

## U.S. JOB APPLICANT PRIVACY NOTICE

In this notice, “we”, “us” and “our” means Allspring Global Investments<sup>1</sup>, being the entity to which you are applying to work.

### **About this privacy notice**

This privacy notice sets out the categories of your personal information we collect and the purposes for which we use it.

By **personal information** we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular **consumer** or household. Personal information does not include consumer information that is deidentified or aggregate consumer information. Please read the information set out below before submitting your resume and/or application form to us.

### **Personal information that we collect about you**

We will collect and process the following personal information about you:

- **Information that you provide to us or one of our affiliates.** We will process information that you give us by submitting any applications. This information is likely to include:
  - your full name, date of birth, gender, nationality, education and qualification details, marital status, home address and home telephone number, mobile telephone number, email address, employment history, other application details, your resume, copies of your transcripts and/or education certificates, writing sample, interview information, registrations, certifications and licenses, if provided;
  - information regarding your previous work experience and salary or salary expectations, bonus, commissions, stock, long-term incentives and benefit entitlements, as applicable;
  - immigration information, including a copy of your passport, driver’s license, visa and/or work permit;
  - disability information; and
  - diversity monitoring information (including race, ethnic origin, gender and sexual orientation).
- **Information we obtain from other sources.** This is likely to include information about you, such as:
  - details of your suitability to work with us, your past performance at work, your character, verification of the information that you provide to us as part of your application, and if legally permitted, any history concerning criminal convictions, from third party references that you provide to us, from your previous and/or current employers, opinions expressed by others about you and from third party background checking services or a previous employer or other referee.

### **How we use your personal information**

Your personal information may be stored and processed by us in the following ways and for the following purposes:

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<sup>1</sup> Allspring Global Investments is the trade name used by the following entities: Allspring Global Investments Holdings, LLC, Allspring Global Investments, LLC, Allspring Funds Distributor, LLC, Allspring Funds Management, LLC, Allspring Global Investments (UK) Limited, Allspring Global Investments Luxembourg S.A., Allspring Global Investments (Singapore) Pte Ltd, Allspring Global Investments (Hong Kong) Limited, and Allspring Global Investments (Japan) Ltd.

- to assess your job application (including, in some cases, verifying your qualifications, education and references with those third parties you name), for administrative purposes during the recruitment process and to make recruitment decisions;
- to check your right to work in the relevant jurisdiction;
- to allow us to monitor for equal opportunities;
- to make reasonable adjustments in the case of disability;
- for compliance with any legal or regulatory obligation to which we are subject (including compliance with any request from regulatory authorities or other relevant public authorities);
- for the prevention and detection of crime or fraud, subject to local law; and
- in the context of the possible sale or restructuring of all or part of our business or as otherwise permitted or required by law.

In certain circumstances, your failure to provide personal information that we request from you may impact our ability to meet the above purposes.

### **How to contact us**

If you would like further information on the collection or use of your personal information, please submit questions, comments and requests by contacting us at [AllspringPrivacy@Wellsfargo.com](mailto:AllspringPrivacy@Wellsfargo.com).

## **EMEA JOB APPLICANT PRIVACY NOTICE**

### **1. ABOUT THIS PRIVACY NOTICE**

1.1 As part of any recruitment process, Allspring Global Investments collects and processes personal data relating to job applicants. Allspring Global Investments is made up of several different legal entities<sup>2</sup> so when we mention **Allspring, we, us** or **our** in this Privacy Notice, we are referring to the relevant entity in the Allspring Global Investments group responsible for processing your personal data (being the **data controller**) as set out below:

- If you apply for a role in Luxembourg, Allspring Global Investments Luxembourg S.A., located at 33, Rue de Gasperich, H20 Building Floor 2, L-5826 Hesperange, Luxembourg;
- If you apply for a role in Germany, Allspring Global Investments Luxembourg S.A., Frankfurt Branch, located at Neue Mainzer Strasse 46-50, Frankfurt, Germany, 60311;
- If you apply for a role in the United Kingdom, Allspring Global Investments (UK) Limited, located at Bow Bells House, 1 Bread St, London EC4M 9BE, United Kingdom.

1.2 This privacy notice sets out the categories of your personal data we collect, how we collect it, what we use it for and with whom we share it, in accordance with the European General Data Protection Regulation (EU Regulation 679/2016 – **GDPR**), where applicable, the UK General Data Protection

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Regulation (**UK GDPR**), and any applicable national laws and regulations supplementing GDPR and the UK GDPR (the **Privacy Notice**).

1.3 By **personal data** we mean any information relating to you such as your name or contact details as well as any other information that you provide to us about yourself or, as the case may be, other individuals. Personal data does not include data which has been anonymised, such as data from equal opportunities monitoring carried out on an anonymised basis.

1.4 By **data controller** we mean that we are responsible for deciding how we hold and use personal data about you. Should you have any questions about this Privacy Notice you can contact us at **AllspringPrivacy@wellsfargo.com**.

1.5 This Privacy Notice also explains how we process personal data that you provide to us about other individuals and you should transmit this Privacy Notice to such individuals or otherwise advise them of its content.

**2. WHAT INFORMATION DO WE COLLECT ABOUT YOU AND WHAT DO WE USE IT FOR?**

2.1 The types of personal data about you which we may collect, store and use are set out in the table below and in each case we have specified the purpose and our ‘lawful basis’ for processing it. The law specifies certain ‘lawful bases’ for which we are allowed to use your personal data. Most commonly, we will rely on one or more of the following lawful bases for processing your personal data:

- (a) where it is necessary for **compliance with a legal obligation** to which we are subject; and/or
- (b) where it is necessary for the **performance of the contract**; and/or
- (c) where it is necessary for the purposes of the **legitimate interests** pursued by us or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms, which require protection of your personal data.

2.2 Where Allspring relies on legitimate interests as a reason for processing personal data, it has considered whether or not those interests are overridden by the rights and freedoms of job applicants and has concluded that they are not.

<b>Category of personal data</b>	<b>Examples</b>	<b>Purpose</b>	<b>Lawful basis for processing</b>	<b>Legitimate interest (where applicable)</b>
Contact details	Name (first, last), personal address, personal email address, details of whether you are 18 years of age or older and personal telephone number	To contact and communicate with the job applicant during the recruitment process and, more generally, for administration purposes during the recruitment process	Legitimate interests To take steps prior to entering and to enter into a contract with job applicants	To make contact and communicate with job applicants during recruitment process

Application related documents provided by candidates / permissible recruitment/ background check information	Application form, resume, registrations, certifications, academic records, pre-employment checks and licenses	To assess job applicant's suitability for the role and to keep records relating to our recruitment process	Legitimate interests	To make recruitment decisions and maintain standards of integrity and excellence in Allspring's workforce
Application documents generated by Allspring	Feedback and notes from interviews or other selection processes	To verify information provided by the job applicant, to assess the job applicant's application and make recruitment decisions, and to keep records relating to our recruitment process	Legitimate interests	To make and justify recruitment decisions and maintain standards of integrity and excellence in our workforce
Details about current remuneration	Current level of comprehensive salary to include but not limited to, bonus, commissions, stock, long term incentives, benefit entitlements	To make decisions about the financial package on offer	Legitimate interests	To ensure appropriate and attractive financial packages are offered to job applicants.

### 3. SPECIAL CATEGORIES OF PERSONAL DATA

- 3.1 Some personal data is more sensitive and requires a higher level of protection. This is personal data which reveals or contains:
- (a) racial or ethnic origin;
  - (b) political opinions;
  - (c) religious and philosophical beliefs;
  - (d) trade union membership;
  - (e) genetic data;
  - (f) biometric data;
  - (g) health data; and
  - (h) sex life or sexual orientation.
- 3.2 We may process special category personal data because we have a lawful basis for doing so, provided that the collection and processing of such personal data is permitted under the laws applicable in the relevant jurisdiction, and primarily because it is necessary:

(a) for the purposes of carrying out our obligations and exercising specific rights in the field of employment law (**employment law obligations**); and/or

(b) for the assessment of your **working capacity** as a potential future employee.

3.3 However, in limited circumstances we may also process special category data from job applicants to respond to and defend **legal claims**, or if you have given **explicit consent**.

3.4 The special categories of data about you which we may collect, store and process (provided that the collection, storage and processing of such personal data is permitted under the laws applicable in the relevant jurisdiction) are set out in the table below and in each case we have specified the purpose and our ‘lawful basis’ for processing it.

<b>Category of special categories of personal data</b>	<b>Examples</b>	<b>Purpose</b>	<b>Lawful basis for processing</b>
Medical/health information provided as part of application process	Details relating to any disability	To make reasonable adjustments to the recruitment process	Compliance with legal obligations and employment law obligations
Immigration information	Passport, driving license visa, work permit	To check your right to work in the country in which you are being employed	Compliance with legal obligations and employment law obligations
Information for equal opportunities monitoring	Race/ethnicity, sexual orientation, religion/philosophical belief, veterans and disability	To allow us to monitor equal opportunities, including in some jurisdictions to fulfil our legal obligations.	Compliance with legal obligations and employment law obligations

3.5 We do not require you to provide any special categories of personal data other than those outlined in the table above. We recommend that you do not include any additional special categories of personal data in your application as it is unlikely to be relevant to the application process.

#### **4. WHAT IF YOU DO NOT PROVIDE THE PERSONAL DATA WE REQUEST?**

You are not under any statutory or contractual obligation to provide any personal data which Allspring may request during the recruitment process. However, if you do not provide the personal data when requested, we may be prevented from complying with our legal obligations (such as complying with our obligations under the applicable labour laws) and we may therefore not be able to take your application further. We will notify you if this is the case.

#### **5. CHANGE OF PURPOSE**

We will only use your personal data for the purposes for which we collected it (as identified under *Purpose* above), unless we reasonably consider that we need to use it for another reason which is compatible with the original purpose. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

#### **6. ADDITIONAL SOURCES OF INFORMATION**

In addition to the data we collect from you during the recruitment process, we may receive personal information about you from third parties, such as:

(a) recruitment consultants;

- (b) background check agencies (including, in the UK, the Disclosure and Barring Service and in other jurisdictions the local equivalent);
- (c) former employers and any other named referees;
- (d) any governmental or regulatory body with supervisory authority over Allspring; and
- (e) where appropriate and in compliance with local law, third party job boards and social media platforms.

## **7. WITH WHOM WILL WE SHARE YOUR INFORMATION?**

- 7.1 Your information will be shared internally including with other entities in our group for the purposes of the recruitment process. This includes members of the HR and recruitment team, interviewers and managers in the business area to which the vacancy relates.
- 7.2 We will not share your personal data with external third parties, unless your application for employment is successful and it makes you an offer of employment. We may then share your personal data with former employers to obtain references for you, and employment background check providers to obtain necessary background checks to the extent admissible under applicable law. We may share your personal data with third parties, for example with a regulator or otherwise to comply with applicable law.
- 7.3 We may transfer the personal data we collect about you where necessary to other entities in our group in the United States, United Kingdom, European Economic Area (the **EEA**, including Germany, France, Italy and Luxembourg), Bahamas, Japan, Hong Kong and Singapore, in order to assess your eligibility and suitability for employment with Allspring. In relation to the United Kingdom and Japan an adequacy decision by the European Commission exists, meaning that these countries are deemed to provide an adequate level of protection for your personal data. The other non-EEA countries listed are not deemed to provide an adequate level of protection for your personal data.
- 7.4 Accordingly, we have put in place standard contractual clauses between entities within our group as necessary to ensure that your personal data is treated in a manner that is consistent with and respects the EEA and UK laws on data protection. We will always ensure that there is a legal basis and a relevant safeguard method for such data transfer so that your personal data is treated in a manner that is consistent with and respects the GDPR and UK GDPR (as applicable) and other applicable laws and regulations on data protection. If you require further information about this you can request it from [AllspringPrivacy@wellsfargo.com](mailto:AllspringPrivacy@wellsfargo.com).

## **8. HOW DOES ALLSPRING PROTECT DATA?**

Allspring takes the security of your personal data seriously. It has internal policies and controls in place and its staff are expected to comply with those to ensure that your data is not lost, accidentally destroyed, misused, altered or disclosed, and is not accessed except by our staff in the proper performance of their duties.

## **9. FOR HOW LONG DOES ALLSPRING KEEP PERSONAL DATA?**

- 9.1 We will retain your personal data for as long as necessary for the purpose outlined in this Privacy Notice, unless we are obliged to hold it for a longer period under applicable law. Notwithstanding the duration of the purpose, we may retain your information for a longer period if necessary to comply with our legal or professional obligations, enforce our agreements, or resolve disputes. In such circumstances, we will ensure your personal data and privacy is protected.
- 9.2 If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held are explained in our Employee Privacy Notice and are set out in our Records Management Policy. In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case it is no longer personal data.

9.3 Once we no longer require your personal data for the purposes for which it was collected, we will securely destroy your personal data in accordance with applicable laws and regulations.

## 10. YOUR RIGHTS IN RELATION TO YOUR INFORMATION

10.1 Depending upon the jurisdiction in which you are located, you may have the right to request that we modify, delete, or stop processing your personal data, and you might have the right to request that we provide the following information regarding the personal data we hold about you. These rights are to:

- (a) request **access** to your personal data (commonly known as a **data subject access request**) and request certain information in relation to its processing;
- (b) request **rectification** of your personal data;
- (c) request the **erasure** of your personal data;
- (d) request the **restriction** of processing of your personal data; and
- (e) **object** to the processing of your personal data.

You also have the right to receive your personal data in a structured, commonly used and machine-readable format and to have us transmit those personal data to another controller, if you have provided the personal data to us, if the processing is based on consent pursuant to Art. 6(1)(a) GDPR or Art. 9(2)(a) GDPR or on a contract pursuant to point Art. 6(1)(b) GDPR and the processing is carried out by us by automated means, subject, however, to legal restrictions which may apply.

10.2 If you want to exercise one of these rights please contact us at [AllspringPrivacy@wellsfargo.com](mailto:AllspringPrivacy@wellsfargo.com). You also have the right to make a complaint at any time to the relevant supervisory authority for data protection issues as applicable, including in the UK to the Information Commissioner's Office (**ICO**); in Luxembourg, the Commission Nationale pour la Protection des Données (**CNPD**); or with the competent data protection supervisory authority of your place of residence or stay or with any other competent data protection supervisory authority of an EEA member state.

### **Fees**

10.3 You will not usually have to pay a fee to access your personal data (or to exercise any of your other rights). However, subject to applicable data protection laws, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you**

10.4 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is to ensure that personal data is not disclosed to any person who has no right to receive it.

## 11. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact [AllspringPrivacy@Wellsfargo.com](mailto:AllspringPrivacy@Wellsfargo.com). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless there are compelling legitimate grounds for further processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

## 12. NO AUTOMATED DECISION MAKING

We do not apply automated decision making techniques.

**13. CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this Privacy Notice at any time, and we will make an updated copy of such Privacy Notice available on our website and notify you when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

**14. FURTHER INFORMATION**

If you require any further information, please do not hesitate to contact [AllspringPrivacy@Wellsfargo.com](mailto:AllspringPrivacy@Wellsfargo.com).

This privacy notice was last updated on 29 October 2021.