

BROADPOINT CONSULTING SERVICES AND ITS AFFILIATES

JOB APPLICANT PRIVACY NOTICE

Effective Date: February 2026

1. Purpose

Broadpoint Consulting Services and its affiliates (collectively, “Broadpoint,” “the Company,” “we,” “us,” or “our”) are committed to protecting the privacy and security of personal information collected from job applicants.

This Job Applicant Privacy Notice (“Notice”) establishes the Company’s practices regarding the collection, use, disclosure, safeguarding, and retention of applicant personal information in accordance with applicable federal law and Missouri law, including but not limited to:

- The Fair Credit Reporting Act (FCRA)
 - The Americans with Disabilities Act (ADA)
 - Title VII of the Civil Rights Act
 - Applicable Equal Employment Opportunity (EEO) regulations
 - Missouri data security and breach notification law (Mo. Rev. Stat. § 407.1500)
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2. Scope

This Notice applies to all job applicants applying for employment with Broadpoint Consulting Services and its affiliates within the United States, including applications submitted online, in person, or through third-party recruiters.

This Notice does not apply to employees after hire, who are governed by separate internal privacy and data governance policies.

3. Categories of Personal Information Collected

Broadpoint may collect the following categories of personal information during the recruitment and hiring process:

A. Identifiers

- Full name
- Address
- Email address
- Telephone number
- Date of birth (where required)

B. Professional and Employment Information

- Resume/CV and cover letter
- Education history and transcripts (if required)
- Employment history
- Professional licenses and certifications
- References

C. Background and Screening Information

- Information necessary to conduct background checks in compliance with the Fair Credit Reporting Act
- Work authorization and immigration documentation
- Motor vehicle records (if job-related)

D. Sensitive Personal Information

- Social Security number
- Government-issued identification numbers
- Health or disability information (only when voluntarily provided or required for reasonable accommodation under applicable law)

E. Voluntary EEO Information

- Gender
- Race/ethnicity
- Veteran status
- Disability status

Sensitive information is collected only when legally required or job-related and consistent with business necessity.

4. Sources of Information

Broadpoint may collect applicant information from:

- Applicants directly
 - Online application portals
 - Recruiting agencies
 - Professional references
 - Background screening providers
 - Publicly available professional sources
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5. Purpose of Processing

Applicant personal information is processed for legitimate business and legal purposes, including:

- Evaluating qualifications and suitability for employment
- Verifying information provided
- Conducting background checks consistent with FCRA and applicable law
- Communicating with applicants
- Complying with legal, tax, regulatory, immigration, and workplace safety requirements
- Defending against legal claims
- Workforce planning and recruiting administration within Broadpoint and its affiliates

Broadpoint does not sell applicant personal information.

6. Disclosure of Personal Information

Broadpoint may disclose applicant information as follows:

A. Service Providers

To third-party vendors providing recruiting platforms, applicant tracking systems, background screening services, IT services, or HR administrative support. Such providers are contractually obligated to maintain confidentiality and implement appropriate safeguards.

B. Affiliates

Among Broadpoint Consulting Services and its affiliates for centralized recruiting, compliance, and legitimate business administration purposes.

C. Legal and Regulatory Authorities

When required by federal or Missouri law, subpoena, court order, or to protect the Company's legal rights or the safety of individuals.

7. Data Security

Broadpoint maintains reasonable administrative, technical, and physical safeguards designed to protect applicant personal information against unauthorized access, disclosure, alteration, or destruction, consistent with applicable law.

In the event of a data breach involving personal information as defined under Missouri law, Broadpoint will provide notice as required by Mo. Rev. Stat. § 407.1500 and other applicable laws.

8. Data Retention

Applicant personal information will be retained only for as long as necessary to:

- Fulfill the purposes described in this Notice
 - Comply with federal and state recordkeeping requirements
 - Consider applicants for future employment opportunities within Broadpoint and its affiliates.
 - When we dispose of information, we use secure means, such as either physically or electronically erasing information or making it anonymous in a non-recoverable manner.
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9. Policy Administration and Updates

This Notice shall be reviewed periodically by the Human Resources and/or Legal Department. Broadpoint Consulting Services and its affiliates reserve the right to amend this Notice at any time. Updates will be reflected by a revised Effective Date.