Last Updated: March 2025

Neo Financial Technologies Inc., Neo Mortgage Services Inc. and their subsidiaries and affiliates (collectively "Neo", "us" and "we") value your privacy. We are committed to safeguarding your personal information. This Neo Candidate Privacy Policy describes what information we collect about you during the application or recruitment process for employment with Neo, as well as the purposes for which we collect and use that information.

### **Neo Candidates Privacy Notice**

For the purposes of this policy:

"Candidate" includes applicants and candidates who are part of the Neo application or recruitment process; and

"Candidate Personal Information" refers to any information we collect about one of our Candidates during the application or recruitment process which could, alone or together with other information, personally identify them or otherwise be reasonably linked or connected with them.

This policy does not apply to the products and services offered or provided to customers by Neo, those are covered under our <a href="External Privacy Policy">External Privacy Policy</a>.

#### What Candidate Personal Information do we collect?

The Candidate Personal Information we collect, use, and maintain (or "process") can include the following, but is not limited to:

• Identification and contact information, including your name, email address, phone number, location, and any other information you provide (such as referrals and references).



- National identifiers, such as your citizenship status, residency and work permit status.
- Employment and education history, such as your resume or CV, cover letter, website/portfolio, details of how you heard about the position you are applying for, information about any previous employment, or other information you provide to us in support of an application and/or the application and recruitment process.
- Professional or employment information, including your desired salary or terms
  related to benefits, willingness to relocate, other job preferences, interview details,
  reference information and/or information received from background checks (where
  applicable), and information from publicly available resources (such as your LinkedIn
  profile or website).
- As part of the interview process, voice and video recordings may be collected.
- Sensitive or demographic information, such as your gender, medical or health information, veteran status, or your racial or ethnic origin.
- We may also collect information from publicly available sources, such as professional networking sites, publications, and other online profiles, to identify and contact potential candidates.

#### How do we use the Candidate Personal Information we collect?

We use the Candidate Personal Information for the following purposes:

- To assess your skills, qualifications and interests for employment opportunities with Neo. When we process your personal information we may use automated decision making systems to help evaluate your application;
- To verify the information provided by you or others, including checking your references;
- To communicate with you about your application and the recruitment process, including informing you of other potential employment opportunities at Neo;
- If you were referred, to inform the referrer of the status of your application;
- If you are offered a position, to prepare your offer letter and conduct a background check (to the extent permitted by applicable law);
- If you are offered a position and where requested by you, to assist you with obtaining an immigration visa or work permit;
- To comply with local laws, regulations, legal processes or enforceable government requests;
- To prepare and submit reports as required under local laws and regulations; and



• To manage and improve our application and recruitment process (such as making the application process more efficient and improving our diversity practices).

### How do we share your Candidate Personal Information?

Neo will only share your Candidate Personal Information with those who have a legitimate business need for it. Whenever we permit a third party to access your Candidate Personal Information, we will make sure the information is used in a manner consistent with this policy. Your Candidate Personal Information may be shared with third parties (such as service providers or vendors) for the following purposes:

- In order to carry out the uses of Candidate Personal Information described above;
- To enable third parties to provide products or services to us or on our behalf (such as to facilitate the application process or conduct background checks).
- To comply with our legal obligations, regulations or contracts, or to respond to a court order, administrative or judicial process (such as subpoena, government audit or search warrant) or, in response to lawful requests by public authorities (such as national security or law enforcement);
- As necessary to establish, exercise, or defend against potential or pending litigation;
- Where necessary to protect Neo, your vital interests (such as safety and security), or those of another person; or
- With your consent (such as to contact your references). It is your responsibility to obtain consent from references before providing their personal information to Neo.

### **Your Rights**

In accordance with applicable privacy laws (such as PIPEDA and relevant provincial privacy laws), Candidates may have certain rights. This includes the rights to request access or correct your information, request that your information be deleted, or object to or restrict Neo from using it for certain purposes.

You can make a request to do so by contacting our Privacy Officer at privacy@neofinancial.com. We will respond to all requests in accordance with applicable privacy laws.

#### How long do we retain your Candidate Personal Information?

Candidate Personal Information will be stored for three (3) years after your application to comply with our legal obligations. After that time, we will delete all of your personal information. If you are hired for a position at Neo, we will retain the information provided during the application and recruitment process as part of your employee record. Afterwards, the Internal Privacy Policy becomes applicable to the processing of your personal information, and would be provided to you prior to or during onboarding for consent and attestation.

#### Safeguarding your Candidate Personal Information

We use industry standard security practices and procedures to safeguard your personal information. We restrict access to your personal information to those individuals and parties on a need-to-know basis and we regularly train our employees on best information security and privacy practices. We use technical, administrative and physical security measures not limited to the following - passwords, encryption, multi-factor authentication, security monitoring software, and secure cloud storage and restricted access to our offices.

When we transfer personal information to third parties for processing, we ensure that they safeguard personal information in a way that is consistent with our privacy principles, procedures, and practices. Third parties are given only the information necessary to perform the services set out in the contract.

When we process your personal information, we may use automated decision-making systems to help us provide recruitment services to you. For example, we may use these systems to verify your identity, support candidate screening, assess qualifications, detect potential fraudulent activity, and for security purposes. You may contact us using the information in the 'Contact Us' section to request details about our use of these systems, including to challenge a decision made solely by automated means.

Your Candidate Personal Information could possibly be transferred, processed, and stored in countries outside of Canada, primarily the United States. While your information is in another jurisdiction, it will be subject to the laws of that country, which may include lawful access requests by governments, courts, or law enforcement.



#### Update to this Policy

We may make changes to this Candidate Privacy Policy from time to time. Any changes will become effective when the updated policy is published. Your decision to proceed with your application for a position at Neo following any changes to the Candidate Privacy Policy indicates your acceptance of the revised Privacy Policy.

#### **Contact Us**

Our Privacy Officer is responsible for advising Neo about our personal information and data protection obligations, as well as monitoring compliance. Please contact our Privacy Officer if you have any questions, concerns, or complaints about how we handle your personal information or about this Candidate Privacy Policy. Our Privacy Officer can be contacted at the following address:

Attention: Privacy Officer
Neo Financial Technologies Inc.
400 - 200 8 Ave SW
Calgary AB, T2P 1B5
privacy@neofinancial.com