

Fidelity Applicant Privacy and Protection Policy and Notice

Last Updated: August 2024

FMR LLC or, depending on your location, one of its global subsidiary companies (“Fidelity”, “us,” and “we”) value your trust and are committed to the responsible management, use, and protection of your personal information. This Applicant Privacy and Protection Policy and Notice (“Notice”) is applicable to all personal information collected by Fidelity to facilitate your application for a job within Fidelity, either in paper form (offline) or electronically (online) using our Fidelity Careers Sites (“Careers Site(s)”). Careers Sites include those Fidelity websites and web pages dedicated to employee recruitment across Fidelity business entities and geographical locations.

We operate these Careers Sites to support Fidelity’s global recruitment functions. In this notice, (i) “Fidelity”, “us” and “we” refer to FMR LLC (however, if one of its global subsidiary companies is identified as being the owner or provider of this Website, then “Fidelity”, “us” and “we” refer to that subsidiary company) and (ii) “Fidelity Companies” mean Fidelity and its corporate affiliates, such as the other businesses that are part of the Fidelity Investments family of companies.

- [Your Digital Privacy](#)
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Information You Provide

This Notice covers any personal information you provide to apply for or search for a position at Fidelity. If you make use of the Careers Site(s), or provide information in written or other form, as part of the job application or job search process, information collected may include;

- name and contact information;
- log-in and password;
- CV, resume, cover letter, previous work experience and education information;
- employment preferences, willingness to relocate, desired salary;
- professional and other work-related licenses, permits and certifications held;
- language and other relevant skills;
- awards and professional memberships;
- eligibility to work in country where job applied for is located, available start date; and
- information relating to references;
- Other requested information or information you choose to provide.

You may also voluntarily choose to provide other relevant information as part of your application. We would prefer you avoid providing the following sensitive personal information, (except where such information is legally required or specifically requested for a legitimate business interest as described in the “Demographic Data” section below): information on race,

color, religion, ethnicity, nationality or national origin, age, gender or gender identity, personal life or sexual orientation, marital or familial status, medical or health information (including disability status), genetic or biometric information, political or philosophical beliefs, political party or trade union status, background check information, judicial data (such as criminal records or information on other judicial or administrative proceedings), military veteran status, and any other protected class information recognized by applicable law in the jurisdiction in which you reside. To the extent the personal information you provide as part of your CV/resume, your job evaluations, or educational records contains the information referenced in this paragraph you expressly authorize Fidelity to process such details if relevant for the purposes of your job application.

Any information you provide must be true, complete, and not misleading. Should the information provided be inaccurate, incomplete, or misleading, this may lead to a rejection of your application during the application process or disciplinary action including immediate dismissal if your application resulted in employment with Fidelity. If you intend to provide us with details of a reference or any other third party as part of your CV/resume, it is your responsibility to obtain consent from that third party prior to passing the contact information to us.

You are responsible for the content of the information you provide to us, and you must ensure it does not infringe on any third party's rights or is not otherwise legally actionable by such third party.

Information from Other Sources

Fidelity may obtain information about you from a variety of sources, including professional services firms (e.g., recruiting agencies, headhunters), online social media and employment platforms, other publicly available information, people who referred you to us, your references or, as permitted by applicable law, from a background check report in connection with your application.

Purposes for Which We May Use and Disclose Personal Information

We collect and process personal information to manage our prospective employment and/or contractual relationship with you, in order to:

- process your application;
- assess your capabilities and qualifications for a job;
- conduct reference checks;
- provide to you any services available on the Careers Site(s) from time to time;
- communicate with you;
- comply with or monitor compliance with any applicable law or regulation;
- monitor your use of Careers Site(s) and your interactions with Fidelity and our service providers (e.g., websites, emails, video);
- conduct background checks if you are offered a job;

- preserve our other legitimate interests, for example, in connection with any disputes; and perform other administrative and business activities, such as aggregate management reporting, internal training, assessing, and improving our recruiting and hiring practices, and as generally required to conduct our business.

The information about you will be added to Fidelity's candidate database and can be retained and used to consider you for certain future opportunities with us other than the one(s) for which you apply. If you do not wish us to do this, please contact us at Staffing@FMR.com.

The information you provide may be processed and stored in the United States or other countries depending on the location of the job. It may be reviewed and processed for the purposes above by employees, consultants, and/or service providers of Fidelity affiliates around the world.

If we elect to make you an offer of employment, personal information you provide or Fidelity obtains from other sources, as described in this Notice, may be incorporated into our human resources systems and used to manage the hiring and orientation process. If you become an employee, any personal information you provide or Fidelity obtains from other sources, as described in this Notice, may become part of your employee file and may be used for other employment-related purposes.

Your provision of personal information to us is voluntary. Please note, however, failure to provide sufficient information may result in Fidelity being unable to consider your employment application, or if employment is offered, your subsequent promotion, transfer or relocation.

Disclosure of Personal Information

Personal information about you may be reviewed by Fidelity employees or agents who have a business need to access such personal information and may include recruiters, human resources personnel, technical services personnel and managers or their designees. Fidelity will remain responsible for personal information that is jointly used with affiliates.

We may share personal information about you with selected service providers or consultants acting on our behalf, such as third parties assisting Fidelity with the operation of the Careers Site(s). Third parties will be required to use appropriate measures to protect the confidentiality and security of personal information.

Fidelity may also use or disclose personal information about you in order to: (1) protect the legal rights, privacy or safety of Fidelity or its employees, agents and contractors; (2) protect the safety and security of visitors to our web sites or other properties; (3) protect against fraud or other illegal activity or for risk management purposes; (4) respond to inquiries or requests from government or public authorities, including authorities outside your country of residence; (5) permit us to pursue available remedies or limit the damages that we may sustain; (6) enforce our Terms of Use; or (7) comply with the law or a legal process, including laws outside your country of residence.

Fidelity also may transfer any and all information that we collect about you to third parties in the event of any merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Fidelity's assets or stock (including without limitation in connection with any bankruptcy or similar proceedings).

Demographic Information

As set forth above, Fidelity requests that you avoid sending sensitive personal information to Fidelity unless required by law or pursuant to a specific request from Fidelity. Fidelity may request certain demographic data as part of the application process, including gender, race and sexual orientation, for the sole purpose of tracking diversity of our candidate pool and workforce. Providing this information will be voluntary, and Fidelity will ask for your consent before completing the form. This information will be viewable only by those members of Human Resources tasked with monitoring the diversity of the workforce. This information will not be shared with or viewable by any staffing member or hiring manager involved with assessing your candidacy or with hiring decisions.

Data Retention

Personal information of candidates applying for jobs will be retained in accordance with local law, and with Fidelity internal practices for the purpose of considering such information for other opportunities. If you do not wish us to retain your information in connection with consideration for other opportunities, please contact staffing@fmr.com. Note that Fidelity may delete personal information about you at any time (including your CV/resume), without any reason or notice, subject to Fidelity's data retention obligations, policies, and any applicable legal or regulatory obligations or for the period of time permitted by local laws. Therefore, please retain your own copy of the personal information provided to us.

How We Protect Information about you

We implement and maintain physical, administrative, technical and organizational measures designed to protect personal information and we regularly adapt these controls to respond to changing requirements and advances in technology. We restrict access to personal information to those who require it to support the candidate application process and to operate our business.

Your Digital Privacy

When you interact with our Careers Site(s), Fidelity manages personal information in accordance with the practices and safeguards described in this policy.

Fidelity hereby disclaims, as far as permitted by local laws, any liability for itself and its affiliated companies, service providers and contractors for any of your information sent to our Careers Site(s) which is lost, misused, illegally accessed, disclosed, altered or destroyed or not integrally or timely delivered to our Careers Site(s).

When you use our Careers Site(s), we may collect technical, navigational and location information, such as device type, browser type, Internet protocol address, pages visited, and average time spent on our Careers Site(s). We use this information for a variety of purposes, such as maintaining the security of your session, facilitating site navigation, improving Careers Site(s) design and functionality, and personalizing your experience.

Cookies and Similar Technology

Fidelity and our third-party service providers use cookies and similar technologies (“cookies”) to support the operation of our Career Sites and other Fidelity websites. Cookies are small amounts of data that a website exchanges with a web browser or application on a visitor’s device (for example, computer, tablet, or mobile phone). Cookies help us to collect information about visitors to our websites, including date and time of visits, pages viewed, amount of time spent on our sites, or general information about the device used to access the site. Fidelity cookies are also used for security purposes and to personalize your experience, such as customizing your screen layout.

Both Fidelity and third-party service providers we hire, such as Google and Meta, may use cookies and other technologies, such as web beacons, tags, or mobile device ID, in online advertising as described below. Most browsers and mobile devices offer their own settings to manage cookies. If you use those settings to refuse or delete cookies it may negatively impact your experience using our sites as some features and services on our digital offerings may not work properly. For example, you may not be able to sign in and access your account, or we may not be able to recognize you, your device, or your online preferences. Depending on your device and operating system, you may not be able to delete or block all cookies.

We may collect analytics data or use third-party analytics tools such as Google Analytics to help us measure traffic and usage trends for our digital offerings, to improve the effectiveness of our online advertising and to understand more about the demographics of our users. You can learn more about Google's practices with Google Analytics by visiting Google's privacy policy. You can also view Google's currently available opt-out options.

Advertising on Non-Fidelity Websites

Fidelity also advertises our career opportunities on digital offerings not affiliated with Fidelity and we contract with third-party advertising companies, such as Meta, to display these ads. These third-party advertising companies may use cookies and similar technologies to collect technical and web navigational information, such as device type, browser type, Internet protocol address, pages visited, and time stamp.

Fidelity and these third-party online advertising companies may use the data collected, along with other information we have about you and your Fidelity relationships, to serve relevant ads to you and to measure the success of our advertising campaigns. The advertisements may be relevant to your interests, as determined by your activity on Careers Sites. These are known as "interest-based advertisements".

You may opt-out of receiving interest-based advertisements from online advertising companies, including those used by Fidelity, by clicking on the AdChoices icon and following the opt-out instructions.

If you generally want to "opt out" of receiving online interest-based advertisements on your internet browser from advertisers and third parties that participate in a self-regulatory programs like the Digital Advertising Alliance (DAA) program or the Network Advertising Initiative (NAI), please follow the instructions at WebChoices: Digital Advertising Alliance's Consumer Choice Tool for Web US (aboutads.info) and NAI Consumer Opt Out (networkadvertising.org) to place an "opt-out" cookie on your device indicating that you do not want to receive interest-based advertisements. If you want to "opt out" of receiving online interest-based advertisements on mobile devices, please follow the instructions at YourAdChoices.com | AppChoices and [Mobile Opt Out - NAI: Network Advertising Initiative \(thenai.org\)](http://MobileOptOut-NAI:NetworkAdvertisingInitiative(thenai.org)).

Access and Correction

If you choose to register on a Careers Site(s), you may change some of the personal information collected about you and stored on the Careers Site(s) by logging into the Careers Site(s) and choosing to update your account information. The updated profile will be used as the default the next time you apply for a job using your account online. To change personal information that you already provided for consideration for a specific position, please resubmit your application to update personal information about you that is associated with that job application. We encourage you to promptly update your personal information if it changes or is inaccurate. If you do update your personal information through a Careers Site(s), we will be able to see what changes you have made and when you made those changes.

Links to third party websites, online services, and content

The Careers Site(s) may contain links to third party websites and online services (for example, social media platforms) and may include embedded content that is hosted by third parties. This policy does not address the privacy, security, cookie policy and settings, or other practices of the third parties that provide such websites, online services, or content, and we are not responsible for the privacy practices or the content of these other websites, online services, or content providers. If you use a link to another website or online service or view third party content (for example, an embedded video), please consult the privacy policy for that website/or online service for additional information on their privacy practices and advertising opt-out instructions.

Diversity

Fidelity is an equal opportunity employer. Fidelity does not discriminate, either directly or indirectly, on the grounds of sex, sexual orientation, trans-sexuality, race, ethnic origin, religion, belief, disability, marital status, creed, nationality, national origin, color and/or age in any area of recruitment. In some countries we ask for information on the race, gender, and disability and/or veterans status of our applicants for the purpose of monitoring equal opportunity. Fidelity will reasonably accommodate applicants with disabilities who need adjustments to participate in the application or interview process. To initiate a request for an accommodation, please contact the

following:

- For US applicants: Contact the HR Leave of Absence/Accommodation Team by sending an email to accommodations@fmr.com or by calling 800-835-5099, prompt 2, option 2.
- For Ireland applicants: Contact AccommodationsIreland@fmr.com.

To the extent the personal information you provide as part of your CV/resume, job evaluations or educational records contains detail of your: racial or ethnic origin; political opinions or beliefs; religious beliefs; membership in a trade union or political party; physical or mental health or condition; sexual orientation; commission (or alleged commission) of an offence or related proceedings; you expressly authorize Fidelity to handle such details for the purposes of your job application.

Law Applicable to Job Application

The Careers Site(s) allows you to apply for jobs based in other jurisdictions. Jobs posted on the Careers Site(s) will be governed by the laws of the country where the job is located. By applying for a job through the Careers Site(s), you accept that the laws of the country where the job is located shall apply to any employment for which you are retained, but that US law will apply to the information collected through the Careers Site(s) relating to the job application with the exception of Canadian job applications where Canada law will apply.

About Children

The Careers Site(s) is not intended for persons under the age of 18.

Data Collection, Use, Transfer and Disclosure Outside the U.S.

Reasons and Basis for Collection, Use, Transfer, and Disclosure

Personal information provided through the Careers Site or otherwise in connection with your application will be collected, used, transferred and disclosed (“processed”) when:

- (1) required by applicable law;
- (2) necessary to take steps at your request prior to entering into an employment relationship or contract with you;
- (3) necessary to protect the vital interests of any person;
- (4) we have a legitimate interest to do so, including for Fidelity’s global recruitment functions and for related management and planning purposes; or
- (5) otherwise allowed by applicable law.

Transfer, Disclosure and Joint Use of Personal Information

Disclosing your personal information may include transferring personal information to other countries than where you reside, and those countries may have different data protection regimes.

If you are located in the European Economic Area (the “EEA”) or the United Kingdom (“UK”) this may include countries outside of the EEA and UK. Some of these countries are recognized by the European Commission or UK as providing an adequate level of protection (the full list of these countries for the EEA is available [here](#) and the UK Information Commissioner’s opinions are available at Information Commissioner's Opinions on Adequacy | ICO).

As for transfers to other countries, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission and the UK International Data Transfer Agreement or Addendum as appropriate to protect your information. Applicants in the EEA may obtain a copy of these measures by following this link: http://ec.europa.eu/justice/data-protection/international-transfers/transfer/index_en.htm.

International Privacy Rights Requests

Where provided by applicable local law, you may access, modify or object to the use of personal information, or request that your personal information be transferred to you or another organization in a structured, commonly used and machine-readable format. In your request, please make clear what personal information you would like to access or have changed, whether you would like to have personal information that you provided us suppressed from our database or otherwise let us know what limitations you would like to put on our use of your personal information.

For your protection, we may only implement requests with respect to the information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable. Please note that certain personal information may be exempt from such access, correction, or objection rights pursuant to local data protection laws. Please see the “Contact Us” section below for whom to address your request.

As applicable, you may lodge a complaint about the way we process your personal information with a supervisory authority of your country or region.

International Contacts

<p>EEA Countries</p> <p>Contact the local Data Protection Officer/ Privacy Representative, or HR Representative responsible for your country or region.</p> <ul style="list-style-type: none">• FMR UK: FMRLondonPrivacyRepresentatives@fmr.com• Canada: privacy@fidelity.ca• India: Grievance.Officer@fmr.com• SPS Germany: WSSPSHR@fmr.com• FISC Ireland & SAI Ireland: PrvcyOffc@fmr.com <p>For the following businesses, please use the email address listed.</p> <ul style="list-style-type: none">• Pembroke Real Estate: PembrokeHumanResources@fmr.com
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Additional Information for California Residents

This Additional Information for California Residents (this “Supplement”) supplements the above Fidelity Applicant Privacy and Protection Policy and Notice.

This Supplement is provided for purposes related to the California Consumer Privacy Act of 2018, as amended (the “CCPA”) and applies to the personal information of California residents who apply to Fidelity companies that are subject to CCPA. As used in this Supplement, “Personal Information” means information that is considered personal information as set forth in the CCPA and is not otherwise excluded from the scope of the CCPA.

Collection and Disclosure of Personal Information

The following chart details which categories of Personal Information we may collect and process, as well as which categories of Personal Information we disclose to third parties for our operational business and hiring and recruitment purposes, including within the 12 months preceding the date this Policy was last updated.

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes
Identifiers , such as name, alias, postal address, unique personal identifiers, email address, online identifiers, and government-issued identifiers (e.g., Social Security number, driver’s license, passport number)	service providers that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, expense management, IT, and other services; professional advisors such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement
Personal information as defined in the California customer records law , such as name, contact information, signature, passport number; financial, education and employment information, physical characteristics or description	service providers that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, expense management, IT, and other services; professional advisors such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement
Protected Class Information , such as characteristics of protected classifications under California or federal law, such as sex, age, gender, race, disability, citizenship, military/veteran	service providers that provide services such as background checks; public and governmental authorities, such as regulatory authorities and law enforcement

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes
status, gender identity and expression, primary language, and immigration status	
Commercial Information , such as travel information and expenses	service providers that provide services such as travel arrangements and expense management, IT, and other services; public and governmental authorities, such as regulatory authorities and law enforcement
Biometric Information , such as when we collect your fingerprints in order to conduct a background check, or when you use our voice recognition service that we use for identity verification and security purposes subject to applicable law	service providers that provide services such as employment screening and background checks, IT, and other services; public and governmental authorities, such as regulatory authorities and law enforcement
Internet or network activity information , such as access and usage information regarding our website or online application portal, timestamp information, and access and activity logs	service providers that provide services such as IT, and other services; public and governmental authorities, such as regulatory authorities and law enforcement
Audio/Video Data. Audio, electronic, visual and similar information, such as your resume or cover letter or if you participate in a video interview with us	service providers that provide services such as IT, and other services; public and governmental authorities, such as regulatory authorities and law enforcement
Education Information subject to the federal Family Educational Rights and Privacy Act such as student transcripts, grade point average, grades, academic standing and disciplinary records, confirmation of graduation	service providers that provide services such as background checks public and governmental authorities, such as regulatory authorities and law enforcement as required
Employment Information. Professional or employment-related information, such as work history and prior employer, information from reference checks, work experience, qualifications, training and skills, work authorization, CV, résumé, cover letter, professional and other work-related licenses, permits and certifications held, and publicly accessible information posted on your professional social media accounts	service providers that provide services such as recruiting, talent acquisition, employment screening and background checks, consulting, IT, and other services; professional advisors, such as lawyers; public and governmental authorities, such as regulatory authorities and law enforcement
Sensitive Personal Information. <ul style="list-style-type: none"> • Personal Information that reveals an individual's Social Security, driver's license, state identification card, or passport number; 	service providers that provide services such as employment screening and background checks; public and governmental

Categories of Personal Information	Disclosed to Which Categories of Third Parties for Operational Business Purposes
account log-in; racial or ethnic origin, religious or philosophical beliefs, citizenship, immigration status, or union membership; <ul style="list-style-type: none"> • The processing of biometric information for the purpose of uniquely identifying an individual. 	authorities, such as regulatory authorities and law enforcement as required.

In addition, please see the following sections in the main portion of this Notice: (1) the “Information You Provide” section for additional types of personal information we may collect, (2) the “Information from Other Sources” section for other sources from which we may obtain information, and (3) the “Use of Personal Information” section for a description of the business or commercial purposes for which we collect/use personal information.

We may also disclose the above categories of personal information to a third party in the context of any reorganization, financing transaction, merger, sale, joint venture, partnership, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

Selling/Sharing of Personal Information

We DO NOT sell your personal information for payment or for any other compensation. However, some of the ways in which we share your personal information with third parties on certain of our Websites may, under the CCPA, be considered to be a “sale” of personal information or “sharing” of personal information for “cross-context behavioral advertising” (as those terms are used in the CCPA).

We engage third party service providers, including marketing and advertising providers, and social media platforms (providers) to personalize your browsing experience on our Websites, to provide certain targeted advertising services for us, and to help us measure the effectiveness of our Websites and our online advertising. When you visit our Website, we and our providers collect certain information about your activity on our Website, including cookies and similar data stored on or collected from your browser or device. In some cases, our providers may combine this information collected on our Website with information about your activity on other, unaffiliated websites or social media platforms to deliver our ads to you when you are visiting other websites or platforms. This sharing of your information with certain third parties via cookies and similar methods, and our providers' use of certain cookies, may be considered to be a "sale" of personal information or "sharing" of personal information for "cross-context behavioral advertising" under the CCPA.

California residents covered by the CCPA have the right to opt out of this "sale" or "sharing" of personal information. To opt out of this sale or sharing of your personal information, please

click on the "Do Not Sell or Share my Personal Information" link on the footer of the Website and follow the prompts.

Note that Fidelity permits all visitors to our website to automatically exercise their right to opt-out of this sale or sharing of this personal information using the Global Privacy Control (GPC) signal without having to make individualized opt-out requests. If you have enabled the GPC signal in your browser, we will honor your request to opt-out of this sale or sharing of personal information as communicated via the GPC signal. These opt-outs (whether via the toggle above or via the GPC signal) are a setting that is specific to the device or browser you are using. You will need to opt out again if you visit our applicable Websites from a different device or browser, change your browser settings, or clear your cookies.

In the 12 months preceding the date of this Notice, we "sold" and/or "shared" personal information for "cross-context behavioral advertising", with respect to California residents covered by the CCPA. We do not knowingly "sell" or "share" for "cross-context behavioral advertising" personal information of minors under 16 years of age.

Use of Sensitive Personal Information

We may use sensitive personal information for the purposes of performing services for our business, providing services as requested by you, and ensuring the security and integrity of our business, infrastructure, and the individuals with whom we interact. This includes, without limitation, receiving and processing your job application, evaluating your suitability for the position(s) you are applying for, conducting background checks, analyzing demographic information, issuing an offer (subject to our discretion), fulfilling administrative functions, complying with law, legal process, or requests from governmental or regulatory authorities, and exercising or defending legal claims.

Individual Requests

You may, subject to applicable law, make the following requests:

1. You may request that we disclose to you the following information covering the 12 months preceding your request:
 - a. The categories of personal information we collected about you and the categories of sources from which we collected such personal information;
 - b. The business or commercial purpose for collecting personal information about you; and
 - c. The categories of personal information about you that we otherwise disclosed, and the categories of third parties to whom we disclosed such personal information (if applicable).
2. You may request the correction of inaccuracies in your personal information.
3. You may request that we delete your personal information that we have collected from you, subject to exceptions defined in the CCPA.
4. You may request to receive a copy of your personal information, including specific pieces of personal information, including a copy of the personal information you provided to us in a portable format.

We will not unlawfully retaliate against you for making a request under the CCPA. You may make a privacy request through one of the options provided on our [California Privacy Rights Request Page](#). We will verify and respond to your request consistent with applicable law, considering the type and sensitivity of the personal information subject to the request. We may need to request more personal information from you, such as email address and phone number, to verify your identity and protect against fraudulent requests. If you make a request to delete, we may ask you to confirm your request before we delete your personal information.

Authorized Agents

If an agent would like to make a request on your behalf as permitted by applicable law, the agent may use the submission methods noted in the “Individual Requests” section. As part of our verification process, we may request that the agent provide, as applicable, proof concerning their status as an authorized agent. In addition, we may require that you verify your identity as described in the “Individual Requests” section or confirm that you provided the agent permission to submit the request.

Changes to this Notice

We reserve the right to amend this Notice at any time without advance notice to address changes or future developments at Fidelity or the Careers Site(s). When we do, we will communicate changes and updates to this policy by posting the updated policy and Last Updated Date.