



Company Recruiting Privacy Policy

21st Century Bank is committed to respecting your privacy and protecting your personal data. We define personal data broadly as information that directly identifies an individual or that makes an individual identifiable when combined with other information.

This Recruiting Privacy Policy ("Privacy Policy") describes how we handle and protect your personal data in connection with 21st Century Bank's recruiting processes and programs. In case of a conflict between this Privacy Notice and applicable law, applicable law will govern.

This Privacy Policy only applies to the personal data of job applicants and potential candidates for employment. By submitting your personal data to us, you acknowledge that:

- You have read and understood this Privacy Policy and agree to the use of your personal data as set out herein
- You are not required to provide any requested information to us, but your failure to do so may result in our not being able to continue your candidacy for the job for which you have applied
- All of your representations are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information of an adverse nature. Providing any inaccurate information may make you ineligible for employment
- This Privacy Policy does not form any contract of employment offered to candidates hired by 21st Century Bank

Personal Data We Collect

The types of personal data that we request from you and the ways that we process it are determined by the requirements set in place by the Federal and State laws. We usually collect personal data directly from you when you apply for a role with us through our online application process, such as:

- Name
- Address
- Contact information
- Work and educational history
- Identity documents
- Information that may be required due to legal requirements (e.g., residence or work permits)
- Other categories of data that you voluntarily decide to share with us

We also collect data about you which is created by our recruiting personnel in the course of their interactions with you during the recruiting process or through your voluntary participation in this process.

If you receive an offer from us, we may then conduct a background check and, to the extent permitted by applicable law, we may also collect data related to criminal offences and proceedings as well as credit information. We also collect similar personal data about you from third parties, such as professional recruiting firms, your references, prior employers, 21st Century Bank employees with whom you have interviewed or who recommended your candidacy, and, to the extent permitted by applicable law,

employment background check providers. We may also collect personal data about you online to the extent that you have chosen to make this information publicly available on professional social media websites. For example, we may find your profile on LinkedIn and contact you about suitable roles. Sensitive personal data is a subset of personal data that includes ethnicity, health, philosophical beliefs, and other categories as prescribed by law. We may collect sensitive personal data about a candidate to the extent permitted or required to do so by applicable laws (e.g., U.S. equal opportunity laws) and to support our efforts to create an inclusive and diverse work environment. Under limited circumstances and to the extent permitted by applicable law, we may also collect sensitive personal information relating to health and medical characteristics, to provide reasonable accommodations to facilitate the interview process (in case of disabilities).

Use of Your Personal Data

We collect and use your personal data for legitimate human resources and business management reasons, including:

- Identifying and evaluating candidates for potential employment, as well as for future roles that may become available
- Maintaining records in relation to recruiting and hiring
- Ensuring compliance with legal requirements, including those relating to public health and workplace safety
- Fostering our diversity programs and practices
- If you receive an offer from us, conducting background checks, including, to the extent permitted by applicable law, criminal history checks
- Protecting our legal rights to the extent authorized or permitted by law
- Protecting the workplace and communicating with medical professionals, law enforcement, or other public authorities in the event of an emergency or public health event, such as when the health or safety of you or one or more individuals may be endangered

We may also use your personal data for 21st Century Bank's analytics purposes to improve our recruitment and hiring process and augment our ability to attract successful candidates.

Legal Basis for Processing Your Personal Data

Our processing of your personal data for the purposes mentioned above is based in one or several of the following legal grounds:

- In part, on our legitimate business interests in evaluating your application to manage our relationship with you, to ensure that we recruit appropriate employees, and to evaluate and maintain the efficacy of our recruiting process more generally; and in operating our business and protecting the Bank and its employees, clients, and third parties. When we rely on this legal ground, 21st Century Bank will only process your personal data after assessing the adequacy, proportionality, and legitimacy of the data processing activity
- In part, on our performing contractual and precontractual measures relating to our potential employment relationship with you
- In part, on our complying with applicable law with regard to personal data necessary to satisfy our legal and regulatory obligations, including with regard to public health and workplace safety
- In part, on your consent, if we collect sensitive personal data for legally permitted purposes other than compliance with our legal obligations regarding public health and workplace safety

Background & Credit Screening

If you receive an offer from us, we may conduct a background and credit check on you or instruct a third party to do so on our behalf. Background and credit screenings will only be done where permitted by the law applicable to the position to the extent necessary and proportionate to the role that you are being offered. A background and credit check will only involve criminal background data and credit data to the extent permitted by law. Our legal basis for background and credit screening is our need to perform precontractual measures related to establishing our employment relationship. If a background and credit screening is required, you may be contacted by a third-party background screening service provider to request authorization for the release of your information, and at that time you will be provided with further information about the process and what personal data it might involve.

Data Recipients and international data transfers

Your personal data may be accessed by recruiters and interviewers performing administrative functions. IT personnel within 21st Century Bank may also have access on a need-to-know basis to your personal data to the extent necessary to perform their jobs. We have put in place legal mechanisms designed to ensure adequate data protection for your personal data when it is processed by 21st Century Bank subsidiaries, affiliates, and service providers.

We use third-party service providers to provide a recruiting software system. We also share your personal data with other third-party service providers that may assist us in identifying and recruiting talent, administering, and evaluating pre-employment screening, and improving our recruiting practices. Except to the extent necessary to accomplish the Bank's uses and purposes described in this Privacy Policy, we do not disclose your personal data to third parties. We also prohibit our service providers from using your personal data for non-Bank purposes. We do not otherwise share or sell your personal data to third parties.

We maintain processes designed to help ensure that any processing of personal data by third-party service providers is consistent with this Privacy Policy and protects the confidentiality, availability, and integrity of your personal data in compliance with applicable law. We may use data analytics and algorithms to help us to review the large quantities of candidates and application data that we receive. These algorithms help us prioritize the application review process and sort candidates based on professional characteristics that suggest capabilities necessary to perform the relevant role. The results are considered in combination with other information about the candidate and each candidate's assessment is based on human judgment. We evaluate each individual candidate on their own merits. Certain roles may require specific prerequisites or skills (for example, particular professional qualifications or the number of years in a similar role). Applications that do not meet those requirements may be automatically rejected.

Data Retention

If you accept an offer of employment with us, any relevant personal data collected during your pre-employment period will become part of your personnel records and will be retained in accordance with specific legal requirements. If we do not employ you, and unless you object by following the process described in the Section "Your Rights" below, we may nevertheless continue to retain and use your personal data for a period of time for system administration purposes, to consider you for potential future roles, and to perform research. Thereafter, we retain a minimal amount of your personal data to record your recruiting activity with us.

To the extent that we have collected personal data, including sensitive personal data, for the specific purpose of fulfilling our legal obligations regarding public health or workplace safety, we will retain that data for the duration of those legal obligations. Thereafter, we retain a minimal amount of your personal data to establish our compliance with those obligations.

Security

We use generally accepted standards of technical and operational security to secure your personal data. Only authorized personnel of 21st Century Bank and of our third-party service providers are permitted to access personal data, and these employees and third-party service providers are required to treat this information as confidential. Despite these precautions, we cannot guarantee that unauthorized persons will not obtain access to your personal data.

Your Rights

We take reasonable steps that are designed to keep your personal data accurate, complete, and up-to-date for the purposes for which it is collected and used. We also have implemented measures that are designed to help ensure that our processing of your personal data complies with this Privacy Policy and applicable law. Subject to applicable law, including exceptions, you have the following rights regarding the personal data that we collect about you:

- Right to request information about the personal data that we hold about you, including information about how we use your personal data
- Right to request a copy of the personal data that we hold about you
- Right to request portability of your data to permit you to provide a copy of your personal data in a structured, commonly used, and machine-readable format and to transmit that personal data to another controller
- Right to request that we correct or otherwise amend your personal data if it is not correct or otherwise not complete, timely, and accurate for the purposes for which we are using it
- Right to request deletion of your personal data
- Right to request that we cease processing or restrict or limit the processing of your personal data
- Right to withdraw your consent to our processing of your personal data where the basis of our processing is your consent. This right may not apply if there are other legal justifications to continue processing or we need to retain certain personal data where required or permitted under applicable law
- Right to not be discriminated against for exercising your individual rights regarding your personal data
- Right to request review by 21st Century Bank's Human Resources Representative and, if applicable, an IT Representative, of our response to your request to exercise your individual data protection rights
- Right to seek additional legal remedies regarding our response to your request to exercise your individual data-protection rights by lodging a complaint with your data-protection authority or initiating a legal proceeding

If you would like to exercise your data protection rights regarding your personal data, you can do so by providing the following information:

- First Name:
- Last Name:
- Primary Email Address:

- Phone Number:
- Any Additional Information:

To:

- HR@21stcb.com, or
- Contacting us by postal mail at 21st Century Bank Attn: Privacy/Human Resources
43 Main Street SE Suite 144, Minneapolis, MN 55414

Upon receipt of your request to exercise your data protection rights, we will acknowledge receipt within the time period required by applicable law and provide you with information about the next steps in the process and the timing. To help protect your privacy and security, we may take reasonable steps to verify your identity before acting on certain data protection rights, in accordance with applicable law. If you are using an authorized agent to exercise your data protection rights and that agent does not provide a power of attorney with the initial request, we may request further evidence of the agent's right to act on your behalf, including valid written authorization or contacting you to verify the request. Please note that applicable laws include exceptions to assertions of data protection rights that may prevent us from providing access to your personal data or otherwise fully complying with your request. If we believe exceptions apply, we will respond to your request to the extent we are able to do so, and we will provide an explanation of the basis for not complying wholly or partially with your request.

Cookies and Other Tracking Technologies

21st Century Bank may use cookies and similar tracking technologies to manage our sites and services. These technologies could be used to collect personal information about you through your computer or mobile device as well as personal information you provide online during the application and recruiting processes the company. The Bank may collect information about whether you open or click any links in the knowledge, research, or event communications that we send you. You have options regarding our use of cookies and other tracking technologies.

In addition, we use tools and applications that reduce security threats and reduce the risk of access by bots and automated devices, but we do not use those tools and applications for non-security purposes. Some of our online recruiting activities are hosted by third parties. When you access sites operated by these third parties, they may to the extent permitted by applicable law, including your consent to the extent required, and consistent with this Privacy Policy, place their own Cookies or other tracking technologies on your device.

Please refer to our [Privacy Policy](#) for more information

Contacts

If you have any questions about our Company Recruiting Privacy Policy or if you would like to communicate with us, please contact us at HR@21stcb.com or

21st Century Bank – Human Resources Department, Attn: Privacy
43 Main Street SE Suite 144, Minneapolis, MN 55414

21st Century Bank reserves the right to modify this Privacy Policy as required by changes to our business processes or applicable law. We will post any changes to our Privacy Notice on this page. Please check this page regularly to keep up-to-date.