



# Talent Acquisition Privacy Statement

## The TD Bank Group Commitment to Privacy

Protecting your privacy and the confidentiality and security of your Personal Information is fundamental to the way we do business within TD Bank Group (TD).

## Our Talent Acquisition Privacy Statement

This Statement informs you of the practices we have in place for the collection, use and retention of the personal information we obtain during the job application and recruitment process. It applies to all candidates (internal and external) who apply for a role and anyone who expresses an interest in working for TD, and whose Personal Information is submitted to the relevant Talent Acquisition or Human Resources team for the applicable TD affiliate.

## What Types of Personal Information We Collect and How We Use It

The term "**Personal Information**" means personal, financial and other confidential information and details about you that you provide to us or that we obtain from others within or outside TD. Examples of the categories of Personal Information we may process include:

- Personal details and contact information (e.g., name, address, phone number(s), email address, date of birth, gender, etc.)
- Personal identification numbers (e.g., National ID, visa, or employee ID number, where currently employed by TD, etc.)
- Compensation expectations, application information (e.g., Candidate type (internal or external), status within the recruitment process, assessment test information, etc.)
- Education and employment history, qualifications, and skills
- Results of background checks, and right to work information
- Contact details of advocates/supporters and any references we may take up (including any required in keeping with regulatory requirements)
- Any other Personal Information you may provide in your application or by other means

We may also collect, store and use the following special categories of more **Sensitive Personal Information**, for example, for diversity, inclusion and equality monitoring and reporting, and identifying conflicts of interests. These categories are provided voluntarily and are not required to apply for jobs; however, there might be instances, where local national laws require us to collect this information. In those cases, if you do not provide us with your Personal Information when requested, it may prevent us from being able to process your application.

- Examples of the categories of Sensitive Personal Information which we may process include: Information about your race or national or ethnic origin, religious beliefs, and/or sexual orientation.
- Information that identifies veteran status or having any impairment or disability.
- Information that identifies whether you are a politically exposed person which may infer your political opinions. TD's hiring practices include risk-based policies, procedures and governance overseeing the hiring of employees that are politically exposed persons. This includes a politically exposed person identification process as well as an escalation/ assessment process to



AML Team Advisory Corporate (AML Team Advisory) and Global Sanctions & Anti-Bribery/AntiCorruption Centre of Excellence (CoE). This process applies to all TD Bank employees, in all segments and regions.

As a regulated financial institution, we carry out a criminal records check in order to satisfy ourselves that there is nothing which makes you unsuitable for the role. TD, or a third party acting on TD's behalf, will therefore collect information about your arrest's history during your onboarding process.

TD uses Personal Information that has been voluntarily provided by you, or that has been shared with TD by a third party you have previously agreed can share the Information with TD (such as social media sites or external recruiter). We will use the Personal Information provided only for the legitimate and necessary business purposes of TD, including for the purpose of assessing suitability in the recruitment, selection and job hiring process, to review and better understand TD's hiring processes and to monitor equal opportunities, and if you are successful, to determine the terms on which you will work for TD. In order to achieve these purposes, we may conduct analytics on your Personal Information. Should you be successful, TD will also retain certain Personal Information for the ongoing administration of your employment relationship. TD may use the Personal Information provided to contact you at any time during your candidacy for employment, to request other Information, or, if you choose, to send you job-related information in the future.

Access to the Personal Information that you submit is limited to individuals who have a business need, such as TD employees, agents, and third-party service providers. We may be required by law to share your Personal Information with any regulatory or other governmental organisation, in any jurisdiction in which we operate due to the nature of our specific business in that regulator's jurisdiction.

TD may also add Information about you to its candidate database to manage the relationship between you and TD, and for the purposes of considering whether your profile is suitable for other job vacancies at TD. TD may also use publicly available sources such as LinkedIn or similar sites with professional purposes to source suitable individuals.

To verify whether you have the skills and experience, and to comply with local law, TD will undertake a variety of assessments and background checking processes. These may include on-line (some of which may be by automated means) or face to face selection assessments. If you are successful, in accordance with local law background checks may include, but are not limited to, credit reference and criminal record checks, address verification, right to work entitlement for the jurisdiction that you have applied for, academic qualifications and employment references. Please note that assessments and verifications may vary from one country to another.

### **Purposes of Processing Your Personal Information**

<b>Purpose</b>	<b>Legal Ground</b>
For recruitment, selection including assessing whether you have the necessary skills to perform the job, and for background and reference checks related to the hiring purposes.	In our relationship with you and/or for the purposes of entering into an employment contract with us.



For successful candidates, onboarding and employee management activities. If your application is successful, we will use the personal information you have provided to administer your employment with us, and we will provide you with an employee privacy notice, which explains how we process personal information in the context of your employment with TD.	In our relationship with you and/or for the purposes of entering into an employment contract with us.
For monitoring equal opportunities	Consent - in order to protect candidates from discrimination.  Legal Grounds – In order to adhere to local diversity, inclusion and equality laws
For managing conflicts of interest	Legal Grounds – In order to adhere to local conflicts of interest laws
For the purposes of maintaining business continuity, for undertaking internal investigations and audits, or for our business operations in general.	Legitimate Interest - in order to protect TD's business and operations.
For future TD Bank relevant job opportunities	Consent

### **Sharing, Protection and Accuracy of Your Personal Information**

If applicable, your Personal Information may be shared, stored or accessed in Canada or other jurisdictions or countries where TD has affiliates and subsidiaries or third party providers are located as it relates to the recruitment process. TD will do this in accordance with the applicable privacy laws and regulations. By providing your Personal Information, you are acknowledging that this transfer, storing or processing may take place. If you are applying from a jurisdiction in the European Economic Area or the United Kingdom, we will take steps to put in place appropriate safeguards to protect your privacy rights, as outlined in this Statement. You can request from the Data Protection Officer (DPO) more information about any such safeguards taken by TD.

TD and its third parties take steps to safeguard the security of your Personal Information and process your Personal Information to a standard commensurate with the appropriate privacy requirements in the jurisdictions within which TD operates.

If you are applying for a role in the USA please also read our [Equal Employment Opportunity Policy Statement](#). California residents: please review our [California Privacy](#) policy.

It is important that the Personal Information TD holds about you is accurate and current. Please keep us informed if your Personal Information changes during your recruitment relationship with TD, by contacting us as per below. For your protection, you should not send Personal Information to us over the internet (including via email) or through any unsecured channel.



TD has put in place procedures to manage any known or suspected data security breach and will notify you, and any applicable regulator, where it is legally required to do so. If you are aware of, or are the victim of, a suspected privacy breach in connection to your candidacy with TD, you should immediately contact us as per below.

### **Use of Third-Party Services**

TD may in some cases engage third parties to complete all or part of the recruitment process for an individual or group of hires (e.g., an outside recruitment agency, etc.).

Third parties are required by contract to comply with TD privacy, confidentiality and security standards in order to protect your Personal Information. The third party has agreed to only use your Personal Information for the purposes described above and below.

Types of TD third-party service provider include but not limited to:

- Applicant tracking and recruitment services and agencies for the collection and processing of candidate Personal Information
- Careers site services, which provide information about TD as an employer
- Online assessments of candidates
- Background, screening and credit reference checks, of candidates during the onboarding process.

### **Retention**

In order to respect your privacy and to protect your Personal Information, TD will only collect, use, process and retain the Personal Information it needs for the purposes described. The Personal Information will be protected by safeguards appropriate to the sensitivity of the Personal Information. It will be retained as long as it is necessary for the fulfillment of these purposes and is subject to the retention requirements of TD and applicable jurisdictional law.

### **Automated Decision Making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you. We do not foresee that any decisions will be made about you using automated means, however we will notify you in writing if this position changes.

### **Our Use of Cookies or Other Similar Technologies**

A cookie is a small amount of data that is stored by your web browser when you visit certain websites. Cookies may be used to track the activities of your browser as well as provide you with a consistent, more efficient experience.

Please refer to the TD Online [Privacy Code](#) for more information about TD's use of cookies, how we handle the Personal Information we collect when you use our websites, what we may use cookies for and steps for managing your cookies.

### **Your Rights in Connection with Personal Information**

Depending on the jurisdiction, and subject to certain exceptions, you may have specific rights regarding your Personal Information, such as:



- Request access to your Personal Information. This enables you to receive a set of the Personal Information we hold about you and to check that we are lawfully processing that Information. Please note that there are a number of legal reasons that entitle us to withhold your Personal Information from you, including but not limited to: references to other individuals; legal privilege; confidentiality; and in connection with legal disputes.
- Request correction of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your Personal Information. This enables you to ask us to delete or remove Personal Information where there is no longer a purpose for us continuing to process it. You also have the right to ask us to delete or remove your Personal Information where you have exercised your right to object to processing (see below).
- Object to processing of your Personal Information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which may lead to you objecting to processing on this ground. You also have the right to object where we are processing your Personal Information for direct marketing purposes.
- Request the restriction of processing of your Personal Information in specific circumstances. This enables you to ask us to suspend the processing of Personal Information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your Personal Information to another party.

If we are relying on your consent to use or share your Personal Information, you have the right to fully or partially withdraw your consent, subject to certain exceptions defined in applicable laws and regulations. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

You will not have to pay a fee to access your Personal Information or to exercise any of the other rights, however, we may charge a reasonable fee if your request for access is clearly unfounded or excessive, in particular in relation to repetitive requests. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity so as to facilitate your right to access the Information or to exercise any of your other rights. This is another appropriate security measure to protect your Personal Information and to avoid the unintended disclosure of your Personal Information to any person who has no right to receive it.

### **How to Contact Us**

If you have any questions or concerns about this Talent Acquisition Privacy Statement, or if you wish to correct the Personal Information gathered for the talent acquisition purposes described above, or to exercise your rights as an individual under applicable privacy laws please contact us at [HiringSupport@td.com](mailto:HiringSupport@td.com).

If you are a data subject located in the UK or EEA, and have any questions, comments, complaints or suggestions in relation to data protection or this Statement, or any other concerns about the way in which we process information about you, please contact:



Data Protection Officer  
60 Threadneedle Street, London  
EC2R 8AP  
[Privacy.EAP@tdsecurities.com](mailto:Privacy.EAP@tdsecurities.com)

You also have the right under applicable privacy laws to make a complaint directly to the regulator at any time if you feel the processing of your Personal Information, as directly related to your application and recruitment with TD, infringes the applicable privacy law. If you wish to make a complaint directly to the regulator, please contact us at [HiringSupport@td.com](mailto:HiringSupport@td.com) to obtain details of the relevant regulator for your specific circumstances.

### **Changes to this Talent Acquisition Privacy Statement**

We reserve the right to update this Statement at any time. We will post the revised version on our Privacy Statement webpage and use other methods, as appropriate, to notify you either directly or indirectly. We may also notify you in other ways about the processing of your Personal Information.

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