

# Applicant Privacy Statement

## Introduction

Earning and maintaining trust is at the core of providing financial services. At CWB Financial Group, we understand this requires that we respect your privacy and protect the personal information you place in our care. This Applicant Privacy Statement outlines:

- the types of personal information that we may collect about you in relation to your application for employment with CWB Financial Group; and
- how we collect, use and disclose personal information.

Please read this Statement carefully to understand our policies and practices for collecting, using, retaining, and disclosing your personal information. Providing your personal information is voluntary. However, if you choose not to provide the information requested for your application, our ability to consider your application may be limited. By applying for employment, and by sharing personal information with us, you agree that you understand, accept, and consent to the practices described in this Statement. If you do not agree with our policies and practices, you may choose not to apply for employment with CWB Financial Group.

In this Statement:

- “applicant” means an individual who has applied for or expressed interest in employment with CWB Financial Group;
- the words “we,” “us,” and “our” refer to CWB Financial Group, which is comprised of Canadian Western Bank and its subsidiaries. You can find more information about CWB Financial Group at [cwb.com/en/our-companies](https://cwb.com/en/our-companies).

## What is Covered by this Statement

This Statement applies to CWB Financial Group’s collection, use, and disclosure of personal information we collect about applicants during and in relation to the recruitment process. Privacy laws in Canada generally define “personal information” as any information about an identifiable individual that can be used on its own or with other information to identify, contact, or locate a single person.

This Statement does not apply to information about any individual who is not an applicant. You can learn more about our policies and practices related to privacy more generally at [cwb.com/about-us/privacy](https://cwb.com/about-us/privacy).

## Why We Collect Your Personal Information

We collect personal information about applicants to facilitate the recruitment process, including:

- to assess your suitability for employment and make hiring decisions;
- to manage your application for employment and undertake pre-hire and onboarding activities;
- to verify your identity and conduct background and reference checks;
- to communicate with you;
- to perform administrative functions related to the recruitment process;
- to perform data analytics to better understand who is applying for employment with us, assist with the sourcing and screening (but not for final recruitment decisions), and support our people and business strategies; and

- to comply with legal and regulatory requirements.

## What Personal Information Do We Collect and How

Most of the personal information we collect about you will be collected directly from you. This generally occurs through websites and digital tools (such as our human resources information system), documentation or electronic messages you provide to us, or direct interactions with you. We may also collect information from other sources, such as:

- your previous employers;
- publicly available information, such as data available on social media or through an internet search;
- third-party recruiters, staffing companies, or job search or networking websites; and
- background checks, either conducted directly by us or on our behalf by a third-party provider that we engage for that purpose.

The personal information that we may collect about you is described below:

- identifiers, such as your legal and preferred name, mailing address, email address, phone number, date of birth, and identification documents and numbers;
- personal and emergency contact information, and family and dependent information;
- information to assess potential conflicts of interest, including information about your other professional activities and affiliations;
- recruitment information, such as the opportunity applied for, desired compensation, job preferences, willingness to relocate, information you provide to us in résumés, letters, writing samples, other written materials, photographs or videos, education and employment background, transcripts and certificates, evidence that you are legally eligible to work in Canada, information about your skills and qualifications, whether you are subject to a restrictive covenant or other prior employer obligations, current and past compensation where legally permissible, and any other information you provide in relation to your application for employment;
- personal characteristics, including age, sex, gender identity, marital status, family status, ethnicity, religious beliefs, sexual orientation, and disability status only where legally required or with your consent, such as to support our equity, diversity, inclusion and talent management practices (some of these personal characteristics are optional to provide, and will be marked as such);
- to the extent legally permitted or required, information about your health or disability status in relation to accommodations that you may request during the recruiting process;
- images, audio recordings and video recordings captured through CCTV and other security systems when visiting our offices or captured in the course of recruitment events or video recruitment interviews;
- information about your prior employment, education, credit history, criminal records or other data collected during background checks; and
- information generated by your participation in psychological, technical or behavioral assessments (you will receive more information about the nature of such assessments before you participate in any of them).

## Who We Share Your Personal Information With

We may disclose your personal information in the following circumstances:

- within CWB Financial Group in relation to human resources and business functions;

- with third parties and service providers that we use to deliver our human resources and business functions (these third parties include the providers of our technology tools and platforms, recruitment agencies, third-party application portals, and background check providers);
- where disclosure is required by law;
- in cooperation with law enforcement and government agencies where we believe in good faith that we are legally required or permitted to disclose it;
- to prevent, detect and investigate illegal activity;
- to respond to an emergency or protect the personal safety of individuals on our property;
- with our professional advisors, such as attorneys and accountants; and
- when you have consented to the disclosure.

We take all reasonable steps to ensure that personal information is not disclosed without proper authorization.

## Storage and Retention

### Storage

Depending on the nature of the personal information, it may be stored in a CWB facility, in our computer systems or in the record storage facilities or computer systems of our third-party service providers.

Information may be stored and processed in any country or province where we have affiliates or service providers. Some third-party service providers to which we transfer personal information may be based outside of Canada in jurisdictions that have different data protection rules. Your personal information may be securely used, stored or accessed in other countries and be subject to the laws of those countries. For example, information may be shared in response to valid demands or requests from government authorities, courts and law enforcement officials in those countries.

### Retention

We will only retain personal information that was collected in accordance with this Statement or that was collected with your consent. Information may be retained in physical or digital format. We will only retain your personal information for as long as necessary to fulfill the purposes we collected it for or for such longer periods as may be required or authorized by law. We maintain a retention policy which sets time periods for the destruction of records containing personal information.

If you are given and accept an offer of employment with CWB Financial Group, the personal information collected during the pre-employment period will become part of your employment records and will be retained throughout and for a period of time after your employment in accordance with applicable internal policies and procedures.

If CWB Financial Group does not employ you, we may nevertheless continue to retain and use personal information collected in order to consider you for new positions and to refer back to an earlier application if you apply for employment with us again in the future. You may request that your applicant data be purged from our system any time after the decision about your initial application is made.

## Protection

We use a variety of security measures to protect records containing personal information and to prevent the unauthorized access, use, disclosure, or destruction of such records.

## **Accountability and Safeguards**

We have a Chief Privacy Officer to oversee CWB Financial Group's privacy management program, which includes setting policies and procedures and monitoring their effectiveness. We use administrative, physical and technological safeguards to protect your personal information against accidental loss and from unauthorized access, use, alteration, and disclosure.

## **Employee Education and Ethical Conduct**

We employ technical and other safeguards to limit who within CWB Financial Group has access to your personal information. New employees are required to undergo privacy training as part of their employee onboarding experience and then on a recurring basis during employment. Each employee is expected to respect and protect any personal information that they may be able to access. Privacy principles, such as only accessing information for legitimate business purposes, are embedded in our employee Code of Conduct. Failure to abide by our Code of Conduct will result in appropriate disciplinary measures, which may include dismissal.

We use technology to support and enhance our people and processes, but we do not rely on fully automated tools to make decisions about individuals based on personal information. We have procedures in place to maintain human oversight and accountability for all technology in use.

## **Third-Party Service Provider Controls**

We assess the privacy management practices and controls of third-party service providers prior to providing them with any personal information. Once satisfied that a service provider protects personal information in a manner consistent with our own, we will only provide the service provider with the personal information necessary for it to deliver the contracted service. We require all third-party service providers to keep personal information confidential, use it only for the purposes for which we disclose it to them, and to process the personal information in accordance with the same standards set out in this Statement.

## **Anonymization**

In some circumstances we may anonymize your personal information so that it can no longer be associated with you. We reserve the right to use anonymized data for any legitimate business purpose without further notice to you or your consent.

# **Your Privacy Rights**

## **Your Consent**

We obtain consent to the practices and policies outlined in this Statement when individuals apply for employment. We further obtain consent with any new collection, use, or disclosure of personal information when required. We do not obtain consent in circumstances where we're authorized or required not to do so. You may have the legal right to withdraw your consent under certain circumstances and can contact the Privacy Office, with the contact information provided below, to discuss this.

## **Accuracy of Your Personal Information**

We make business decisions based on the information we have about you, and so it's important that the information we have about you is accurate. You're responsible for the accuracy of the information they provide to us. You have the right to and should notify the us when information changes so that it can be updated accordingly.

## **Accessing Your Personal Information**

If you would like access to personal information we have about you or more details about how we handle and retain that information, you may submit a written request to the Chief Privacy Officer. Upon receiving such a request, we may request

specific information from you to help us confirm your identity and your right to access the personal information that we hold about you.

We endeavour to provide you with the information we have as soon as practicable. However, there may be instances where access may be restricted as permitted or required by law. Examples may include information that is subject to legal privilege, information that could reveal personal information about another individual, information containing confidential commercial information, or information relating to a third party. If we cannot provide you with access to your personal information, we will inform you of the reasons why, subject to any legal or regulatory restrictions.

### **Contact Information**

If you have any questions or concerns about this Privacy Statement, our privacy practices, or if you would like to review your personal information, please contact the CWB Privacy Office at:

Chief Privacy Officer  
CWB Financial Group  
3000-10303 Jasper Avenue  
Edmonton, Alberta T5J 3X6  
[privacy@cwbank.com](mailto:privacy@cwbank.com)

You may also seek advice and direction on any privacy related matter from the Office of the Privacy Commissioner of Canada or a provincial Privacy Commissioner having jurisdiction. However, we encourage you to first give us the opportunity to address any concern by contacting our Chief Privacy Officer.

### **Changes to this Statement**

Changes in technology, law, or our business may require us to amend this Statement so that it remains relevant, accurate, and aligned with privacy best practices. At any time, you may review the most current version of this Statement on our careers website or by requesting a copy from us.