

Fidelity Applicant Privacy and Protection Notice

Last Updated: December 2019

FMR LLC and its affiliated entities (“we,” “us” or “Fidelity”) value your trust and are committed to the responsible management, use and protection of your personal information. This Applicant Privacy and Protection 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) through the use of 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.

These sites are operated by FMR LLC (245 Summer Street Boston, MA 02210 USA) and for India, Fidelity Business Services India Private Limited (Pinehurst, Embassy Golf Links Business Park, Off Intermediate Ring Road, Bangalore – 560 071, India) in order to support Fidelity’s global recruitment functions.

Your Consent

Please read this Notice carefully. By clicking the “I Accept” button on the Careers Site(s) or otherwise applying for employment with Fidelity, where required by applicable law, you indicate your acceptance of our collection, saving, use, transfer and disclosure of personal information as described in this Notice and your election to receive an automated acknowledgement of your application. **If you do not accept the terms you will not be allowed access to apply for a position online or have your written, offline submission considered for a position.**

By using the Careers Sites(s) or otherwise applying for employment with us, you also agree to the transfer of personal information about you to countries outside the country in which you reside which may include countries with a different data protection regime. Fidelity will take appropriate technical, organizational, and legal steps to secure personal information about you.

Information You Provide

This Notice covers any personal information you provide to apply 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, the following information may be collected:

- name, contact information;
- log-in and password;
- CV, resume, cover letter, previous work experience and education information;
- employment preferences, willingness to relocate, current salary, 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.

You may also voluntarily choose to provide other relevant information as part of your application. We would prefer you avoid providing the following sensitive 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, religion, ethnicity, nationality or national origin, age, gender identity, sex life or practices or sexual orientation, marital status, medical or health information (including disability status), genetic or biometric information, political or philosophical beliefs, political party or trade union membership, background check information, judicial data (such as criminal records or information on other judicial or administrative proceedings), and military veteran status. To the extent the personal information you provide as part of your CV/resume, your job evaluations or educational records contains detail of the information referenced in the preceding list, you expressly authorize Fidelity to handle such details 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 personal information to us.

You are responsible for the content of the information you provide to us and you must ensure it is legal, truthful, accurate and not misleading in any way and 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.

Use of Personal Information

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 contract with you; (3) necessary to protect the vital interests of any person; or (4) we have a legitimate interest to do so, including for Fidelity’s global recruitment functions and for related management and planning purposes. We have a legitimate interest in collecting and processing personal information in order to:

- process your application;
- maintaining your information on file for future employment opportunities with us;
- 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 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 interests, for example, in connection with any disputes; and
- perform other administrative and business activities, such as aggregate management reporting, internal training, assess and improve our recruiting and hiring practices, and as generally required to conduct our business.

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.

Personal information about you may be added to Fidelity’s international candidate database and may be used for the purposes of considering whether your profile is suitable for other job vacancies at Fidelity. If we elect to make you an offer of employment, personal information you provide or Fidelity obtains from other sources, as described above, may be incorporated into our human resources

system and used to manage the new-hire process. If you become an employee, any personal information you provide or Fidelity obtains from other sources, as described above, may become part of your employee file and may be used for other employment/work-related purposes.

The provision of personal information 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). Those third parties will be required to use appropriate measures to protect the confidentiality and security of personal information.

Fidelity also may 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 Service; or (7) comply with the law or 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).

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") this may include countries outside of the EEA. Some of these countries are recognized by the European Commission as providing an adequate level of protection according to EEA standards (the full list of these countries is available [here](#)). As for transfers to other countries, we have put in place adequate measures, such as standard contractual

clauses adopted by the European Commission 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.

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 prior to you completing the form. This information will be viewable only by those members of Human Resources tasked with monitoring 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 for the purpose of considering whether your skills are suitable for other opportunities. If you do not wish us to retain your information in connection with consideration for other opportunities, please contact us at EmployeeDataPrivacy@fmr.com. If there is no activity in relation to the personal information, Fidelity may remove it from our database, 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. Note that Fidelity may delete personal information about you at any time (including your CV/resume), without any reason. Therefore, please retain your own copy of the personal information provided to us.

Digital Privacy

Privacy, security, and service in Fidelity's online operations are critical to our business. We use firewall barriers, encryption techniques, and authentication procedures, among other controls, to maintain the security of your online session when you interact with our Careers Site(s).

When you interact with our Careers Site(s), Fidelity manages personal information in accordance with the practices and safeguards described in this policy. Unfortunately, no method of transmitting or storing data can be guaranteed to be 100% secure. Do not send sensitive information via email. It is your sole responsibility to use the appropriate level of care whenever communicating with us.

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 and navigational 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 may use cookies and similar technologies to support the operation of Fidelity websites. Cookies are small amounts of data that a website exchanges with a web browser or application on a visitor's computer or mobile device. Cookies help us to collect information about visitors to Fidelity 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.

You can refuse or delete cookies. Most browsers and mobile devices offer their own settings to manage cookies. If you refuse a cookie when on a Fidelity website, or if you delete cookies, you may experience some inconvenience in your use of Fidelity websites. 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.

Fidelity also uses tools, such as Google Analytics, to help us analyze how you and other visitors use our website and to improve its functionality. Fidelity does not provide any personal information about you to Google Analytics and any information collected by Google is done anonymously without identifying an individual user. We do not associate information collected by Google Analytics with information you may have provided to us. For more information on Google Analytics, including how to opt-out, click [here](#).

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.

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 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.

Links to other websites

The Careers Site(s) may contain links to other websites. The operators of those other websites may collect information about you, through cookies or other technologies. If you access a link to another website, you will leave the Careers Site(s) and this Notice will not apply to your use of and activity on those other websites.

If you provide personal information through any other site your transaction will occur on that website (not the Fidelity Careers Site(s)) and the personal information you provide will be collected by and controlled by the privacy policy of that website operator. Links on the Careers Site(s) to other websites are provided only as a convenience and the inclusion of such links does not imply endorsement of the linked website. We encourage you to read the legal notices posted on those websites, including their privacy policies. We have no responsibility or liability for your visitation to, and the data collection and use practices of, other websites.

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 ethnic origin, gender and disability of our applicants for the purpose of monitoring equal opportunity. If you have a disability and would like to indicate as part of your application any relevant effects of your disability and any adjustment which you consider should reasonably be made to the process to assist your application, please do so in the relevant field during the application process.

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

This 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.

Changes to the Notice

We reserve the right to amend this Notice at any time without advance notice in order to address future developments at Fidelity, the Careers Site(s) or changes in industry or legal trends. We will post the revised Notice on the Careers Site(s) or may announce the change on the home page of the Careers Site(s). You can determine when the Notice was revised by referring to the "Last Updated" date on the first page of this Notice. Any changes will become effective upon the posting of the revised Notice on the Careers Site(s). By continuing to use the Careers Site(s), or submission of applicant information in writing, following such changes, you will be deemed to have agreed to such

changes. If you do not agree with the terms of this Notice, in whole or part, you can choose to not continue to use the Careers Site(s).

Contact Us

U.S. and General Questions	EEA Countries	India
<p>Contact us at: EmployeeDataPrivacy@fmr.com</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"> • Pembroke Real Estate: PembrokeHumanResources@fmr.com • Stock Plan Services: WSSPSHR@fmr.com • Asset Management: FMRLondonPrivacyRepresentatives@fmr.com 	<p>In order to address any discrepancies and/or grievances that you may have in relation to this Notice, there is a designated, "Data Privacy Grievance Officer". The Data Privacy Grievance Officer for Fidelity Business Services India Private Limited is:</p> <p>Name: Anand Misra E-mail: Grievance.Officer@fmr.com</p>

Additional Information for California Residents

This Additional Information for California Residents (this “Supplement”) supplements the above Fidelity Applicant Privacy and Protection Notice available at <https://jobs.fidelity.com/> (our “Applicant Privacy 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 and Fidelity companies which 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.

Categories of personal information we may collect about you

In general, if you are a job applicant or you otherwise interact with us in a pre-employment context, we collect various types of personal information about you. The amount and types of personal information we collect will vary depending on the nature of your relationship and your interactions with us. The categories of personal information that we may collect about you are:

- Personal identifiers, such as your name, address, email address, and other unique identifiers;
- Information covered by California’s records destruction law (California Civil Code §1798.80), such as your signature and telephone number;
- Characteristics of protected classifications under California or US federal law;
- 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;
- Internet and other electronic network activity information, such as information regarding your interactions with our websites and applications;
- Audio, electronic, visual and similar data, such as your resume or cover letter or if you participate in a video interview with us;
- Professional and employment-related information such as your previous work experience;
- Education Information; and
- Inferences drawn from any of the information listed above to create a profile about you, such as a profile that reflects your preferences and characteristics.

In addition, please see the “Information You Provide” and “Information from Other Sources” sections of the Applicant Notice for additional types of personal information we may collect.

Why we collect personal information

Please see the section titled “Use of Personal Information” above for a description of the business or commercial purposes for which we collect/use personal information.