

BNY MELLON CANADA EMPLOYEE PERSONAL INFORMATION PRIVACY NOTICE

Last Updated: February 28, 2019

The BNY Mellon affiliate responsible for your personal information will be the BNY Mellon affiliate identified in your employment contract or contract for services (“**BNY Mellon**”, “**we**”, “**us**”), and will be the data controller of your personal information. In addition, where the personal information is processed by other members of BNY Mellon for their own independent purposes, those BNY Mellon members will be independent controllers of your personal information.

This Privacy Notice (“**Notice**”) explains how we collect, use and share employees’ personal information, including:

- [What personal information do we process](#)
- [How BNY Mellon collects personal information](#)
- [The purposes for which personal information is processed and our legal basis for carrying out the processing](#)
- [Retention of personal information](#)
- [Security of personal information](#)
- [Disclosure and international transfer of personal information](#)
- [Your rights as a data subject](#)

We may amend this Notice from time to time to keep it up to date with legal requirements and the way in which we operate our business. If we make changes to this Notice, we will seek to inform you by notice on the BNY Mellon intranet or email (“**Notice of Change**”).

WHAT INFORMATION DO WE PROCESS?

Where permitted by the law of the jurisdiction in which you or your employer are is located and depending on your role, the benefits you are provided with and your circumstances, we may collect the following personal information about you for the purposes described in this Notice:

- **Personal details:** your title, name, previous or maiden name, gender, nationality, civil/marital status, date of birth, age, personal contact details (e.g. address, telephone or mobile number, e-mail), national ID number, immigration and eligibility to work information, driving licence, languages spoken, next-of-kin/dependant/emergency contact information, details of any disability and any reasonable adjustments required as a result;
- **Recruitment and candidate selection information:** skills and experience, qualifications, references, CV and application, interview and assessment data, background and verification information (e.g. results of credit reference check, financial sanction check and a basic disclosure criminal record check relating to unspent/unpardoned convictions), right to work verification, information related to the outcome of your application, details of any offer made to you;
- **Information related to your engagement:** contract of employment or engagement, work contact details (e.g. corporate address, telephone number, e-mail), employee or payroll number, photograph, work location default hours, default language, time zone and currency for location, your worker ID and various

system IDs, your work biography, your assigned business unit or group, your reporting line, your employee/contingent worker type, your hire/contract begin and end dates, terms and conditions of engagement, your cost centre, your job title and job description, your working hours and patterns, whether you are full or part time, your termination/contract end date, the reason for termination, your last day of work, exit interviews, references to be provided to prospective employers, status (active/inactive/terminated), position title, the reason for any change in job and date of change;

- **Regulatory information:** records of your registration with any applicable regulatory authority, your regulated status, including any criminal record or credit background checks which may be necessary, and any regulatory certificates and references;
- **Remuneration and benefits information:** your remuneration information (including salary/hourly plan/contract pay/fees information as applicable, allowances, overtime, bonus and commission plans), payments for leave/absence (e.g. holiday pay, sick pay, family leave pay), bank account details, grade, social insurance number, tax information, third party benefit recipient information (e.g. expression of wish and dependants information), details of any benefits you receive or are eligible for, benefit coverage start date, expense claims and payments, loans, deductions, salary sacrifice arrangements, childcare vouchers, share scheme participation, information and agreements;
- **Leave information:** attendance records, absence records (including dates and categories of leave/time-off requests and approvals), holiday dates, requests and approvals and information related to family leave or other special or statutory leave;
- **Absence management information:** absence history, fit notes, details of incapacity, details of work impact and adjustments, details of treatment and prognosis (to the extent relevant for your work), manager and Human Resources (HR) communications, return to work interviews, meeting records, medical reports (to the extent relevant for your work), occupational health reports;
- **Flexible working procedure information:** requests, consideration, correspondence, meeting notes and outcome records;
- **Restructure and redundancy records:** change plans, organisation charts, consultation records, selection and redeployment information;
- **Performance management information:** colleague and manager feedback, your appraisals and performance review information, outcomes and objectives, talent programme assessments and records, succession plans, formal and informal performance management process records;
- **Training and development information:** data relating to training and development needs or training received or assessments completed;
- **Disciplinary and grievance information:** allegations, complaints, investigation and proceeding notes, records and outcomes, including records of any discipline imposed;
- **Health and safety information:** health and safety audits, health and safety screening requests and results, risk assessments, incident reports;
- **Monitoring information:** closed circuit television footage, system and building login and access records, download and print records, call or meeting recordings, information sent or received using BNY Mellon's email or equipment, information captured by IT security programmes and filters;
- **Employee claims, complaints and disclosures information:** subject matter of employment or contract based litigation and complaints, pre-claim conciliation, communications, settlement discussions, claim

proceeding records, employee involvement in incident reporting and disclosures and records of any settlements or the outcome of any litigation and/or complaints;

- **Equality and diversity information (where authorised by law):** information regarding gender, age, race, nationality, religious belief, sexuality or other protected ground information (reported anonymously for equal opportunities monitoring purposes); and
- Any other personal information that you choose to provide to us during the course of your employment, whether verbally or in written form.

SENSITIVE AND SPECIAL CATEGORIES OF PERSONAL INFORMATION

Where permitted by the law of the jurisdiction in which you or your employer are located and depending on your role, the benefits you are provided with and your circumstances, we may collect and process a limited amount of the following personal information falling into special categories, sometimes called "sensitive personal information":

- Health-related details, including any reasonable adjustments that we may be required by law to make to your working arrangements;
- Information revealing racial, ethnic, national origin or other protected ground information;
- Judicial information, including the results of criminal or police records checks which can include details of offences, alleged offences and sentences and information from other intelligence sources (subject to relevant local laws and record retention periods);
- Marital status and next of kin; and
- Political opinions, religious beliefs or other similar beliefs and sexual orientation, should you choose to provide any such information to us.

HOW DOES BNY MELLON COLLECT INFORMATION?

We collect your personal information from a variety of sources, but in most circumstances directly from you. You will usually provide this information directly to your managers or local HR contact, or enter it into our systems (for example, through Employee Self Service (ESS), your participation in HR processes, emails and instant messages which may be recorded electronically or manually). In addition, further information about you will come from your managers, HR or occasionally from your colleagues.

Where permitted by the law of the jurisdiction in which you or your employer are located , we may also obtain some information from third parties, e.g. references from a previous employer, medical reports from external professionals, information from tax authorities, benefit providers or where we employ a third party to carry out a background check or, occasionally, from clients.

In some circumstances, personal information may be collected indirectly from monitoring devices or by other means (for example, building and location access control and monitoring systems, CCTV, telephone logs and recordings, instant messages emails and Internet access on BNY Mellon equipment or systems), if and to the extent authorised by applicable laws. In these circumstances, the personal information may be collected by BNY Mellon or a third party provider of the relevant service. This type of personal information is generally not accessed on a routine basis but access is possible. Access may occur, for instance, in situations where BNY Mellon is investigating possible violations of Company policies, or where permissible by law, BNY Mellon may conduct random reviews of its systems to ensure appropriate activities are being carried out. Where we ask you to provide personal information to us on a mandatory basis, we will inform you of this at the time of collection and in the event that particular information is required by the contract or statute this will be

indicated. The failure to provide mandatory information will mean that we cannot carry out certain HR processes. For example, if you do not provide us with your bank details, we will not be able to pay you. In some cases it may mean that we are unable to continue with your employment or engagement, as BNY Mellon will not have the personal information we believe to be necessary for the effective and efficient administration and management of our relationship with you.

Apart from personal information relating to you, you may also provide BNY Mellon with personal information of third parties, notably your dependants and other family members, for purposes of HR administration and management, including the administration of benefits and someone to contact in an emergency. Before you provide such third party personal information to BNY Mellon you must first inform these third parties of any such information that you intend to provide to BNY Mellon and of the processing to be carried out by BNY Mellon, as detailed in this Notice.

WHAT ARE THE PURPOSES FOR WHICH PERSONAL INFORMATION IS PROCESSED AND WHAT IS OUR LEGAL BASIS FOR CARRYING OUT THE PROCESSING?

Your personal information is collected and processed for various purposes, in accordance to the law of the jurisdiction in which you or your employer are located and/or any applicable collective bargaining agreements. We have set out in this Notice the purposes for which we may use your personal information. Personal information may occasionally be used for purposes not obvious to you where the circumstances warrant such use, e.g. in investigations or disciplinary proceedings. We may, where we think it is necessary, provide you with additional information in relevant HR policies to ensure that you understand how your personal information may be used.

The legal basis on which we process your personal information

We will only collect, use and share your personal information where we are satisfied that one or more of the following lawful bases apply (subject to any local law derogations stated herein):

- The processing and use is necessary to establish, manage or terminate an employment relationship, including conducting an investigation related thereto;
- The processing is necessary for compliance with a provision of law under the law to which BNY Mellon is subject, for example, disclosing information to local tax authorities, making statutory payments, avoiding unlawful termination, avoiding unlawful discrimination, meeting statutory record keeping requirements or health and safety obligations;
- The processing is necessary in the context of a business transaction to which BNY Mellon and you are parties;
- The processing of personal information is publicly available information and will be used for a purpose that is consistent with the purpose of its public availability;
- The processing is necessary for purposes permitted by the law of the jurisdiction in which you or your employer is located for specific purposes, such as preventing fraud, preventing terrorist financing, diversity monitoring;
- The processing is necessary for complying with an order made by either the court or regulator;
- The processing of personal information is necessary to respond to an emergency that threatens the life, health or security of an individual or the public; or
- The processing is for purpose of contacting the next of kin or friend of an injured, ill or deceased individual.

Consent

Where permitted by the law of the jurisdiction in which you or your employer are located, the processing of your personal information (i.e. collecting, using and/or sharing) may, in specific circumstances, be based on your consent. Consent will be used where there is voluntary processing for special category data where no other legal justification applies, where the processing is at an employee's request or where the processing is required under the law of the jurisdiction in which your employer is located. Where consent is required for the processing in question, it will be sought from you separately to ensure that it is freely given, informed and explicit. Information regarding such processing will be provided to you at the time that consent is requested, along with the impact of not providing any such consent. BNY Mellon may also rely on implied consent as a legal basis to process and use your personal information to establish, manage, and terminate an employment relationship.

You should be aware that it is not a condition or requirement of your employment to agree to any request for consent from BNY Mellon, and that you have a right to revoke your consent at any time, by contacting your local HR representative.

The purposes for which we use your personal information and the lawful bases which apply

We have identified a number of purposes for collecting and processing your personal information. These are set out below together with the lawful bases which apply for each case:

	What we use your information for (if and to the extent permitted by the law of the jurisdiction in which you or your employer are located)	Lawful Basis	Our Processing Purpose
Recruitment and candidate selection	<ul style="list-style-type: none"> • Evaluate applications for employment and make decisions in relation to on-boarding of employees • Appropriate pre-employment screening including, where relevant and appropriate, identity check, right to work verification, reference check, credit check, financial sanction check, criminal record checks. • Making job offers, providing contracts of employment or engagement and preparing to commence your employment or engagement where you accept an offer from us • To contact you if you are not successful in your initial application should another potentially suitable vacancy arise • To deal with any query, challenge or request for feedback received in relation to our recruitment decisions • Monitoring programmes to ensure equality of opportunity and diversity 	<p>Subject to any local law derogations stated herein any or all of the following lawful bases may apply:</p> <ul style="list-style-type: none"> • Employment relationship/Policy • Legal Obligation • Consent (where required) • Implicit/ Implied Consent 	<ul style="list-style-type: none"> • Assessing the suitability of applicants to recruit the best person for each vacancy • Ensuring that candidates for employment or engagement do not pose an unacceptable risk to BNY Mellon or its clients • Maintaining an appropriate pool of talent who have shown an interest in working for BNY Mellon and who are potentially suitable candidates for employment • Providing feedback to candidates and defending a challenge or claim made in connection with our recruitment decision

	What we use your information for (if and to the extent permitted by the law of the jurisdiction in which you or your employer are located)	Lawful Basis	Our Processing Purpose
Ongoing management of all aspects of employees' relationships with BNY Mellon	<ul style="list-style-type: none"> • To manage and maintain HR records, files and systems, including technical support and maintenance for HR systems and managing electronic and hard copy records in line with BNY Mellon's retention schedules • Providing and administering remuneration, benefits, pensions and incentive schemes • Reimbursement of business costs and expenses • Making appropriate tax and public pension deductions and contributions • Allocating and managing duties and responsibilities and the business activities to which they relate, including business travel • To set and change building and system access permissions • Identifying and communicating effectively with employees • Including personal information in Group directories, skills databases and management information reporting • Where appropriate, publishing appropriate 	<p>Subject to any local law derogations stated herein any or all of the following lawful bases may apply:</p> <ul style="list-style-type: none"> • Employment relationship/Policy • Legal Obligation • Contractual obligation • Consent (where required) • Implicit/ Implied Consent 	<p>Managing BNY Mellon's workforce and operating our business</p> <ul style="list-style-type: none"> • Ensuring effective employee remuneration and management • Ensuring the effective allocation and organisation of work amongst employees • Ensuring clarity of employee duties and responsibilities • Facilitating access to appropriate locations and systems • Ensuring appropriate protection of BNY Mellon assets and third party assets we may hold • Facilitating effective communication and collaboration with, and between, employees and clients • Measuring and reporting on financial management and business performance • Setting objectives for employees • Setting appropriate standards of attendance, behaviour and performance, and taking appropriate action (including disciplinary measures) where standards or expectations are not met

	What we use your information for (if and to the extent permitted by the law of the jurisdiction in which you or your employer are located)	Lawful Basis	Our Processing Purpose
	<p>internal or external communications or publicity material, including via social media in appropriate circumstances</p> <ul style="list-style-type: none"> • Managing and operating performance reviews, capability, attendance and talent programmes • Managing grievances, disciplinary and performance, allegations (e.g. whistleblowing, harassment), complaints, investigations and disciplinary processes, and making related management decisions • Training, development, promotion, career and succession planning and business contingency planning • Consultations or negotiations with employees or representatives of employees • Where required by local law, processing details of membership of trade unions, works councils and other employee representative bodies and, with employee consent, to administer any associated subscriptions paid direct from salaries 		<ul style="list-style-type: none"> • Supporting career development and succession planning • Supporting fair, consistent, objective performance related reward • Addressing employee related concerns and issues • Seeking the views of its workforce and those that represent them on proposals which will impact on employees such as the development of new policies or working practices • Seeking the views of its workforce and giving them the opportunity to raise concerns or suggest improvements • Taking action to prevent discrimination and promote an inclusive and diverse workplace • Defending a challenge or claim made in connection with employment

	What we use your information for (if and to the extent permitted by the law of the jurisdiction in which you or your employer are located)	Lawful Basis	Our Processing Purpose
	<ul style="list-style-type: none"> • Conducting surveys for benchmarking and identifying improved ways of working and employee relations and engagement at work (these will often be anonymous and/or optional but may include profiling information such as age to support analysis of results) • Monitoring programmes to ensure equality of opportunity and diversity 		
Absence management and health and safety	<p>To the extent authorised by applicable laws:</p> <ul style="list-style-type: none"> • Processing information about absence • Processing medical information regarding physical or mental health or condition to: <ul style="list-style-type: none"> – assess eligibility for incapacity or permanent disability related remuneration or benefits, and eligibility for any leave of absence; – determine fitness for work; – facilitate a return to work; – make adjustments or accommodations to duties or the workplace; – make management decisions regarding employment or 	<p>Subject to any local law derogations stated herein any or all of the following lawful bases may apply:</p> <ul style="list-style-type: none"> • Employment Relationship/Policy • Legal Obligation • Contractual obligation • Vital Interest • Consent (where required) • Implicit/ Implied Consent 	<ul style="list-style-type: none"> • Managing health and safety risk • Supporting the welfare of employees, including referral to occupational health advisers • Taking steps to identify and mitigate risks to employees' health, safety or welfare • Ensuring fitness for work • Managing absence and incapacity impacting on the ability of employees to perform their roles • Comply with legal obligations regarding accommodation and health and safety

	What we use your information for (if and to the extent permitted by the law of the jurisdiction in which you or your employer are located)	Lawful Basis	Our Processing Purpose
	<p>engagement or continued employment or engagement or redeployment; and</p> <ul style="list-style-type: none"> – conduct related management processes 		
Compliance monitoring, security and systems use	<ul style="list-style-type: none"> • Measuring the performance analytics of BNY Mellon IT systems, monitor usage of BNY Mellon resources and systems, analyse times, locations and activities whilst logged into the network and improve the usability of BNY Mellon technology and tools in accordance with applicable local laws • Auditing, monitoring, investigation and compliance monitoring activities in relation to BNY Mellon policy, the BNY Mellon’s Code of Conduct, applicable law, the prevention and detection of criminal activity and to protect BNY Mellon’s assets and premises • Accessing, monitoring, recording, and using information contained in emails, instant messages, telephone calls and other electronic communications, as well as internet access and use via BNY Mellon 	<p>Subject to any local law derogations stated herein any or all of the following lawful bases may apply:</p> <ul style="list-style-type: none"> • Employment Relationship/Policy • Legal Obligation • Consent 	<ul style="list-style-type: none"> • Putting in place appropriate policies and procedures for employees, measuring compliance, detecting breaches and taking action to address non-compliance • Carrying out risk assessments, detecting and preventing crimes or criminal activity or other unlawful or unethical activity • Ensuring compliance with other legal or regulatory requirements placed upon us or related official guidance • Providing ways for employees and others to report conduct or compliance issues • Considering and investigating matters drawn to BNY Mellon’s attention • Protecting BNY Mellon’s IT network, systems and business devices to maintain the integrity and security of data and business information and facilitating records management

	What we use your information for (if and to the extent permitted by the law of the jurisdiction in which you or your employer are located)	Lawful Basis	Our Processing Purpose
	<p>systems in accordance with local laws</p> <ul style="list-style-type: none"> • Preventing and investigating crime against employees, clients, BNY Mellon property and premises (which includes CCTV monitoring) • Undertaking ongoing criminal record checks where legally required, e.g. as part of financial services certification regimes • Transaction monitoring to prevent and detect financial market abuse, in accordance with local laws 		<ul style="list-style-type: none"> • Locating information through searches where required for a legitimate business purpose • Ensuring the safety and security of employees, clients and the public, and their information
Business transformation, business development and supplier management	<ul style="list-style-type: none"> • Planning, managing and carrying out restructuring or redundancies or other change programmes including appropriate consultation, selection, alternative employment searches and related management decisions • Planning, due diligence and implementation in relation to a commercial transaction or service transfer involving BNY Mellon that impacts on your relationship with BNY Mellon, e.g. mergers and acquisitions or a transfer of your employment under applicable automatic transfer rules 	<p>Subject to any local law derogations stated herein any or all of the following lawful bases may apply:</p> <ul style="list-style-type: none"> • Legal Obligation • Employment Relationship/Policy • Completed or Pending Business Transaction • Consent 	<ul style="list-style-type: none"> • Managing BNY Mellon’s business operations in the most effective and efficient way • Making decisions relating to the future of the business • Ensuring appropriate employee engagement in transformation or change proposals • Ensuring fair and effective implementation of BNY Mellon decisions impacting employees • In the event of an outsourcing, acquisition or business transfer transaction, ensuring that the workforce, employee costs and liabilities are sufficiently understood

	What we use your information for (if and to the extent permitted by the law of the jurisdiction in which you or your employer are located)	Lawful Basis	Our Processing Purpose
	<ul style="list-style-type: none"> • For tenders for work or client team records or to operate the relationship with clients or support client delivery or vetting requirements including the use of contact or professional CV details or photographic images • To operate the relationship with other third parties such as suppliers including disclosure of information to data processors for the provision of services to BNY Mellon 		<p>prior to committing to the transaction and ensuring a smooth transition of employees if a transaction goes ahead</p> <ul style="list-style-type: none"> • Ensuring effective business development and building/maintaining successful client relationships • Ensuring effective communication with, and engagement of, suppliers
Responding to legal and regulatory requests	<ul style="list-style-type: none"> • To comply with lawful requests by public authorities, discovery requests, or where otherwise required or authorised by applicable laws, court orders, government regulations, or regulatory authorities (including without limitation data protection, tax and employment), whether within or outside your country 	<p>Subject to any local law derogations stated herein any or all of the following lawful bases may apply:</p> <ul style="list-style-type: none"> • Legal Obligation • Consent 	<ul style="list-style-type: none"> • Co-operating with relevant public authorities, government bodies or regulators for the provision of information, subject to the appropriate internal controls and approvals and after considering the impacted individuals' privacy rights. BNY Mellon wishes to maintain its reputation as a good corporate citizen and to act ethically and appropriately in all the countries in which it does business
Litigation Management	<ul style="list-style-type: none"> • To defend or advance BNY Mellon's position in respect of pending or actual litigation in 	<p>Subject to any local law derogations stated herein any or all of the following lawful bases may apply:</p>	<ul style="list-style-type: none"> • If BNY Mellon becomes involved in litigation, it may, in the course of the litigation or

	What we use your information for (if and to the extent permitted by the law of the jurisdiction in which you or your employer are located)	Lawful Basis	Our Processing Purpose
	which BNY Mellon is involved (whether BNY Mellon commenced or is defending such litigation, or has been added as a party)	<ul style="list-style-type: none"> • Legal Obligation • Consent 	investigating the circumstances of the events that led to the litigation, process personal information, and/or be required to disclose such information to other parties involved in the litigation.
Termination of employment and managing post-employment relationships	<ul style="list-style-type: none"> • Complying with reference requests where BNY Mellon is named by the individual as a referee • Administering termination and post-termination matters, e.g. outplacement services, liaison with employee legal representatives, enforcing restrictive covenants, loan repayments, overpayments, expense reimbursements, employee benefits • Conduct termination and post-termination litigation 	Subject to any local law derogations stated herein any or all of the following lawful bases may apply: <ul style="list-style-type: none"> • Employment Relationship/Policy • Legal Obligation • Consent 	<ul style="list-style-type: none"> • Legitimate interests of a new employer to receive confirmation of basic employment details from BNY Mellon for the purposes of confirming a former employee's employment history including dates of employment and role • Ensuring an effective exit process for employees • Lodging or defending a challenge or claim made in connection with employment or employment termination

RETENTION OF PERSONAL INFORMATION

BNY Mellon endeavours to keep personal information as current as possible and to delete or anonymise irrelevant or excessive personal information as soon as reasonably practicable. The retention of personal information relating to both current and former employees and contractors will endure in accordance with the Global Records Management Policy I-D-200 that provides a framework for managing BNY Mellon records.

SECURITY OF PERSONAL INFORMATION

BNY Mellon takes the protection of your personal information very seriously. BNY Mellon has appropriate organisational and technical measures in place, as required by the law of the jurisdiction in which you or your employer are located, to ensure the security of the personal information it collects. Further details in relation

to the control, processing, storage, transmission and communication of information, including personal information, can be found on the Compliance and Information Risk Management intranet sites.

DISCLOSURE AND INTERNATIONAL TRANSFER OF PERSONAL INFORMATION

For the above purposes and subject to the law of the jurisdiction in which you or your employer are located, personal information may be transferred within or outside of the jurisdiction where you are employed or perform work, either within BNY Mellon or to third parties, including, but not limited to:

- any holding company, subsidiary, affiliate or any other associated entity of BNY Mellon, where such disclosure is necessary to provide employment related services or to manage our business;
- certain third party including suppliers and service providers including; labour law consultants; government departments; travel agencies; actuaries; fund managers; banks; insurers; insurance brokers; credit reference agencies; credit institutions; pension providers; trustees; auditors; legal and tax advisers; investigators; medical practitioners; IT personnel; business consultants or professional advisors; courts and tribunals; law enforcement agencies; relevant regulatory authorities; prospective employers; employment and recruitment agencies; educators and examining bodies; mentors; counsellors; your immediate family, associates or authorised representatives and outplacement service providers.

BNY Mellon may disclose personal information when required by law or court order, or as requested by any government or regulator or law enforcement authority or agency, or if it determines in good faith that disclosure is otherwise necessary or advisable, including and without limitation to protect BNY Mellon's rights or property or in circumstances which BNY Mellon or its advisers consider it to be appropriate or related to any of the purposes for which the personal information is collected.

Where permitted by the law of the jurisdiction in which you or your employer are located, BNY Mellon may also disclose personal information to a third party where it is necessary to do so in order to protect or pursue BNY Mellon's legitimate interests (ensuring this is proportionate and limited to that information which is strictly necessary in the circumstances). This may include disclosure to a party with whom BNY Mellon is in negotiation for the sale or transfer of a business, assets or services. BNY Mellon will take appropriate steps to ensure that the recipient of personal information in such circumstances puts in place an adequate level of protection for such personal information in accordance with applicable legal requirements.

BNY Mellon operates on a global basis. Accordingly, your personal information may be transferred and stored in countries outside of your jurisdiction (such as the USA and India), that are subject to different standards of data protection. Where BNY Mellon transfers personal information internally within BNY Mellon or to any third party between different jurisdictions, for the purposes outlined in this document, it will take appropriate steps to ensure that transfers are in accordance with applicable law and carefully managed to protect your privacy rights and interests. To this end:

- Transfers within BNY Mellon entities will be conducted in a manner that adheres to data protection laws;
- Where we transfer your personal information outside BNY Mellon, or to third parties who help provide our products and services, we obtain contractual commitments from them to protect your personal information with equivalent standards; or
- Where we receive requests for information from law enforcement or regulators, we carefully validate these requests before personal information is disclosed.

You have a right to contact our Data Protection Officer (details provided at the end of this document) for more information about the safeguards we have put in place (including a copy of relevant contractual

commitments) to ensure the adequate protection of your personal information when this is transferred as mentioned above.

YOUR RIGHTS AS A DATA SUBJECT

Right to access, correct and delete your personal information

- BNY Mellon aims to ensure that all personal information is correct, subject to changes to personal information and personal circumstances (for example, change of address and bank accounts) being notified promptly.
- You have the right to request access to/ a copy of any of your personal information that BNY Mellon may hold, and to request correction of any inaccurate information relating to you. You furthermore have the right to request deletion of any irrelevant information we hold about you.
- You can see and update some of this information yourself via Employee Self Service. However, to correct/update other information, you will need to contact local Human Resources.
- Your right to access the personal information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the personal information that we hold about you.
- We may charge you a fee to access your personal information; however, we will advise you of any fee in advance.

Right to withdraw consent

- Where we have relied on your consent to process particular information and you have provided us with your consent to process the information, you have the right to withdraw such consent at any time. You can do this by (i) in some cases deleting the relevant information from the relevant HR system (although note that in this case it may remain in back-ups and linked systems until it is deleted in accordance with our Global Records Management Policy I-D-200); or (ii) contacting your local Human Resources contact.

Right to complain

- If you consider that the processing of your personal information infringes applicable law, you have the right to lodge a complaint with the:
- [Office of the Privacy Commissioner of Canada](#)
- [Commission D'accès à L'information du Quebec](#)
- [Office of the Information and Privacy Commissioner for British Columbia](#)
- [Office of the Information and Privacy Commissioner of Alberta](#)
- If you have any questions, concerns or complaints regarding our compliance with this notice and applicable data protection laws, or if you wish to exercise your rights, we encourage you to first contact your local HR representative or our Data Protection Officer. We will investigate and attempt to resolve complaints and disputes and will make every reasonable effort to honour your wish to exercise your rights as quickly as possible and in any event, within the timescales provided by data protection laws.

- The Data Protection Officer can be contacted in the following ways:

By email: trmglobalprivacy@bnymellon.com

By post: The Data Protection Officer
BNY Mellon
160 Queen Victoria Street
London EC4V 4LA

ADDITIONAL FAIR PROCESSING NOTICES

We may undertake certain processing of personal information which is subject to additional Fair Processing Notices and we shall bring these to your attention.