

# Applicant Privacy Notice

## Introduction

Truliant Federal Credit Union and its affiliated companies and subsidiaries (“Truliant Federal Credit Union”, “we”, “our”, or “us”) will collect and process the information that we receive related to job applicants and employment candidates during the application process. This information may include information that identifies a particular individual, could be used to identify a particular individual (whether directly, indirectly or in combination with other data), or is otherwise linked or reasonably linkable to a particular individual (“Personal Data”). This Applicant Privacy Notice (“Applicant Privacy Notice”) sets out which Personal Data that we collect about you and how we use it. This Applicant Privacy Notice applies to all individuals who apply to be employed by us.

Throughout this Applicant Privacy Notice, we may use the term “processing” to cover all activities involving your Personal Data, including collecting, handling, storing, sharing, accessing, using, disclosing, transferring and disposing of information.

The controller of your Personal Data will be the Truliant Federal Credit Union entity to whom you apply for a position. See this Applicant Privacy Notice for information about how to contact Truliant Federal Credit Union about our information practices or this Applicant Privacy Notice.

## Purposes of Processing your Personal Data

In this Section, we describe the purposes for which we collect and process Personal Data about applicants in compliance with data protection laws. Where required by applicable law, we will obtain your consent to the collection and processing of your Personal Data. If you do not provide Personal Data indicated as mandatory (for example, on our application form), we may not be able to process your application.

Truliant Federal Credit Union may process your Personal Data to:

1. Identify and contact you;
2. Consider your application;
3. Schedule and facilitate interviews;
4. Determine your suitability for current and future job roles with us;
5. Contact references or other individuals who may provide information to us about your employment history;
6. Perform pre-employment screening and testing;
7. Potentially prepare employment terms or an employment contract;
8. Perform financial planning and budgeting;
9. Engage in diversity and equal opportunity initiatives (where permitted and/or required under applicable law);
10. Provide reasonable workplace accommodations and a safe workplace;
11. Make staffing decisions;
12. Enforce our legal rights;
13. Improve and develop our recruitment processes (including by way of candidate experience surveys);

14. Ensure the safety and security of our systems;
15. Audit, research and perform analysis to improve the recruiting experience on our sites;
16. Respond to inquiries, complaints and disputes;
17. Perform certain data analysis regarding use of our recruiting sites and our recruitment programs;
18. Comply with legal and other requirements.

Truliant only processes Personal Data for the above purposes to the extent permitted by applicable law and, where required, only when it can rely on a legal basis. Truliant does not sell job applicant Personal Data.

Personal Data processed for all of these above purposes may include (all as permitted by law):

1. Your name, address, email address, telephone number or other contact information;
2. Your taxpayer identification number or social security number;
3. Position you applied for;
4. How you heard about the position you applied for;
5. Your application letter and job preferences;
6. Your salary requirements;
7. Your salary history;
8. Your veteran status;
9. Your willingness to travel if the position you applied for so requires;
10. Your eligibility to work in the jurisdiction(s) in which the position you apply for is located;
11. Work visa, permit, or other documents evidencing your authorization to work under the applicable immigration laws;
12. Information about your current employment
13. Your educational background, references;
14. Your CV and application details;
15. Your interview and assessment data;
16. Vetting and verification information and your previous experience;
17. Previous (job) experience and your references;
18. Photographs;
19. Your memberships on committees or other bodies;
20. Your language skills;
21. Your computer knowledge;
22. Your special skills including (driver) licenses, professional licenses, interests, leisure activities, other qualifications, activities; and
23. Any other Personal Data necessary or voluntarily given by you in connection with your application.

### **Special Category Data**

To the extent permitted by applicable laws, Truliant Federal Credit Union collects and processes a limited amount of Personal Data that falls into the definition of special categories of Personal Data, sometimes called “sensitive personal data” or “sensitive data.” This category of Personal Data may include: physical or mental health (including details of accommodations or adjustments); trade union membership; racial

or ethnic origin; sexual orientation; religious, political or philosophical beliefs; and criminal records and information regarding criminal offences or proceedings (where permitted by applicable local laws).

Where we process special categories of Personal Data, it will be justified by a condition set out for the position you applied for and also by one of the following additional conditions: (a) the processing is necessary for the purposes of carrying out the obligations and exercising the rights of you or Truliant Federal Credit Union in the field of employment law, anti-discrimination law, social security and social protection law, to the extent permissible under applicable laws, and there is no reason to believe that there is an overriding legitimate interest in not processing the data; (b) the processing is necessary for the assessment of your working capacity, medical diagnosis, to the extent permitted by applicable laws; and (c) the processing is necessary for purposes authorized by applicable law.

### **Retention of your Personal Data**

The Personal Data processed pursuant to your application for employment will be processed in accordance with our data retention guidelines, which apply running from the date from when the hiring process related to the position(s) you have applied for is finished, unless a longer period is necessary for our legal obligations or related to a legal claim.

### **Collection of Personal Data**

Truliant Federal Credit Union mainly obtains your Personal Data directly from you. You may provide this information directly to the hiring manager or relevant recruiter or enter it into our systems. In addition, further information about you may be generated by the relevant recruiter, hiring manager or other employees involved in the recruitment process.

To the extent permitted by applicable law, we may also obtain some information from third parties: for example, references from a previous employer, information from tax authorities, or where we employ a third party to carry out a background check (where permitted by applicable law).

In some circumstances, subject to applicable law, data is collected indirectly from monitoring by, for example, building and location access control and monitoring systems when you come to our premises for an interview, CCTV, telephone logs and recordings and email logs), if and to the extent permitted by applicable laws. In these circumstances, the data may be collected by Truliant Federal Credit Union or a third-party provider of the relevant service. This type of data is generally not accessed on a routine basis but access is possible. Some data may be obtained from publicly accessible sources.

In the event that particular information about you is required by contract or statute, this will be indicated at the time of collection. We will also let you know where there are consequences of you not providing the information requested. Failure to provide some of the information we request of you may mean that we cannot complete the recruitment process.

For example, if you do not provide us with your name or background, we will not be able to consider you for employment. In some cases, it may mean that we are unable engage further with you as Truliant Federal Credit Union will not have the Personal Data we believe to be necessary to reach a recruitment decision.

### **Disclosure and Transfer of Personal Data**

For the purposes listed above, we may share your Personal Data on a need-to-know basis with Truliant employees due to their function within Truliant Federal Credit Union, with external parties or associates, such as applicant verification vendors, law enforcement, courts, regulatory authorities. Truliant Federal Credit Union has taken reasonable steps to ensure that your Personal Data is shared and treated securely and in accordance with this policy and applicable law.

### **Revocation of Consent**

You may, at any time, revoke consents that you have given to Truliant Federal Credit Union pertaining to any such processing of Personal Data that is based on your consent.

You may revoke your consent by contacting Truliant Federal Credit Union via the contact details set forth below. Please indicate details of your consent revocation (which Personal Data, etc.). Upon such revocation, Truliant Federal Credit Union will cease to process your Personal Data relating to the purposes for which your consent has been revoked.

### **Notices of Changes and Additional Privacy Notices**

Truliant Federal Credit Union may change or update this Applicant Privacy Notice at any time. We may undertake certain processing of Personal Data, which are subject to additional Privacy Notices.

### **Are our practices the same for all Applicants?**

The categories of Personal Data that we collect and our use of Personal Data may vary depending upon the position(s) being considered or their location, as well as the associated qualifications and responsibilities. Also, in some cases (such as where required by law), we ask for your consent or give you certain choices prior to collecting or using certain Personal Data.

### **Contact Us**

If you have any questions or concerns regarding the processing of your Personal Data, please contact us via email using the information set forth above, or electronically using the details set forth below:  
[HumanResources@truliantfcu.org](mailto:HumanResources@truliantfcu.org).