

Applicant Privacy Notice

PURPOSE OF THIS NOTICE: This Applicant Privacy Notice (the “Notice”) describes how we collect and use certain personal information relating to job applicants and candidates for positions with us (“Applicants”). This Notice is intended to satisfy notice requirements under certain applicable laws and to provide you with other information regarding our data collection and use practices. We may provide Applicants additional notices about our data collection practices where required by other laws (e.g., if we conduct a background check or extend an employment offer).

SCOPE OF THIS NOTICE: This Notice applies to the personal information that we collect from and about Applicants, for reviewing, assessing, considering, managing, storing or processing their applications or otherwise considering them for a position with us. The categories of personal information we collect and our use of personal information may vary depending upon the position for which you are applying and the jurisdiction where you reside. We will collect your personal information where permitted by and in accordance with applicable laws.

CATEGORIES OF PERSONAL INFORMATION COLLECTED: Generally, we may collect the following categories of personal information about Applicants:

- **Name, Contact Info and other Identifiers:** identifiers such as a real name, alias, postal address, unique personal identifier, telephone number, online identifier, Internet Protocol address, email address, account name, social security number/social insurance number (or equivalent), driver’s license number, passport number, or other similar identifiers.
- **Protected Classifications:** characteristics of protected classifications, such as race, color, sex, age, religion, national origin, disability, citizenship status, and genetic information.¹
- **Audio/Visual Data:** audio, electronic, visual, thermal, olfactory, or similar information such as CCTV images and photographs, and audio recordings (e.g., recorded meetings/interviews).
- **Employment History:** professional or employment-related information.
- **Education Information:** information about education history or background.
- **Profiles and Inferences:** inferences drawn from any of the information identified above to create a profile about a resident reflecting the resident’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

PURPOSES FOR COLLECTING, USING AND DISCLOSING PERSONAL INFORMATION: Generally, we use the above categories of personal information for the following purposes:

- **Management of Job Applications, Recruiting and Hiring.** To review, assess, recruit, consider or otherwise manage applicants, candidates and job applications, including:
 - Scheduling and conducting interviews
 - Identifying candidates, including by working with external recruiters

¹ This information will only be collected on a voluntary basis, unless otherwise required by law, and it will only be used for legally permitted purposes.

- Reviewing, assessing and verifying information provided; conducting criminal and background checks; and otherwise screening or evaluate an Applicant's qualifications, suitability and relevant characteristics
- Extending offers, negotiating the terms of offers, and assessing salary and compensation matters
- Satisfying legal and regulatory obligations
- Communicating with Applicants regarding their applications and about other similar position(s) for which they may be interested
- Maintaining Applicant personal information for future consideration
- Supporting our equal opportunity employment policy and practices
- **Security and Monitoring.** To monitor and secure our resources, network, premises and assets, including:
 - Monitoring for, preventing, and investigating suspected or alleged misconduct or violations of work rules
 - Monitoring for, preventing, investigating and responding to security and privacy incidents
 - Providing and managing access to physical and technical access controls
 - Monitoring activities, access and use to ensure the security and functioning of our systems and assets
 - Securing our offices, premises and physical assets, including through the use of electronic access systems and video monitoring
- **Auditing, Reporting Corporate Governance, and Internal Operations.** Relating to financial, tax and accounting audits, and audits and assessments of our business operations, security controls, financial controls, or compliance with legal obligations, and for other internal business purposes such as administering our records retention program.
- **M&A and Other Business Transactions.** For purposes of planning, due diligence and implementation of commercial transactions, such as mergers, acquisitions, asset sales or transfers, bankruptcy or reorganization or other similar business transactions.
- **Defending and Protecting Rights.** To protect and defend our rights and interests and those of third parties, including to manage and respond to employee and other legal disputes, to respond to legal claims or disputes, and to otherwise establish, defend or protect our rights or interests, or the rights, interests, health or safety of others, including in the context of anticipated or actual litigation with third parties.
- **Compliance with Applicable Legal Obligations.** Relating to compliance with applicable legal obligations (such as hiring eligibility, responding to subpoenas and court orders) as well as assessments, reviews and reporting relating to such legal obligations, including under employment and labor laws and regulations, social security and tax laws, environmental regulations, workplace safety laws and regulations, and other applicable laws, regulations, opinions and guidance.

- **Other purposes that are authorized by applicable law.** Depending on your jurisdiction of residence, local laws may authorize the collection, use and/or disclosure of your personal information for other identified purposes. We do not sell the personal information, including any sensitive personal information, we collect about our employees or applicants for employment or share it with third parties for cross-context behavioral advertising.

RETENTION PERIOD: we will retain Personal Information for the period necessary to fulfill the purposes outlined in this Notice and in accordance with our Records Retention Schedule, unless a longer retention period is required or permitted by law. Please note, the information collected about you during the job application process may become part of your personnel file and may be used to administer the employment relationship and for related reporting and recordkeeping purposes should you be hired by the Company.

ADDITIONAL INFORMATION AND ASSISTANCE: A copy of our Privacy Policy is available at: <https://www.tompkinsbank.com/privacy-policy>. If you have any questions about this Notice or need to access it in an alternative format due to having a disability, please contact us, **toll-free, at 888-273-3210**