

## Varo U.S. Candidate Privacy Notice

**Effective Date:** 04/07/2026

### 1. Introduction

Varo Bank, N.A. ("we," "us," or "our") is committed to protecting the privacy and security of your personal information. This Candidate Privacy Notice ("Notice") explains how we collect, use, disclose, and retain the personal information of individuals applying for employment with us in the United States.

### 2. Categories of Personal Information We Collect

During the recruitment process, we may collect the following categories of personal information:

- **Identifiers:** Name, alias, postal address, email address, telephone number, IP address, and similar identifiers.
- **Professional or Employment-Related Information:** Resume, CV, cover letter, work history, references, and interview notes.
- **Non-Public Education Information:** Transcripts, degrees, and certifications.
- **Sensitive Personal Information:** Government-issued identifiers (Social Security number, driver's license, passport) for background checks, and optionally provided demographic information (race, ethnicity, gender, veteran status, disability status) collected for equal opportunity monitoring.
- **Audio, Electronic, Visual, or Similar Information:** Recordings of phone or video interviews.

### 3. Sources of Personal Information

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

- **Directly from You:** Through job applications and interviews.
- **From Third Parties:** Recruiters, employment agencies, background check providers, credit reporting agencies, and references.
- **Publicly Accessible Sources:** Professional networking sites (e.g., LinkedIn).

### 4. Purposes for Collecting Personal Information

We use your personal information for the following business purposes:

- Evaluating your skills, qualifications, and suitability for the role.
- Communicating with you regarding your application and the interview process.
- Verifying your information and carrying out background and reference checks in accordance with applicable laws.
- Complying with legal and regulatory obligations.

- Onboarding processes.

## 5. Interview Recordings

To ensure quality, facilitate training, and allow multiple stakeholders to review your candidacy, we may record telephone and video interviews.

- **Notice and Consent:** We will inform you before recording any interview. Continuing with the interview after such notice constitutes your consent to the recording, as required by applicable state laws, including two-party/all-party consent states.

## 6. Use of Artificial Intelligence and Automated Processing

We may utilize Artificial Intelligence (AI) and automated tools to assist in evaluating applications and streamlining our recruitment process. These tools do not replace human discretionary decision making.

- **Automated Screening:** We may use AI-powered Applicant Tracking Systems (ATS) to parse resumes, match candidate skills to job requirements, and assist our recruitment team in identifying qualified candidates.
- **Automated Employment Decision Tools (AEDT) or Automated Decision Systems (ADS):** If you are applying for a position we may use AEDTs to assess your qualifications. Information regarding the specific job qualifications which may be assessed by the tool can be found in the job posting. For additional information, contact [people@varomoney.com](mailto:people@varomoney.com).

## 7. Disclosure of Personal Information

We may share your personal information with:

- **Service Providers:** Third parties who perform services on our behalf, such as background check vendors and HR software providers. These providers are bound by strict data protection agreements.
- **Legal and Regulatory Authorities:** To comply with legal obligations, including court orders or subpoenas.

## 8. Data Retention

We retain your personal information for as long as necessary to fulfill the purposes outlined in this Notice. If your application is successful, this information will become part of your employee file. If your application is unsuccessful, we will retain your information to comply with legal obligations and to consider you for future opportunities, unless you request its deletion (subject to legal exceptions).

## 9. California Privacy Rights

If you are a resident of California, the California Privacy Rights Act (CPRA) provides you with specific rights regarding your personal information:

- **Right to Know:** You have the right to request details about the categories and specific

pieces of personal information we have collected about you.

- **Right to Delete:** You have the right to request the deletion of your personal information, subject to certain exceptions.
- **Right to Correct:** You have the right to request correction of inaccurate personal information we hold about you.
- **Right to Limit the Use of Sensitive Personal Information:** We only use Sensitive Personal Information for purposes strictly necessary to the recruitment process and legal compliance; therefore, we do not use it to infer characteristics about you outside of permitted legal bounds.
- **Right to Non-Discrimination:** We will not discriminate or retaliate against you for exercising your privacy rights.

**We do not sell job applicant personal information.**

## **10. How to Exercise Your Rights and Contact Us**

To exercise your rights, or if you have questions or concerns about this Notice or our privacy practices, please contact us:

- **Email:** [people@varomoney.com](mailto:people@varomoney.com)