

## **Fifth Third Bank's California Consumer Privacy Act Notice and Notice at Collection for Applicants and Employees**

**Last Updated:** 9/1/2026

This Applicant and Employee Privacy Notice ("Notice") is provided by Fifth Third Bank and its subsidiaries including Provide, Franklin Street Advisors, Inc. ("FSA") and Franklin Street Trust Company ("FST") ("Bank" "us" "we" "our"). It describes how the Bank collects and processes personal information about our applicants and employees. The purpose of this Notice is to provide you with a comprehensive description of our online and offline practices regarding our collection, use, sale, sharing and retention of personal information. You may have certain rights with respect to your personal information and this Notice describes your rights and how you can exercise those rights.

This Notice applies to our current and former applicants and employees and covers our collection and use of your personal information in an employment context. This Notice does not apply to our collection and use of personal information in a consumer or business-to-business capacity.

### **NOTICE AT COLLECTION**

Please review this Notice at Collection before or at the time that you provide your Personal Information ("PI"). The following table identifies which categories of PI we may have collected from our employees and applicants within the last 12 months.

| <b>Categories of PI Collected</b>                                                                               | <b>Examples</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-----------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Identifiers                                                                                                     | A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers, and similar information for your dependents and beneficiaries.                                                                                                                                                                                                                                                                           |
| Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) | A name, signature, Social Security number, physical characteristics or description, photograph, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, membership in professional organizations, professional licenses and certifications, bank account number, credit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories. |
| Protected classification characteristics under California or federal law                                        | Age (40 years or older), race, color, national origin, citizenship, marital status, medical condition, physical, intellectual, or mental disability, sex (including gender, pregnancy or childbirth and related medical conditions), reproductive health decision-making, veteran or military status, genetic information (including familial genetic information).                                                                                                                                                                                                                 |

| <b>Categories of PI Collected</b>                | <b>Examples</b>                                                                                                                                                                                                                                                                                                                   |
|--------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Commercial information                           | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.                                                                                                                                                                                  |
| Biometric information                            | Physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, and voiceprints, keystroke patterns.                                                                                                             |
| Internet or other similar network activity       | All activity on our information systems and communications systems, including browsing history, search history, intranet activity, email communications, social media postings, stored documents and emails, usernames, passwords, calls, call logs, voicemails, texts, chat logs, app use and mobile browsing.                   |
| Geolocation data                                 | Physical location or movements, such as the time and physical location related to use of an internet website, application, or device.                                                                                                                                                                                             |
| Sensory data                                     | Audio, electronic, visual, or similar information and call monitoring and video surveillance.                                                                                                                                                                                                                                     |
| Professional or employment-related information   | Current or past job history or performance evaluations, such as employment application information, background check, drug testing results, work authorization, performance and disciplinary records, compensation data, benefit plan information, leave information and health data concerning employees and family members.     |
| Non-public education information                 | Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, schedules, student identification codes, financial information, or disciplinary records.                                                                        |
| Inferences drawn from other personal information | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.                                                                                                                                                                   |
| Sensitive Personal Information (SPI)             | Social Security, driver's license, state identification card, passport number; account credentials; precise geolocation; racial or ethnic origin; citizenship or immigration status; religious or philosophical beliefs; union membership; certain communications; biometric information; health; sex life or sexual orientation. |

We collect and use information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular employee, applicant, or household ("Personal Information"). Personal information does not include:

- Publicly available information, including from government records, through widely distributed media, or that the employee or applicant made publicly available without restricting it to a specific audience.
- Lawfully obtained, truthful information that is a matter of public concern.
- De-identified or aggregated employee or applicant information.

### **Sources of Personal Information**

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you, such as from the forms or information you input into our career website or application systems, throughout the application process
- Indirectly from you, such as from your interactions with our website or computer systems
- From our service providers, such as
  - Benefit providers
  - Payroll providers
  - Background check providers
  - Fraud monitoring services
- Government entities, such as for background check purposes and/or licensing purposes
- From other employees, such as from performance reviews or other observations and interactions
- Licensing organizations, as applicable
- Social networks (e.g., LinkedIn)

### **Purposes for Collection and Use of PI and SPI**

SPI is used only as necessary to perform services, comply with legal obligations, or ensure security, not for unrelated profiling

We may use or disclose the personal information we collect for one or more of the following business purposes for PI and SPI.

| <b><u>Collection Purpose</u></b>                                                                                                                                                                                                                                                             | <b><u>PI</u></b> | <b><u>SPI</u></b> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|-------------------|
| To recruit and evaluate you as a job applicant and a candidate for employment                                                                                                                                                                                                                | Yes              | Yes               |
| Conduct background checks and verify employment eligibility                                                                                                                                                                                                                                  | Yes              | Yes               |
| Manage your employment relationship with us, including onboarding, timekeeping, payroll, benefits, leave, training, HR data maintenance, emergency contacts, workers' compensation, productivity, performance, discipline, termination, personnel records, employment matters and retention. | Yes              | Yes               |
| Manage and monitor employee access to and prevent unauthorized access to or use of our property, including its facilities, equipment and systems                                                                                                                                             | Yes              | Yes               |
| Design, implement, and promote our inclusion programs                                                                                                                                                                                                                                        | Yes              | No                |
| Ensuring compliance with our information systems policies and procedures                                                                                                                                                                                                                     | Yes              | No                |
| Conduct workplace investigations                                                                                                                                                                                                                                                             | Yes              | Yes               |
| Engage in corporate transactions requiring review of employee records, such as for evaluating potential Company mergers and acquisitions                                                                                                                                                     | Yes              | Yes               |
| Perform workforce analytics, data analytics and benchmarking                                                                                                                                                                                                                                 | Yes              | Yes               |
| As necessary or appropriate to protect the legal rights, property or safety of us, our clients or others                                                                                                                                                                                     | Yes              | Yes               |

|                                                                                                                                                          |     |     |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----|
| To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations                                       | Yes | Yes |
| To detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, and to prosecute those responsible for that activity | Yes | Yes |
| For debugging to identify and repair errors with our services                                                                                            | Yes | No  |
| To improve our websites, present its contents to you, and for short-term, transient use, such as contextual customization of ads                         | Yes | No  |
| For auditing relating to interactions, transactions and other compliance activities                                                                      | Yes | No  |
| To comply with applicable laws, rules and regulations                                                                                                    | Yes | Yes |

We do not use or disclose sensitive personal information for purposes other than for permitted purposes. As a result, we do not offer a right to limit our use or disclosure of these categories of sensitive personal information.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

We may collect, process, and disclose aggregated or deidentified information about our employees and applicants for any purpose, without restriction.

### **Disclosing Personal Information**

We may disclose your personal information we collect to others for the business purposes described in “How We Use Personal Information” section and the table below. When we disclose personal information for a business purpose (except as may be required or permitted by law), we enter into a contract that describes the purpose, requires the recipient keep the personal information confidential, and prohibit using the information for any purpose except performing the contract.

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates
- Service providers
- Government entities
- Licensing organizations
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with your application or employment purposes

The chart below identifies the categories of entities to whom we have disclosed our applicants’ or employees’ personal information for a business purpose over the past 12 months, along with the personal information categories disclosed and the disclosure’s business purposes.

| <b>Category of Entities</b> | <b>PI Categories Disclosed</b>                                                                                                                                                                                 | <b>Sensitive PI Categories Disclosed</b>                                                                                                                        | <b>Business Purpose Disclosures</b>                     |
|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------|
| Our Affiliates              | Identifiers; California customer-records data; protected classifications; commercial information; biometric information; internet/network activity; geolocation; sensory data; professional/employment-related | Government identifiers; account credentials; precise geolocation; racial or ethnic origin; citizenship or immigration status; certain communications; biometric | As described in How We Use Personal Information section |

| Category of Entities    | PI Categories Disclosed                                                                                                                                                                                                                                                   | Sensitive PI Categories Disclosed                                                                                                                                                                                                | Business Purpose Disclosures                                                                                                                                   |
|-------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                         | information; non-public education information; inferences.                                                                                                                                                                                                                | information; health information; sexual orientation information.                                                                                                                                                                 |                                                                                                                                                                |
| Service Providers       | Identifiers; California customer-records data; protected classifications; commercial information; biometric information; internet/network activity; geolocation; sensory data; professional/employment-related information; non-public education information; inferences. | Government identifiers; account credentials; precise geolocation; racial or ethnic origin; citizenship or immigration status; certain communications; biometric information; health information; sexual orientation information. | As described in How We Use Personal Information section                                                                                                        |
| Government entities     | Identifiers; California customer-records data; protected classifications; biometric information; internet/network activity; geolocation data; professional/employment-related information; non-public education information.                                              | Government identifiers; precise geolocation; racial or ethnic origin; citizenship or immigration status; biometrics.                                                                                                             | Background check and licensing purposes; Ensuring compliance with our information systems policies and procedures; Compliance with laws, rules and regulations |
| Licensing organizations | Identifiers; California customer-records data; protected classifications; geolocation data; professional/employment-related information; non-public education information.                                                                                                | Government identifiers; precise geolocation; racial or ethnic origin; citizenship or immigration status.                                                                                                                         | Background check and licensing purposes; Work opportunity tax credit purposes; Compliance with laws, rules and regulations                                     |

### **Selling and Sharing of Personal Information**

In the preceding twelve (12) month period, we have not sold personal information for monetary consideration. When you visit our website, we may use tracking technologies such as cookies for a variety of purposes, including to understand how visitors interact with our websites, and to provide personalized advertisements. The use of these technologies may constitute a “sale” or “share” of personal information under certain state privacy laws.

We do not knowingly sell or share personal information of employees or applicants under 16 years of age.

## **YOUR RIGHTS**

If you are a California applicant or employee, you have the following rights under the California Consumer Privacy Act (CCPA) regarding your personal information.

### **Right to Know and Data Portability**

You have the right to request that we disclose certain information to you about our collection and use of your personal information (“right to know”), including specific pieces of personal information we have collected about you (“data portability”). Once we have received your request and confirmed your identity, we will disclose to you:

- the categories of personal information we collected about you
- the categories of sources from which collected your personal information
- the business or commercial purpose for collecting your personal information and, if applicable, selling or sharing with third parties for cross context behavioral advertising (e.g., targeted advertising)
- the categories of third parties to whom we disclose personal information
- when specifically requested, a copy of your personal information subject to any permitted redactions.

### **Right to Request Correction of Inaccurate Personal Information**

You have the right to request correction of inaccurate personal information maintained by us. We may request documentation from you to determine the accuracy of the information.

### **Right to Request Deletion of Your Personal Information**

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions and limitations.

### **Right to Opt-Out of Sell or Share**

You have the right to opt out of having your personal information sold or shared for specific purposes related to CCPA. In the event of a merger, acquisition, or similar event, we will preserve your opt-out preferences regarding the sale or sharing of personal information.

### **Right to Non-Discrimination for the Exercise of a Privacy Right**

We will not discriminate against you for exercising any of your privacy rights.

### **How to Exercise Your Rights**

To exercise the right to know, data portability, correct, or delete please submit a verifiable request to us by either:

- Calling us toll free at 1-800-889-5269; or
- Visit our online [CCPA Consumer Request Form](#)

You or your authorized agent may only submit a request to know or for data portability twice within a 12-month period. Any disclosures we provide will only cover the 12-month period preceding receipt of your request, but you may request an expanded time period as permitted by law. We will honor that expanded request unless doing so would involve a disproportionate effort.

### **Opt-Out Rights**

Our use of tracking technologies may be considered a sale or share for targeted advertising under applicable state law. To opt out of the sale or sharing of your personal information you may submit a request to us through our online [CCPA Consumer Request Form](#) and selecting Opt-Out Request or by calling us toll free at 1-800-889-5269.

You may also opt out by activating a user-enabled global privacy control, such as a browser plug-in or privacy setting, device setting, or other mechanism, that communicates or signals your choice to opt-out of the sale and sharing of personal information. This option does not stop all sales or sharing of your information because we cannot match your device's identification or internet protocol address with your personally identifiable information like your name, phone number, email address or ZIP Code. If you delete cookies on your browser, any prior do not sell or do not share signal is also deleted and you should make sure that your user-enabled setting is always activated.

You do not need to tell us to limit processing of Sensitive Personal Information because we already limit such processing.

### **Verification Process and Authorized Agents**

Only you, a person registered with the California Secretary of State that you authorize to act on your behalf, may make a request to know, delete or correct your personal information. You may also make a verifiable request on behalf of your minor child.

We cannot respond to your request to know, delete or correct if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable request does not require you to create an account with us. We will only use personal information provided in a verifiable request to verify the requestor's identity or authority to make the request.

### **Responding to Your Requests**

We will acknowledge receipt of your request to know, correct, or delete within 10 business days and will endeavor to respond to a verifiable request within 45 days of its receipt. If we require more time (up to a total of 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable. Applicable law may allow or require us to refuse to provide you with access to some or all of the personal information that we hold about you, or we may have destroyed, deleted, or made your personal information anonymous in compliance with our record retention policies and obligations. We do not charge a fee to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

For requests that we not sell or share your information we will comply with your request as soon as feasibly possible. Once we receive your request, we will wait at least 12 months before asking you to reauthorize personal information sales or sharing.

### **Changes to Our Privacy Notice**

We reserve the right to amend this Notice at our discretion and at any time. Any changes made to this Notice will be available on our website. We encourage you to check our website to review the current Notice in effect.

### **Security**

We safeguard any information our employees or applicants share with us according to strict standards of security and confidentiality.

### **How Long We Keep Your Information**

We retain each category of PI listed above only as long as we are required to do so under applicable law, legal obligation or business requirement. We adhere to records retention, data governance, and business process requirements to understand if there is a legitimate need to retain the information.

### **Contact for More Information**

If you have any questions or comments about this Notice, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please call 1-800-889-5269.