
Europe, Middle East and Africa (EMEA)

Wells Fargo International Job Applicant Privacy Notice

This notice applies to the United Kingdom (“**UK**”), countries in the European Union (“**EU**”) and the Dubai International Financial Center (DIFC) (collectively, “**EMEA**”).

Effective: 24 August 2023

"We," "us," "our," or "Wells Fargo" refers to Wells Fargo Bank, National Association, London Branch, Wells Fargo Bank International Unlimited Company, Wells Fargo Bank International Unlimited Company, Frankfurt, Wells Fargo Securities Europe S.A., Wells Fargo Securities International Limited, Wells Capital Finance (UK) Limited, Wells Fargo Capital Finance, Amsterdam Branch, Wells Fargo Capital Finance, Stockholm Branch, Wells Fargo International Finance (France) S.A.S., Wells Fargo Bank, National Association, DIFC Branch and/or the Wells Fargo entity that has job openings made available on this site or through the employment agencies. **"You" or "your"** refers to the applicant. When you, or an employment or recruiting agency acting on your behalf, submit information related to you ("**Personal Data**") to us in order to apply for a job vacancy, the relevant Wells Fargo entity (the "**Company**") will act as the data controller regarding the processing of the Personal Data that are processed by Wells Fargo in accordance with this privacy notice ("**Notice**"). Use of the Wells Fargo career website (<http://www.wellsfargojobs.com>) before starting the process of applying for a job opening, including collection and use of information and the entity operating that website, is discussed below in Section 14.

Wells Fargo is one of the largest financial institutions operating globally. We have affiliated companies around the world, including in the United States ("**Affiliated Entities**"). As described in Section 2, in order to carry out operations in connection with your job application, we need to process certain Personal Data, as described below.

Name of group parent: Wells Fargo & Company

Headquarters location: 420 Montgomery Street; San Francisco, CA 94104, USA

“Wells Fargo” means Wells Fargo & Company and its affiliates and subsidiaries. Contact information for our EMEA Regional Privacy Officer is listed in Section 11.

1. What Personal Data do we collect?

We may collect the following categories of Personal Data:

- **General data:** first name, middle name, and surname (including any previous names used); personal contact details (home and mobile telephone numbers, email addresses, and home address); date and place of birth; citizenship; marital status; gender; and veteran/military status.
- **Position or employment/work description:** employer; title; position held; length of tenure and work authorization status.

- **Identification and Authentication data:** national or governmental identification such as passport or national identification card; driver's licence; national insurance number or tax and/or social insurance number; information required for tax reporting; health insurance information; home address and telephone number; documents that verify address; date of birth; country of domicile; documents that verify employment; and signature authorization or information we use to identify and authenticate you e.g. your signature or additional information we get from external sources that we need for compliance purposes.
- **Applicant access or system usage data:** information given by completing forms and surveys as well as data about your use of our application systems, including authentication credentials such as user names or IDs and passwords to log into portals; location data; user display name and identifier; other website or product access information.
- **Background or credit check data:** to the extent required or permitted by local law, credit check information and background check information including credit and criminal checks and screening; prior employment history; data associated with verification of politically exposed persons; education history; professional memberships and qualifications; and other information contained in your curriculum vitae or resume.
- **Qualifications data:** information concerning any qualifications you hold e.g. university education, professional certifications.
- **Third-party data:** name, title, employer, and location of any individual who you are related to or have a close personal relationship with and who: (a) provides you with a reference; (b) is a U.S. or non-U.S. government official; or (c) has decision-making authority/capability over any matters affecting Wells Fargo.
- **Job preference data:** preferred location(s); desired compensation and currency; and skills such as languages or computer programs that you have mastered.
- **Health data:** information concerning a medical condition, health and sickness records or confirmation if you are able to perform a given position (as applicable), information about any disabilities you might have.
- **Market data:** information from market research, any data obtained and opinions expressed when participating in any new applicant surveys.
- **Application and communication data:** application data and any correspondence and information about you that you give us by filing in forms or by communicating with us (e.g. via interviews or online assessments or tests), whether face-to-face, by phone, video calls, email, online or otherwise.
- **Geographical data:** information about your location e.g. about which is the nearest Wells Fargo offices you visit for your interview.
- **Investigation data:** data collected for Wells Fargo investigation process (if used) e.g. due diligence checks, fraud, sanctions and anti-money laundering checks, external intelligence reports, and content and metadata related to relevant exchanges of information among individuals, organizations, including, emails, live chat, video calls, voicemail etc.
- **Complaints data:** data collected for the processing in relation to any Wells Fargo complaints procedures.
- **Regulatory data:** information we need to support our regulatory obligations.
- **Sensitive Personal Data:** Wells Fargo may also collect certain types of special category personal data as permitted and/or required by local law, such as health/medical information, gender identity, pronouns, sexual orientation, biometric data, trade union membership information, religious beliefs, and data related to race or ethnicity (collectively, "**Sensitive Personal Data**"). We collect this information for specific purposes, such as health/medical information in order to accommodate a disability; and diversity-related Personal Data (such as race or ethnicity) in order to comply with legal obligations and internal policies relating to diversity and anti-discrimination. As explained below, we will only use such sensitive information for those purposes and as permitted by law.

Any information you submit to us must be true, complete and non-misleading. Submitting inaccurate, incomplete, or misleading information may lead to rejection of your application during the application process or disciplinary action, including immediate termination of your employment with us. In addition, it is your responsibility to ensure that the information you submit does not violate the rights of third parties.

If, as part of your application, you provide us with Personal Data of a reference or any other individual, it is your responsibility to obtain consent from that individual prior to providing such information to us.

For the purpose of background checks in connection with your application, and as permitted by applicable law, we may obtain information about you from other sources. These include:

- Your references;
- Prior employers;
- Educational institutions you attended;
- Government databases;
- Credit reference agencies;
- Criminal records agencies; and
- Background screening vendors.

We may conduct enhanced background checks for specific high-risk roles within Wells Fargo and these roles will be identified as such. This will be carried out during recruitment (before or shortly after commencing the role) and periodically throughout your employment, in line with Wells Fargo policies and procedures.

Providing Personal Data to us when applying for a job is voluntary. If you do not provide sufficient information, however, the Company may be unable to consider your employment application or, in case you are hired, your subsequent promotion, transfer, or relocation.

2. For what purpose(s) do we use Personal Data and under which lawful bases?

The Company may process Personal Data:

- because you voluntarily provide this information and give your consent for us to process it;
- because this information is necessary to take steps at your request prior to entering into an employment or internship contract with us;
- because we have a specific legitimate interest to process it;
- to comply with a legal obligation;
- to establish, utilize and defend our legal rights;
- for insurance purposes;
- because this information is necessary for the performance of a task carried out in the public interest (e.g. for the purpose of preventing or detecting crime); or
- because this information is necessary to protect the vital interests of any person.

The Company may process your Personal Data in connection with your expression of interest or application for employment for the following purposes ("**Pre-Employment Purposes**"):

- to process your application. We will engage in these activities to manage our prospective contractual relationship with you, based on our legitimate interests;
- to assess your capabilities and qualifications for a job. We will engage in these activities to manage our prospective contractual relationship with you, based on our legitimate interests;
- to conduct reference checks. We will engage in these activities to comply with a legal obligation or based on our legitimate interests;
- to respond to your inquiries and communicate with you about your application, and to send you information regarding our vacancies and changes to our terms and policies. We will engage in these activities to manage our prospective contractual relationship with you, based on our legitimate interests;
- to comply with or monitor compliance with any applicable law or regulation. We will engage in these activities to comply with a legal obligation or based on our legitimate interests;
- to conduct background checks if we offer you a position. We will engage in these activities to comply with a legal obligation or based on our legitimate interests;
- to preserve other legitimate interests of Wells Fargo. We will engage in these activities, for example, for Wells Fargo's administrative purposes, business continuity planning, aggregate management reporting, internal training, and as generally required to conduct our business within Wells Fargo and our Affiliated Entities;
- to protect our/your rights, privacy, safety/security or property, and/or that of our Affiliated Entities or others. We will engage in these activities to comply with a legal obligation or based on our legitimate interests;
- to monitor equality of opportunity or treatment generally amongst our staff including with the appointment of senior personnel within the business, to the extent permitted by law (this is considered to be a use of data for substantial public interests under UK law).

3. To whom do we disclose Personal Data?

The Company may transfer Personal Data for Pre-Employment Purposes described in Section 2 to the following recipients:

- **Affiliated Entities.** Jobs posted may be offered by different Affiliated Entities, and Personal Data may be available to them on a worldwide basis. In certain circumstances, an Affiliated Entity may be acting as an independent controller of processing of your Personal Data. In you have any questions, please contact our EMEA Regional Privacy Officer, using the contact information in Section 11.
- **Regulators, public and governmental authorities.** As necessary and in connection with the Pre-Employment Purposes described in Section 2, Personal Data may be transferred to regulators; courts; other authorities (e.g., tax and law enforcement authorities), including authorities outside your country of residence.
- **Service providers.** As necessary and in connection with the Pre-Employment Purposes described in Section 2, Personal Data may be shared with one or more parties, whether affiliated or unaffiliated, to process Personal Data under appropriate instructions ("**Data Processors**"). Such Data Processors may carry out instructions related to IT system support, training, compliance, and other activities, and will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard your Personal Data, and to process your Personal Data only as instructed.
- **Sale or business transaction.** We may have a legitimate interest, or legal obligation to fulfil in disclosing or transferring your Personal Data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

- **Professional Advisors.** This category includes accountants, auditors, lawyers, insurers, bankers, and other outside professional advisors in all of the countries where we operate. As necessary and in connection with the Pre-Employment Purposes as described in Section 2, Personal Data may be shared with one or more professional advisors.

Transferring your data cross-border: We may need to transfer your information in this way for a variety of purposes such as to fulfil our legal obligation, to protect the public interest, and/or for our legitimate interests. The recipients of Personal Data identified in this Section 3 may be located in the United States and other jurisdictions. Some of these countries are recognized by the EU or the UK or the DIFC respectively as providing “an adequate level of protection” according to each of their respective standards (for instance, the full list of these countries recognized under EU law is available at https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en). With regard to transfers from the EU, the UK or the DIFC to countries not considered adequate by the relevant Data Protection Authority, we have put in place safeguards and adequate measures to protect Personal Data, such as standard contractual clauses as adopted by the EU, the UK or the DIFC respectively. Please contact our EMEA Regional Privacy Officer, using the contact information in Section 11, to obtain a copy of these safeguards and measures.

4. How long do we retain Personal Data?

We will retain Personal Data for the period necessary to fulfill the Pre-Employment Purposes outlined in Section 2, unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods are:

- the duration of the application process;
- as long as we have an ongoing relationship with you;
- 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/or
- as determined by our operational needs (such as for internal audit of bank operations, maintaining solicitation preferences, systems administration, or fraud prevention).

We may remove Personal Data of inactive accounts from our database, subject to any applicable legal or regulatory obligations. Furthermore, the Company can delete Personal Data about you (including your CV/résumé) from our database at any time and without providing any reason. Therefore, please retain your own copy of the Personal Data that you provided to us.

5. What security measures do we implement?

The Company has implemented appropriate technical, physical and organizational security measures to safeguard Personal Data (such as encryption) in accordance with Wells Fargo’s Information Security Policy and standards. When we retain a non-affiliated entity or service provider to perform a function, that entity will be required to protect your Personal Data in accordance with our standards. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with Section 11.

6. Does the Wells Fargo career website use Cookies or similar technologies?

We and our service providers use “cookies” and similar technologies on the Wells Fargo career website (www.wellsfargojobs.com). Please see Wells Fargo’s Digital Privacy and Cookies Policy at <https://www.wellsfargo.com/privacy-security/> for more information.

7. Does the Wells Fargo career website link to third-party websites?

This Notice does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the Wells Fargo career website links. The inclusion of a link on the Wells Fargo career website does not imply endorsement of the linked site or service by the Company or our Affiliated Entities.

8. How about Minors?

The Wells Fargo career website is not intended for minors under the age of 18.

9. What Law applies to job applications?

The Wells Fargo career website allows you to apply for jobs worldwide, as a benefit of Wells Fargo’s centralized global recruitment function. This Wells Fargo career website is operated from the United States by Wells Fargo Bank, N.A., 550 South 4th Street, 7th Floor, Minneapolis, Minnesota 55415, (800) 869-3557. Accordingly, any Personal Data you submit to the Wells Fargo career website will be collected in the United States and will be subject to U.S. laws. Personal Data collected by the Wells Fargo career website through browsing that website before beginning the process of applying for a job opening is collected, used, and retained as described the Digital Privacy and Cookies Policy at <https://www.wellsfargo.com/privacy-security/> and is not collected or used for purposes of your job application. If we, however, share your Personal Data with an Affiliated Entity located in another country in its capacity as a potential employer, the Affiliated Entity will handle your Personal Data in accordance with this Notice. Any hiring or other employment-related decisions will be made by the hiring Affiliated Entity in accordance with the laws of the country where the job will be located.

10. What are your rights in relation to Personal Data?

If you would like to request to access, correct, update, suppress, restrict, or delete Personal Data, object to or opt out of the processing of Personal Data, or if you would like to request to receive a copy of your Personal Data for purposes of transmitting it to another company (to the extent that these rights are provided to you by applicable law), you may contact our EMEA Regional Privacy Officer using the contact information in Section 11 . We will respond to your request consistent with applicable law.

You also may lodge a complaint with a Data Protection Authority for your country or region or in the place of the alleged misconduct. Contact information for the relevant Data Protection Authority may be found by clicking on link(s) below:

United Kingdom	Information Commissioner's Office (ICO)
European Union	Our Members European Data Protection Board (europa.eu)
DIFC	Data Protection DIFC

11. Who do you contact for questions on your Personal Data??

The relevant Wells Fargo entity has Regional Privacy Officer(s) who are dedicated to responding to requests in relation to your Personal Data. For the Wells Fargo entities listed in Section 14, please contact our EMEA Regional Privacy Officer using the contact information below:

EMEA Regional Privacy Officer
Address: 33 King William Street
London, United Kingdom
EC4R 9AT
Telephone: +44 (0) 203-942-8000
Email: privacy.emea@wellsfargo.com

12. How do we update this Notice?

We may change or update parts of this Notice to reflect changes in our practices and/or applicable law and regulation. Please check this Notice from time to time so that you are aware of any changes or updates to it, which may be indicated by a change in the effective date noted at the beginning of the Notice. If and when required under applicable law, we will notify you of any change or update in relation to this Notice by either individual message or disclosing the changes to the data processing on an available medium.

13. What about changes to this Notice?

Any changes to the Company's Personal Data processing practices with respect to international (i.e., non-U.S.) applicant data will be posted on the Wells Fargo career website.

14. What Wells Fargo Entities operate in EMEA?

When you apply for a job opening, you are applying for a position at one of these entities below, and that entity is the controller of your information. If you apply for a job opening through the Wells Fargo career website (www.wellsfargojobs.com), Wells Fargo Bank, N.A., London Branch is the controller of the personal data you provide through that website.

A list of Wells Fargo entities that hire individuals, directly or indirectly, in EMEA is set out below:

Name of Wells Fargo Legal Entity	Jurisdiction
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Wells Fargo Bank, National Association, London Branch	United Kingdom
Wells Fargo Securities International Limited	United Kingdom
Wells Capital Finance (UK) Limited	United Kingdom
Wells Fargo Bank International Unlimited Company	Ireland
Wells Fargo Bank International Unlimited Company, Frankfurt Branch, the Dusseldorf Office	Germany
Wells Fargo International Finance (France) S.A.S.	France
Wells Fargo Securities Europe S.A.	France
Wells Fargo Capital Finance, Amsterdam Branch	The Netherlands
Wells Fargo Capital Finance, Stockholm Branch	Sweden
Wells Fargo Bank, National Association, DIFC Branch	Dubai, United Arab Emirates