, compensation, benefits, occupational health assessment and enterprise onboarding</i> | <i>Designing and delivering employee compensation, incentives, benefits, occupational health assessments and Enterprise onboarding.</i> | <ul style="list-style-type: none"> <li>• <i>Personal contact information</i></li> <li>• <i>Internal job information</i></li> <li>• <i>Internal unique employee identifiers</i></li> <li>• <i>Compensation information</i></li> <li>• <i>Employment information: offer accept dates, hire types (external/internal), and hire dates</i></li> <li>• <i>Financial Account Information i.e., bank account details</i></li> <li>• <i>Information you provide about spouse/partner, family, dependents and/or selected individuals i.e., full names and date(s) of birth, emergency contact details, name and age of child/children</i></li> <li>• <i>Signatures</i></li> <li>• <i>Tax information: social security number or other national tax identification numbers, tax forms e.g., P60 (UK), IRP5/IT3(a) certificates (South Africa)</i></li> <li>• <i>Original documentary evidence of any forfeited entitlements</i></li> <li>• <i>Information as to medical conditions, special educational needs or disability (Medical questionnaire): physical and/or medical health assessment, where required undertake any occupational health assessment for the purpose of addressing workplace health, safety and issues accommodation</i></li> </ul> | <p><i>Where applicable, Performance of a Contract, otherwise Consent</i></p> <p><i>For sensitive data: Where applicable, preventative or occupational health in the context of employment, otherwise Explicit Consent</i></p> |
| <i>Access and identity log in credentials</i>                                                        | <i>Managing internal technology infrastructure access.</i>                                                                              | <ul style="list-style-type: none"> <li>• <i>Technical information: username, password, security verification questions and answers</i></li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <i>Where applicable, Legitimate Interest, otherwise Consent</i>                                                                                                                                                               |

#### **The categories of unaffiliated 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 XII “Jurisdiction-Specific Clauses” of this Notice.

| Categories of Third-Parties and Reasons for Processing                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Personal Information Categories                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Destination Countries                                                                  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------|
| <p><b>Service Providers:</b> Companies that provide products and services to the Company in the countries in which the Company operates pertaining to purposes described in this Notice, such as recruitment activities, human resources services, recruitment providers, expense management, relocation services, IT systems suppliers and support, reception and security, catering and logistics services providers, translation services, third-parties assisting with event organising and promotional and marketing activities, trade bodies and associations, payroll, partner banks, pension scheme, benefit providers, medical or health practitioners 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) in order to respond to data subject access requests.</p> | <p>Any of the Personal information Categories listed in this Notice may be shared, unless restricted by applicable law, with Service Providers to the extent they provide services that align with the purposes in the table above. The Personal Information categories shared with Service Providers aligns with the services they provide to the Company, including:</p> <ul style="list-style-type: none"> <li>• <i>Applicant information/contact details</i></li> <li>• <i>Visa/Citizenship information</i></li> <li>• <i>Employment information</i></li> <li>• <i>Internal job information</i></li> <li>• <i>Internal unique employee identifiers</i></li> <li>• <i>Confidential unique internal employee identifiers</i></li> <li>• <i>Compensation information</i></li> <li>• <i>Previous compensation</i></li> <li>• <i>Previous employment history</i></li> <li>• <i>Academic and educational record</i></li> <li>• <i>Language(s)</i></li> <li>• <i>Professional qualifications and memberships/licenses</i></li> <li>• <i>Photo/video/voice recording</i></li> <li>• <i>Information as to medical conditions, special educational needs or disability</i></li> <li>• <i>Previous compensation history</i></li> <li>• <i>Outside Business Activities</i></li> <li>• <i>Information about relatives/close personal relationships currently employed by the Company</i></li> <li>• <i>Information about spouse/partner, family, dependents and/or selected individuals</i></li> <li>• <i>Financial account information</i></li> <li>• <i>Expense statements/information</i></li> <li>• <i>Gender, gender identity, gender expression, ethnicity, veteran status, disability status, citizenship, nationality, sexual orientation</i></li> <li>• <i>Technical information: username, password, security verification questions and answers</i></li> <li>• <i>Signatures</i></li> <li>• <i>Tax information</i></li> <li>• <i>Talent planning data</i></li> </ul> | <p>Globally where we have presence<br/>- <a href="#">Bank of America Locations</a></p> |

| Categories of Third-Parties and Reasons for Processing                                                                                                                                                                                                                                                                          | Personal Information Categories                                                                                                                                                                                                                                                                                       | Destination Countries |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| <b>Public and Governmental Authorities:</b><br>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. | <ul style="list-style-type: none"> <li>• <i>Personal contact information</i></li> <li>• <i>Internal unique employee identifiers</i></li> <li>• <i>Visa/Citizenship information</i></li> <li>• <i>Internal job information</i></li> <li>• <i>Compensation information</i></li> <li>• <i>Tax information</i></li> </ul> |                       |
| <b>Professional Advisors:</b> Accountants, auditors, lawyers, and other outside professional advisors in all of the countries in which the Company operates.                                                                                                                                                                    | <ul style="list-style-type: none"> <li>• <i>Personal contact information</i></li> <li>• <i>Internal job information</i></li> <li>• <i>Visa/Citizenship information</i></li> <li>• <i>Internal unique employee identifiers</i></li> <li>• <i>Compensation information</i></li> <li>• <i>Tax information</i></li> </ul> |                       |
| <b>Event Vendors:</b> Event vendors, organisers, speakers, volunteers, contractors, and sponsors to facilitate events.                                                                                                                                                                                                          | <ul style="list-style-type: none"> <li>• <i>Photo/video/voice recording</i></li> <li>• <i>Virtual or in person events data</i></li> <li>• <i>Applicant contact information</i></li> <li>• <i>Dietary requirements of individuals attending an event</i></li> </ul>                                                    |                       |
| <b>Online Tracking Providers:</b> To improve technical and design features of our websites and platforms.                                                                                                                                                                                                                       | <ul style="list-style-type: none"> <li>• <i>IP address</i></li> <li>• <i>Technical information: including username, passwords</i></li> </ul>                                                                                                                                                                          |                       |
|                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                       |                       |

## Appendix B

| Country/Region | Legal Entity                                     |
|----------------|--------------------------------------------------|
| Cayman Islands | ML BANK & TRUST CO (CAYMAN) LTD-KY BANK OFFSHORE |