



## FIDELITY APPLICANT PRIVACY AND PROTECTION NOTICE

Last Updated: December 2017

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. **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 than in place in the country in which you reside. 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 submit to apply or search for a position at Fidelity. If you make use of the Careers Site(s), or submit 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, résumé, 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.

We do not require but you may also voluntarily choose to provide other relevant information as part of your application. We would prefer that you avoid submitting the following sensitive information, except where such information is legally required: 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 veteran status. To the extent the personal information you provide contains details of the information referenced in the preceding paragraph or your job evaluations or educational records, you expressly authorize Fidelity to handle such details for the purposes of your job application.

Any information you submit 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/résumé, 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 your references or from a background check report in connection with your application, as permitted by applicable law.

**USE OF PERSONAL INFORMATION**

Personal information submitted 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, for example to,

- process your application;
- 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 and record services whether provided by a Fidelity company or a third party;
- conduct background checks if you are offered a job; and
- preserve our other legitimate interests, for example, for Fidelity’s administrative purposes, aggregate management reporting, internal training and as generally required to conduct our business.

The information you submit will be stored in the United States (and in the relevant jurisdiction(s) if the job relates to one of Fidelity’s affiliated entities outside of the United States). It will 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 will be added to Fidelity’s international candidate database and will be used for the purposes of considering whether your profile is suitable for other job vacancies at Fidelity. If you do not wish us to do this, please contact us at [employeeprivacy@fmr.com](mailto:employeeprivacy@fmr.com). If we elect to make you an offer, personal information you submit may be incorporated into our human resources system and used to manage the new-hire process. If you become an employee, any personal information that you submit 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 will 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. FMR LLC 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 (including countries other than where you are based that have a different data protection regime than is found in the country where you are based). If you are located in the European Economic Area (the "EEA") this may include countries outside of the EEA. A list of the affiliate companies that may jointly process your personal information is available upon request from [employeeprivacy@fmr.com](mailto:employeeprivacy@fmr.com). 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. You may obtain a copy of these measures by contacting [employeedataprivacy@fmr.com](mailto:employeedataprivacy@fmr.com).

#### **DATA RETENTION**

We are required to retain information relating to candidates applying for jobs within the United States. Personal information of candidates applying for jobs in other parts of the world 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](mailto: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/résumé), without any reason. Therefore, please retain your own copy of the personal information provided to us.

#### **PASSIVE INFORMATION COLLECTION: 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.

#### **ACCESS AND CORRECTION**

If you choose to register on a Careers Site, you may access, review, and 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 have submitted 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, we will be able to see what changes you have made and when you made those changes.

If you have any questions or concerns about how we otherwise process personal information please contact us at [employeeprivacy@fmr.com](mailto:employeeprivacy@fmr.com). 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. Please contact us at [employeeprivacy@fmr.com](mailto:employeeprivacy@fmr.com) with any such requests or contact the data protection officer responsible for your country or region, if applicable. For a list of data protection officers, please contact us at [employeeprivacy@fmr.com](mailto:employeeprivacy@fmr.com). 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 have provided to 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.

As applicable, you may lodge a complaint about the way we process your personal information with a supervisory authority of your country or region.

## **SECURITY**

We take reasonable precautions to safeguard the personal information transmitted between visitors and the Careers Site(s), as well as the personal information stored on our servers. 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.

If you have reason to believe that your interaction with us is no longer secure (for example, you feel that the security of any account you might have with us has been compromised), you must immediately notify us of the problem by contacting us at [employeeprivacy@fmr.com](mailto:employeeprivacy@fmr.com).

Fidelity hereby disclaims, as far as permitted by local laws, any liability for itself and its affiliated companies 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).

**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, which means we offer equal treatment to all applicants. 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 contains details 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; job evaluations or educational records, 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.

#### **ABOUT CHILDREN**

The Careers Site(s) is not intended for minors 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" legend on the top 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**

If you have questions or requests, please feel free to contact us at [employeeprivacy@fmr.com](mailto:employeeprivacy@fmr.com).

Remedies & Compliance (India Only)

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:

Name: Anand Misra

E-mail: [Grievance.Officer@fmr.com](mailto:Grievance.Officer@fmr.com)