

Employment Applicant Privacy Notice

March 2019

Introduction

At U.S. Bancorp we are committed to maintaining the confidentiality and security of your personal information. This Employment Applicant Privacy Notice describes the personal information that U.S. Bancorp collects from or about you, how we use it, and with whom we share that information.

This notice applies to non-public personal information (NPPI) about persons who may become employed by U.S. Bancorp. This notice should not be confused with privacy policies that discuss the collection and use of information about people who are U.S. Bancorp customers or who visit U.S. Bancorp web pages. Those policies can be found at usbank.com/privacy.

Policy of compliance

It is U.S. Bancorp's policy to comply with the applicable provisions of privacy laws in each jurisdiction in which we operate. Privacy laws and a person's right to privacy can vary from one jurisdiction to the next. The rights and obligations described may not be applicable to all persons or in all jurisdictions

Why do we collect NPPI?

Your NPPI is used for business purposes, including your application for employment with U.S. Bancorp. Uses may include:

- Determining eligibility for employment including qualifications, background checks and pre-employment screening
- Assessing qualifications for a particular job
- Complying with applicable labor or employment statutes
- Other purposes as required

What NPPI do we collect?

We collect and keep NPPI about persons who may become employed by U.S. Bancorp, including the NPPI included on resumes and applications. These can include:

- Identifying information, including your name, home address, personal phone number, personal email address and Social Security number
- Information you choose to provide, such as race, national origin, veteran or disability status
- Applications, resumes, references and interview notes
- Letters of offer and acceptance of employment
- Payroll information such as Social Security number or paycheck deposit information
- Wage and benefit information
- Information relating to compliance with labor or employment laws

As a general rule, we collect NPPI directly from you. When the NPPI that we collect about you is provided to us by a third party, if allowed by law, we will obtain your consent before we seek out this information from such sources. We may request your consent directly, or your consent may be implied by your actions.

We may use the services of third parties in our business and may also receive NPPI collected by those third parties as part of their delivery of services to our employees. Where required or permitted by law or regulatory requirements, we may collect information about you without your knowledge or consent.

How do we use your NPPI?

We may use or disclose your NPPI for:

- The purposes described in this Privacy Notice
- Any purpose we notify you about; if your consent is required by law, we will obtain your consent

We may use your NPPI without your knowledge or consent where we are permitted or required to do so by law or regulation.

When do we share your NPPI?

We may share your NPPI with our employees, contractors, consultants and other parties (including other units within U.S. Bancorp) who need the information to assist us with establishing our employment relationship with you. These third parties may provide products or services (including information technology) to us or on our behalf, or collaborate with us in providing products or services to you. NPPI is made accessible in another country only if required or permitted under privacy laws or regulations, and where in our judgment a reasonable level of privacy protection is provided.

Your NPPI may be shared:

- As part of required regulatory compliance and risk management programs
- As permitted or required by applicable law or regulatory requirements; in such a case, we will make reasonable efforts to not disclose more NPPI than is required under the circumstances
- To comply with valid legal processes such as search warrants, subpoenas, or court orders
- To protect the rights and property of U.S. Bancorp
- With your consent when your consent is required by law

Notification and consent

Privacy laws do not generally require us to obtain your consent for the collection, use or disclosure of NPPI to begin your employment relationship.

Where your consent was required for our collection, use or disclosure of your NPPI, you may at any time withdraw your consent (subject to legal or contractual restrictions and reasonable notice).

How is your NPPI protected?

We make reasonable efforts to maintain physical, technical and administrative safeguards that are appropriate to secure your NPPI. These safeguards are designed to protect your NPPI from loss or unauthorized access.

How long is your NPPI retained?

Except as permitted or required by law or regulation, we make reasonable efforts to retain your NPPI only as long as we believe necessary to fulfill the purposes for which the NPPI was collected, and as directed by our record retention policies.

Access to Your NPPI

Where required by law, you can ask us to disclose to you the NPPI we have collected about you.

Your right to access the NPPI that we hold about you is not absolute. There are instances where law or regulations allow or require us to refuse to provide some or all of the NPPI that we hold about you. The NPPI may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

In the event that we cannot provide you with access to your NPPI, we will make reasonable efforts to tell you why, subject to any legal or regulatory restrictions.

Revisions to this Privacy Notice

We may make changes to this notice to reflect changes in our legal or regulatory obligations or in how we manage your NPPI. We will update this Privacy Notice to reflect the changes. Changes will be effective at the time they are communicated, unless they relate to information that you consented to disclose. In that case, the change will be effective when you decide whether to continue to consent to provide that information.

Interpretation of this Privacy Notice

Any interpretation associated with this Privacy Notice will be made by Human Resources, who may consult with the Law Division - Privacy and Data Strategy group.

This Privacy Notice does not create any new legal rights for you or impose upon us any obligations other than those imposed by the privacy laws applicable to a person's NPPI. In case of a conflict between this Privacy Notice and an

existing U.S. Bancorp policy, the other policy controls.

If there is an inconsistency between this Privacy Notice and privacy laws, this Privacy Notice will be interpreted to comply with privacy laws.

Organizations covered by this notice

In this notice, "U.S. Bancorp" means all companies affiliated with U.S. Bancorp, including U.S. Bank, N.A., Elavon, and others.

Glossary

- **We, us:** When you see the words "we" or "us," in this notice, they mean one or all of the U.S. Bancorp companies. U.S. Bancorp is made up of a number of companies with operations both inside and outside of the United States. If you see the phrase "U.S. Bancorp," that means all the companies that are part of U.S. Bancorp.
- **Third party:** The phrase "third party" means an organization that is not part of U.S. Bancorp.
- **Person:** The word "person" means an individual person.
- **NPPI:** The phrase "non-public personal information" (NPPI) is information (or a combination of different pieces of information) that is unique to you and is not available to the general public. A Social Security number or a personal bank account number are examples of NPPI. NPPI does not include anonymous or non-personal information, which is information that cannot be associated with or tracked back to a specific person. NPPI includes, but is not limited to, information retained on paper or electronically.

Questions or concerns?

If you have any questions about this Privacy Notice or concerns about how we manage your NPPI, please contact Human Resources by calling 800.806.7009 and saying "Human resources" after the prompt, or you can email the U.S. Bank Employee Service Center at hrcs@usbank.com.