

General Bank of Canada

Applicant Privacy Statement

At General Bank of Canada (the “Bank”, “we”, “us”, “our”), we respect your privacy and value our relationship with you. This means we are committed to respecting and protecting your Personal Information.

We collect and process Personal Information relating to applicants as part of our recruitment process. This Applicant Privacy Statement (“Statement”) informs you of the practices that we have in place for the collection, use, disclosure, and retention of your Personal Information, along with your rights to access your Personal Information. The Statement is based on our obligations under the [Personal Information Protection and Electronic Documents Act \(Canada\)](https://laws-lois.justice.gc.ca/PDF/P-8.6.pdf) (<https://laws-lois.justice.gc.ca/PDF/P-8.6.pdf>).

The Statement applies to all applicants (internal and external) who apply for a role, or express interest in working at the Bank and who submits their Personal Information to the Bank’s Human Resources Department.

The Bank may update this Statement from time to time to ensure it accurately reflects our current practices. If we make a change to this Statement, we will post the revised Statement on our website and make it available to you upon your request.

Last updated April 18, 2023.

What is Personal Information?

“**Personal Information**”, as it relates to recruitment, is any information that identifies you as an individual or can be used to identify you. It includes information in any form, such as:

- name, age, physical mailing or email address, telephone number, date of birth, gender, residence status, nationality;
- unique identification numbers (e.g., social insurance number (SIN), driver’s license number);
- financial information, and credit records (including credit history);
- details of your qualifications, skills, experience, and employment history, and
- whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process.

Collection, Use, and Disclosure of Personal Information

Collection

Personal Information will be collected by fair and lawful means. We limit the collection of Personal Information to that which is necessary for the purposes identified by us or permitted by law. The Bank collects a range of information from you during the recruitment process, which may include, but not necessarily be limited to the information defined above.

We collect this information in a variety of ways, for example in application forms, resumes, or through interviews. We may also collect information on you from third parties that you have agreed can share your Personal Information with us, such as recruitment websites, or from publicly available sources, such as professional sites like LinkedIn, to review information related to your application, assess employment suitability, or verification purposes.

The Bank protects Personal Information through security safeguards appropriate to the sensitivity of the information. These safeguards employed to protect Personal Information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification, include:

- Physical safeguards (e.g. locked filing cabinets, restrictions on building access, alarm security);
- Organizational safeguards (e.g., privacy audits, policies, and procedures); and
- Technological safeguards (e.g., password use, encryption).

Use

We will use Personal Information that has been collected during the recruitment process for the legitimate and necessary purposes of the Bank, including assessing your suitability for employment at the Bank in the recruitment process and verification checks.

As part of the recruitment process, we will use your Personal Information to undertake a variety of assessments and background checks to verify that you have the skills and experience and to comply with our regulatory and legal requirements. If you are successful, in accordance with local law, background checks may include, but are not limited to, credit reference and criminal record checks, address verification, academic qualifications and employment references.

Disclosure

Access to Personal Information is limited to individuals who have a business need, such as the Human Resources Department or employees involved in the recruitment process. We will only disclose your Personal Information in accordance with applicable privacy legislation, which may include:

- with your consent;
- in response to a court order, search warrant or other demand or request, which we believe to be valid;
- to meet requests for information from regulators, including self-regulatory organizations of which we are a member or participant;
- to satisfy legal and regulatory requirements applicable to us;
- to facilitate investigations by law enforcement, or disclosure to government agencies;
- to third parties the Bank has contracted with to perform services on our behalf, to manage our relationship with you;
- sharing it with credit reporting agencies and background check agencies to verify your credit reference and criminal records; and
- where permitted by law.

Personal Information will not be disclosed for purposes other than those for which it was collected, except when you have otherwise consented, or as required or permitted by law. The Bank may engage third parties for all or part of the recruitment process.

When we share Personal Information with third parties, we require them to protect the Personal Information in a way that is consistent with our privacy requirements. Some of our service providers may store data outside of Canada. Personal Information held and controlled by a third party in another country may be subject to the laws of that jurisdiction, and may be collected, used, or disclosed without your knowledge or consent where required or permitted by the laws of that jurisdiction.

Retaining Your Personal Information

We have a record retention policy and procedure in place for the retention of Personal Information in accordance with legal requirements. The Bank adopts appropriate risk management practices when Personal Information is no longer necessary or relevant for the identified purposes, nor required to be retained for a business purpose.

If your application for employment is successful, we will retain your Personal Information for the ongoing administration of your employment relationship, in line with the Bank's record retention procedures, and in compliance with any legal requirements. Further privacy policies will be provided to you as part of the offer process.

If your application for employment is unsuccessful, we will hold your data on file for consideration of future employment opportunities. You may opt out of this process using the Contact information below.

Contacting Us

Access to Personal Information

You have the right to access the Personal Information that the Bank holds about you, subject to legal restrictions. Upon written request and proof of identity, the Bank will confirm the existence, use, and disclosure of your Personal Information, and subject to any legal restrictions but in a timely manner, provide access to that information. You will be able to challenge the accuracy and completeness of the information, and have it amended as appropriate.

The Bank may charge you a small fee for requesting copies of Personal Information and may not be able to provide access to certain information in all circumstances. For example, some situations where the Bank may not be able to provide access to Personal Information include where that information:

- contains references to the Personal Information of other individuals;
- cannot be disclosed for legal, security, or commercial propriety reasons; or
- is subject to solicitor-client or litigation privilege.

If you request access to Personal Information which the Bank cannot provide, we will provide you with the reasons for denying access to the information.

To request access to your Personal Information, or if you have questions about this Privacy Policy or our privacy practices, you may contact our **Chief Privacy Officer** at:

Mail:

Attention: Chief Privacy Officer (CPO)
#100 LeMarchand Mansion

11523 – 100 Avenue NW
Edmonton, AB T5K 0J8

Email:

privacy@generalbank.ca

Raising Concerns, Opting Out or Withdrawing Consent

You are under no obligation to provide your information to us during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly or at all.

To discuss concerns about our privacy practices, to opt out or withdraw consent for the collection, use, or disclosure of your Personal Information, please contact our Human Resources Department at:

Email: hr@generalbank.ca

We will review and respond to concerns about the Bank's policies and practices related to the handling of Personal Information and will investigate all complaints. If justified, the Bank will take appropriate measures to resolve the complaint, including, if necessary, amending our policies and practices. You can raise it directly with our privacy regulator, **Office of the Privacy Commissioner of Canada** at:

Mail:

Office of the Privacy Commissioner of Canada
30 Victoria Street
Gatineau, Quebec K1A 1H3

Telephone:

Toll-free: 1-800-282-1376

Website:

www.priv.gc.ca

Digital Privacy

For information on how we use cookies or analytics on our website, please visit our [Privacy Policy](http://www.generalbank.ca/privacy-policy/) (www.generalbank.ca/privacy-policy/).