

Privacy Notice for Job Applicants

Scope. This Privacy Notice for Job Applicants ("Notice") is provided by First Command Financial Services, Inc. and its affiliates (collectively, "First Command"). This Notice applies to personal information that is collected, generated or maintained about you in connection with applying for employment with First Command. Note that, to the extent and in a manner that is consistent with applicable law, we may supplement the information provided by you with other personal information (a) from third parties we select, such as background check and driving record information providers; (b) from third parties that you instruct or authorize to send information to us; and (c) from publicly available information.

California residents. California residents should also refer to the section below entitled [Additional Information for Job Applicants Who are California Residents.](#)

Generally.

This Notice does not constitute or form part of any contract (for example, an employment contract).

If you use or submit a job application through a third-party posting service or website that is not engaged by us, this Notice will not apply to the practices of such other services or websites. We cannot be responsible for the actions and privacy policies of the third parties that operate such services or websites.

The categories of personal information listed below will be used to evaluate your qualifications for available or anticipated positions at First Command, to assess your suitability for a job at First Command, and for the purposes of complying with applicable laws. We will maintain job applicant records for as long as required under applicable law. In the absence of a specific legal retention requirement, we may retain the information you provide for up to four years and we may use that information to consider your eligibility for any available or anticipated employment positions at First Command during that time, unless you direct otherwise in writing.

Categories of Data Collected, and Associated Purposes. The categories of personal information we may collect and process (but only to the extent and in a manner that is consistent with applicable law) are as follows:

- *Personal identifiers including sensitive identifiers* and demographics.* First Command collects personal identifiers (such as your name, contact information, Social Security number, driver's license number, and passport number) and demographic information (such as your date of birth). Note that sensitive identifiers such as Social Security, passport, and driver's license numbers should only be provided by you when there is a need for those identifiers (for example, to comply with immigration requirements or for the purposes of obtaining driving records or background checks where applicable or required). Please note that if you provide your mobile number to us, we understand that you agree to receiving informational text messages from us (as permitted under applicable law) as pertinent to your application, unless you let us know otherwise.
- *Job preference information.* First Command will receive the information you submit about your job preferences (such as the posting and description of the job to which you apply, your compensation expectations, and your preferred start date).
- *Professional, employment, and education information.* First Command collects professional and employment-related information (such as information in your cover letter and resume/CV and a list of skills) and education information (such as certifications, license, academic transcripts, and confirmations of attendance at an educational institution).

- *Health information.** First Command may receive health-related information from you that is relevant to your application, such as when you provide information about your ability to perform certain job functions, the need for accommodations, or a disability.
- *Protected class information.** First Command may receive protected class information from you as defined by applicable law (such as race, gender, copies of citizenship and right to work information, and veteran status).
- *Comments.* First Command receives any comments and messages you submit along with your job applications.
- *Background check and public records information.* With your permission, First Command may receive information contained in background check reports and in public government records (such as work history, credit history, driving records, criminal records, and court records).
- *Audio and visual information.** First Command may monitor and collect activity and communications made using First Command devices and communications systems (such as our telephone and email systems), and we may monitor and record video footage taken by security cameras. With notice (and, when required, consent), First Command may monitor and record video of online interviews and meetings.
- *Publicly available information.* First Command may review publicly available social media pages and other public Internet postings, to the extent permissible under applicable law.
- *Authentication Data.** First Command collects your signature and related authentication details in connection with any documents you electronically or physically sign and provide to First Command. This information may be used to maintain the integrity of our processes, enforce rights, prevent fraud, and validate your identity.
- *Evaluations.* First Command may collect and maintain information about our review and evaluation of your candidacy for employment, including records associated with any interviews.

**California residents, please note that some information within this category may constitute "sensitive personal information" under the California Consumer Privacy Act.*

In addition, we may automatically collect other categories of personal information when you use a First Command website to submit your application to us. We use this information to provide and improve our website and job application processes, for anti-fraud purposes, and to create aggregate internal reports on website usage and activity, such as views of certain job postings. These additional categories may consist of:

- *Online identifiers.* First Command may collect your IP address and other online identifiers when you use First Command websites.
- *Website activity information.* First Command may monitor and collect First Command website activity information, such as website clicks, content and page views, and the website each visitor visited prior to our website.

Note that application information may be collected by us directly through our website or by email, and/or application information may be collected on our behalf by our contracted third-party administrators.

Data Sharing. We may share any of the categories of personal information listed above for our business purposes as described above and as further described below.

- *Affiliates.* We may share information, including personal information, with our affiliates in the First Command family of businesses, and any successors thereto in the normal course of our business operations, for business purposes such as to communicate with you, to process and evaluate your job application, and as part of other recruiting-related activities.
- *Vendors and service providers.* We may share information, including personal information, with vendors and service providers that process such information to perform services for us in connection with our relevant business operations.
- *Legal and similar disclosures.* We may share personal information with law enforcement, the courts, our advisors, attorneys, and others who participate in the legal process, if we believe doing so is required or appropriate to: comply with legal requirements and law enforcement requests (such as a court order or subpoena); comply with legal process (such as discovery); or protect your, our, or others' rights, property, or safety.
- *Merger, sale, or other asset transfers.* If we are involved in a merger, acquisition, financing due diligence, reorganization, bankruptcy, receivership, sale of company assets, or transition of relevant services to another financial services provider, your personal information may be shared with the other parties and advisors involved under an obligation of confidentiality in connection with the negotiation of such transaction, and your personal information may be transferred as part of such a transaction.

Contact for More Information. If you have any questions concerning this Notice, please contact us at DataPrivacy@firstcommand.com.

Additional information for Job Applicants Who are California Residents

This section set forth additional information pursuant to the California Consumer Privacy Act (as amended from time to time, the "CCPA"). As used in this section, "you" refers to California residents only.

California Privacy Rights Requests. The CCPA includes specific rights for privacy-related requests which are addressed in this Notice below. You may have other rights under California or other applicable law, and the information provided below is not intended to suggest that these are the only rights you may have.

- California residents have the following rights under the CCPA with respect to personal information addressed by this Notice: to request additional information about our data collection, use, disclosure, and sales practices in connection with your personal information; to request the specific personal information collected about you during the previous 12 months; to request the deletion of the personal information we have about you; to request a restriction on certain processing of personal information; and to request correction of inaccurate information. You also have the right to not be discriminated against for exercising your privacy rights.
- Under the CCPA, you may use an authorized agent to make privacy rights requests. We require the authorized agent to provide us with proof of your written permission (for example, a power of attorney) that demonstrates authorization to submit a request for you. An authorized agent must follow the process described below to make a request, and we will also (a) require the authorized agent to verify the agent's own identity and (b) confirm the agent's authority with you.
- To make a request, you may email us at DataPrivacy@firstcommand.com or call us at 800-443-2104. In most cases, you will be required to provide your name and other contact information

so that we can verify your request, and in some cases additional information may be required. Where possible, we will attempt to match the information that you provide in your request to information we already have on file to verify your identity. If we are able to verify your request, we will process it. If we cannot verify your request, we may ask you for additional information to help us do so.

- We will respond to your request within the time period required by applicable law. However, we may not always be able or required to comply with your request, in whole or in part, and we will notify you in that event.
- We do not sell or share your personal information, as those terms are used under the CCPA.

Data Retention. We use the following criteria to determine the length of time for which we retain the personal information concerning you that is addressed by this privacy notice:

- the business purposes for which the personal information is used, and the length of time for which such information is required to achieve those purposes, including for system of record and litigation hold purposes;
- whether we are required to retain the category of personal information in order to: (i) comply with legal or contractual obligations; (ii) assert or defend against potential legal claims or as necessary to investigate theft, fraud, or other activities that are potentially (a) in violation of our policies and procedures applicable to you or (b) a violation of the law; (iii) ensure a secure online environment; and/or (iv) protect health and safety;
- the privacy impact on the individual of ongoing retention; and
- the manner in which the personal information is maintained and flows through our systems and how best to manage the lifecycle of such information in light of the volume and complexity of the systems in our infrastructure and the need to maintain high integrity and availability within our systems.

In addition, we delete personal information if you appropriately invoke the right to delete as to such personal information and no exception applies.

Effective Date: May 2023