

Recruitment Privacy Notice - US

By providing us with your data in connection with recruitment, you agree to the use by Company of the additional personal data which you voluntarily provided in the recruitment application, and which is collected during the recruitment process relating to the job position offered by us. “**Company**” means the applicable StoneX entity which is offering the job position (also referred to as “**us**”, “**our**” or “**we**”). For the purposes of this notice, “**personal data**” used herein shall mean any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you, including “**personal information**” and “**sensitive personal information**” as those terms are defined in the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (together, “CCPA”).

You may withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before such withdrawal.

Who is the controller of your personal data?

The Company is the controller of your personal data.

Which personal data is processed by us, for what purposes, on what legal basis and for how long?

In principle, we obtain your personal data from the recruitment agency involved in the recruitment process or directly from you. We process the personal data contained in the recruitment application provided to us by such agency, data provided by you and generated during the recruitment process (during recruitment meetings, through competence tests). We may also process personal data obtained from background check services providers, or provided to us by a person who referred you to us or your employers (if you consent to our verification of your references) and the data included on publicly available professional and business websites, e.g. your LinkedIn profile, the website of a professional associations you are a member of, or in registers made available by public authorities.

We will process your data for the following purposes and on the following legal bases:

- (a) Your personal data such as identification data, contact details, education, professional qualifications and employment history, date of commencement of work, remuneration is processed for the purpose of taking steps at your request before concluding the contract.
- (b) Your email address and phone number on the basis of our legitimate interests to conduct and manage recruitment in our recruitment system and through phone interviews. For this reason, if you choose to apply to us, we require you to provide us with your email address and phone number.
- (c) Data relating to the verification of your statements made in your application and during the recruitment process, in particular your competences, including data obtained from competence tests (e.g. information on your knowledge and skills), collected by us or a recruitment agency cooperating with us, collected from LinkedIn or other publicly available professional and business websites, in

particular the websites of professional associations you are a member of, in order to pursue our legitimate interests.

- (d) Additional data that you decide to provide voluntarily to us, such as your image or information on your interests, we will process on the basis of your consent.
- (e) In case we need to repeat the recruitment process, we will process for this purpose your data collected in connection with recruitment on the basis of our legitimate interests.
- (f) Where a recruitment agency is involved in your recruitment process, we process your identification data and information on your financial expectations on the basis of legitimate interests in order to perform a contract with that agency.
- (g) If required in the applicable jurisdiction and if permitted by applicable data protection laws, data regarding any criminal convictions you have or which are pending, if you have been made bankrupt (even if discharged), and whether you have any court judgements (or similar) attributable to you on the basis of our compliance with our legal obligations.
- (h) For future recruitment purposes for positions within the Company that match your qualifications based on your consent.
If you have participated or will participate in more than one recruitment and you give us your consent to use the data collected also for future recruitment purposes, then - when conducting such future recruitment - we may use all data collected about you - as long as the one-year period for the processing of the data based on the given consent has not expired.
- (i) In exceptional cases, if any disagreement arises between you and the Company, for the purpose of pursuing and defending against claims, on the basis of our legitimate interests.

How long will we process your data for?

We will process your personal data for the period necessary to carry out the recruitment process for the position you are applying for and to select a candidate, and thereafter, in case we need to repeat the recruitment. We will not process your data for these purposes for more than one year.

The provision of personal data is obligatory in order to take part in a given recruitment process. We may also need your data to take steps at your request to enter into a contract with you or for our legitimate interests. In such a situation, the provision of data is voluntary, but without it we may not be able to process your application. The provision of other data is voluntary.

How will we use your sensitive personal information?

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process, for example whether adjustments need to be made during a test or interview or would need to be made during your employment.
- We will use information about your gender and/or race, if you provide this to us, for aggregate diversity monitoring purposes performed by the HR team only.

Who do we share your personal data with?

We disclose personal data to data processors acting on behalf of the Company for:

- the provision of ICT services such as hosting, provision or maintenance of IT systems, in particular administrators of Internet recruitment portals, recruitment tools providers, HR support providers and other entities from our group acting on our behalf;
- conducting the recruitment processes - recruitment agencies (which may also act as independent controllers) and background check services providers.

We may disclose your personal data in the following cases:

- to persons providing references;
- to other entities from our group, if the recruitment to the position you are applying for is international and such other entities are involved;
- when such an obligation arises from the provisions of applicable law, in particular at the request of the public prosecutor's office, the police and other state authorities;
- where it is necessary to meet our needs, in particular, to our consultants, auditors, postal operators and recruitment agencies;
- The Company will not sell any personal data about candidates obtained in connection with recruitment activities.

Where will your personal data be processed?

Your data will only be transferred outside of your home jurisdiction where this is required for the purposes of processing your application. We will also ensure that appropriate data transfer mechanisms are in place to protect such transfers as required by applicable data protection laws.

What are your rights in connection with our processing of your personal data?

You may have the right to:

- access your data,
- rectify your data,
- request their deletion,
- request the restriction of their processing,
- object to the processing (where we process your data on the basis of legitimate interests),
- transfer the data you have provided (the processing of which you consented to, or which you have provided to conclude a contract) to another data controller,
- withdraw your consent to the processing of personal data at any time. The withdrawal of your consent shall not affect the lawfulness of the processing based on consent before its withdrawal, and
- lodge a complaint with the supervisory authority in your home jurisdiction.

How can you contact us?

If you have any questions, wish to withdraw your consent, or exercise your rights, please contact us by sending an email to: privacy@StoneX.com.