

## Candidate Privacy Notice

### **Introduction**

This Candidate Privacy Notice ("Notice") describes how Ameriprise and its subsidiaries and related companies (collectively, Ameriprise) handle and protect data to which Ameriprise is provided access in connection with the recruiting process.

Ameriprise will process Candidate Data (as defined below) in accordance with this Notice, unless in conflict with requirements of applicable law, in which case applicable law will prevail.

In the event that you accept employment with Ameriprise, you will be provided with a copy of our Employee Privacy Notice which will set out how and why your data may be processed as an employee.

### **Definitions**

Candidate Data is identifiable information that an individual makes available to Ameriprise in connection with the recruiting process. Ameriprise may collect Candidate Data directly from a job candidate or from third parties, for example, in connection with a background or employment check or employment reference. Candidate Data may include a variety of information, such as candidate status, work history/job data, education, compensation, employer feedback, questionnaire results, contact information, previous addresses or names, additional information provided by the candidate (e.g., a cover letter), driver's license number, passport information, as required for certain positions, references, and criminal history where permitted by law and any information available through publicly available resources, including online media.

Processing refers to any action performed on Candidate Data, such as collecting, recording\*, organizing, storing, transferring, modifying, using, disclosing, deleting or destruction of data which is necessary for: (a) the performance of the employment contract or potential contract; (b) considering your suitability for a position with Ameriprise; (c) complying with a legal obligation Ameriprise is subject to; and/or (d) protecting your interests or those of another person.

Special Categories of Candidate Data is Candidate Data concerning matters such as race or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, health, or sexual orientation. Ameriprise does not request or consider information concerning religion, sex life or political opinions in connection with recruiting. To the extent that other special categories of Candidate Data is processed this will only be where it is necessary (a) for Ameriprise to carry out its obligations or exercise its or a candidate's rights and where it is permitted to do so under local law, (b) for Ameriprise to take or defend itself against legal claims, and/or (c) the data being processed has already been made public by you.

\* Calls may be recorded.

## **Collection**

You may use various electronic and paper methods to submit Candidate Data to Ameriprise. In addition to collecting Candidate Data directly from you, Ameriprise may collect Candidate Data from third parties, for example, from recruiters, in connection with a background or employment check or an employment reference (subject to your consent where required by law) or, to the extent permitted by law, from a recruiting or other online sources.

## **Processing and Retention**

Ameriprise processes Candidate Data for legitimate human resources and business management purposes. These include identifying and evaluating candidates for Ameriprise positions; record-keeping related to hiring processes; analysing the hiring process and outcomes; and conducting background checks, where permitted by law. In addition, Candidate Data may be used to comply with Ameriprise's legal, regulatory, and corporate governance requirements. If a candidate is hired, Candidate Data may be used in connection with his/her employment consistent with Ameriprise's employment data protection policies as set out in its Employee Privacy Notice. In addition to using Candidate Data for the position for which you have applied, Ameriprise may retain and use your Candidate Data to consider you for other positions. If you do not want to be considered for other positions or would like to have your Candidate Data removed, you may contact Ameriprise as specified under *Inquiries, Complaints and Objections* below. Unless required for tax or other legal purposes or in connection with employment as specified above, Candidate Data will generally be retained for a maximum of three years (or less where required by law).

## **Sharing with Third Parties**

Ameriprise may transfer Candidate Data to external third-party providers performing certain services for Ameriprise. Such third-party providers have access to Candidate Data solely for the purposes of performing the services specified in the applicable service contract, such as candidate due diligence. Ameriprise requires the providers to undertake security measures consistent with the protections specified in this Notice at all times.

In addition, in the event of a re-organization, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of Ameriprise's business, Ameriprise may transfer Candidate Data to successor entities or parties.

## **International Data Transfers**

Ameriprise is a global financial services organisation. Accordingly, Candidate Data may be transferred to, and processed in the US and other countries that may not be deemed to provide the same level of data protection as your home country. Transfers of Candidate Data to the US may be undertaken to enable Candidates to be assessed by the global organisation, particularly if the role is based or reports to roles based in the US. Ameriprise maintains and applies employment data protection standards consistent with those specified in this Notice to its operations globally. Additionally, Ameriprise has entered into a Global Data Transfer Agreement governing its treatment of personal information of European Union data subjects.

## **Special Categories of Candidate Data**

Ameriprise may perform background and criminal checks where permitted by law, and may process Candidate Data, such as citizenship or nationality information or health information, when relevant for a position and permitted by law. If you have a disability and would like Ameriprise to consider an accommodation, you may provide that information during the recruiting process.

## **Security and Confidentiality**

Ameriprise employs technical and organizational measures designed to protect the integrity, confidentiality, security, and availability of Candidate Data, and to comply with applicable legal requirements for information security. Ameriprise limits access to internal systems that hold Candidate Data to individuals who need access for the legitimate business purposes referred to in this Notice.

## **Candidate Rights**

You may exercise the following rights in relation to your Candidate Data:

### **Access, Correction and Deletion**

Ameriprise will provide you access to your Candidate Data that Ameriprise holds to the extent required by law in your home country, regardless of the location of the Candidate Data processing. You may request correction or deletion of that Candidate Data, except where retention is required by your contractual relationship with Ameriprise, in the context of a legal dispute, or as otherwise set out in this Notice. If access, correction, or deletion is denied, the reason for the denial will be communicated to you.

## **Automated Decisions**

Ameriprise generally does not make recruiting or hiring decisions based solely on automated decision-making within the meaning of the EU Data Protection Directive (as amended from time to time). In the event that Ameriprise relies solely on automated decision-making that could have a significant impact on you, Ameriprise will provide you an opportunity to express your views and will provide any other safeguards required by law.

## **Inquiries, Complaints and Objections**

Should you have any queries in relation to the processing of your Candidate Data for Europe, the Middle East, and Africa please contact: [DPO@columbiathreadneedle.com](mailto:DPO@columbiathreadneedle.com).

Should you have any queries in relation to the processing of your Candidate Data, for Asia Pacific, please contact: [APACHR@columbiathreadneedle.com](mailto:APACHR@columbiathreadneedle.com).

## **Direct Marketing**

Ameriprise will not use Candidate Data to offer you any products or services for personal or family consumption (“direct marketing”) or provide Candidate Data to third parties for their direct marketing. These restrictions do not apply to contact or other personal data obtained in the context of an existing customer, consumer, or other non-employment relationship with Ameriprise.

## **Changes to this Notice**

Ameriprise reserves the right to modify this Notice by posting changes to relevant Ameriprise websites. If you submit additional Candidate Data or request to be considered for an Ameriprise position following the effective date of a modified Notice, your Candidate Data will be handled in accordance with the Notice in effect at that time.