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Europe, Middle East and Africa (EMEA)

# Wells Fargo International Contingent Resource Privacy Notice

This notice applies to the United Kingdom (“**UK**”), countries in the European Union (“**EU**”) and the Dubai International Financial Center (“**DIFC**”) (collectively, “**EMEA**”).

**Effective:** 19 July 2024

"**We**," "**our**," "us" or "**Company**" refers to the Wells Fargo entity that has engaged the firm which hires you, or for which you otherwise work (the "**Vendor**"), to perform certain services for us. Under this engagement, you will be providing certain services to us on behalf of the Vendor, and we will act as the data controller for the processing of information relating to you ("**Personal Data**"). You should inquire with the Vendor as to which Wells Fargo entity is the controller of your Personal Data. If you are a contractor resource, that entity will be one of the entities listed in Section 11 located in the same country as the Vendor. If you are an external consultant, that entity will likely be one of the entities listed in Section 11. The Vendor can provide you with the engaging Wells Fargo entity's address and contact email address.

This document is referred to as the "**Notice**."

Wells Fargo is one of the largest financial institutions operating globally. We have affiliated companies around the world, including in the United States ("**Affiliated Entities**"). As described in Section 2, in order to manage your engagement with us, we need to process certain Personal Data, as described below.

**Name of group parent:** [Wells Fargo & Company](#)

**Headquarters location:** [420 Montgomery Street; San Francisco, CA 94104 USA](#)

Contact information for our EMEA Regional Privacy Officer is listed in Section 10. Wells Fargo & Company and its affiliates and subsidiaries are collectively “Wells Fargo.”

## 1. What Personal Data do we collect?

We may collect the following categories of Personal Data:

- **General data:** first name, middle name, and surname (including any previous names used); personal contact details (home and mobile telephone numbers, email addresses, and home address); date and place of birth; citizenship; marital status; gender; data on your background and schooling to understand your social mobility; and veteran/military status.
- **Position or hire / work description:** hiring entity; title; position held; length of tenure and work authorization status.

- **Identification and Authentication data:** national or governmental identification such as passport or national identification card; driver's licence; national insurance number or tax and/or social insurance number; information required for tax reporting; home address and telephone number; documents that verify address; date of birth; country of domicile; documents that verify work status; and signature authorization or information we use to identify and authenticate you e.g. your signature or additional information we get from external sources that we need for compliance purposes.
- **Financial data and payment details:** salary and other income; bank account details and financial relationships.
- **Background or credit check data:** to the extent required or permitted by local law, credit check information and background check information including credit and criminal checks and screening; prior employment history; current and past directorships held by you or by members of your immediate family; data associated with verification of politically exposed persons; education history; professional memberships and qualifications; professional or personal references; and other information contained in your curriculum vitae or resume.
- **Qualifications data:** information concerning any qualifications you hold e.g. university education, professional certifications.
- **Visa and work permit data:** copies of your passport; birth certificate; national identification card; existing and expired visa(s) and other permit details; and all such information about relevant members of your family (such as your parents, spouse, domestic/civil partner, children and/or other dependents), if required by law.
- **Emergency contact information:** first name and last name and contact information of a family member to be contacted in an emergency.
- **Work contact details:** work address; work phone numbers; fax numbers; and work email address.
- **Contract data:** terms and conditions of your contract; pay and changes to the terms and conditions of your hire or work relationship.
- **Organizational data:** title; job position; function; employee ID; department; business unit; supervisor's name and higher-level supervisor(s); cost center; signing authority; skills; work experience at the Company; user ID; information technology access rights (such as user and system IDs and passwords); and electronic content you produce using company systems.
- **Work-related data:** information on timesheets for your work (to the extent this applies to you), any data that may be collected in the course of contractual services including business travel; business expenses; working from home arrangements (if any); use of Company facilities; training activity; and attendance at the office and Company events.
- **Access or system usage data:** information given by completing forms and surveys as well as data about your use of our application systems, including authentication credentials such as usernames or IDs and passwords to log into portals; location data; user display name and identifier; other website or product access information.
- **Computer usage data:** data about your use of (for instance, how, when and where you use and interact with) equipment, electronic communications systems, and property, such as computers, mobile devices, email, instant message, internet, intranet SharePoint sites, shared drives and other data repositories, and voicemail.
- **Market data:** information from market research, any data obtained, and opinions expressed when participating in any surveys.
- **Geographical data:** information about your location e.g. about any working location monitoring for compliance and other purposes.

- **Performance data:** information pertaining to the quality and efficiency of the services you are rendering, against the agreed benchmarks between the Company and the Vendor or yourself (as the case may be) and other similar assessments of performance.
- **Disciplinary data:** information about conduct, disciplinary and grievance investigations, and disciplinary and grievance matters.
- **Absence data:** dates of absence and reasons for absence (such as medical leave) to the extent that these apply to you.
- **Investigation data:** data collected for Wells Fargo investigation process (if used) e.g. due diligence checks, fraud, sanctions and anti-money laundering checks, external intelligence reports, and content and metadata related to relevant exchanges of information among individuals, organizations, including, emails, live chat, video calls, voicemail, etc.
- **Complaints data:** data collected for the processing in relation to any Wells Fargo complaints procedures.
- **Regulatory data:** information we need to support our regulatory obligations.
- **Third-Party data:** the name, title, hiring firm/employer, contact details, and location of any individual whom you are related to or have a close personal relationship with, and who: (i) provided you with a job/personal reference; (ii) is a U.S. or non-U.S. government official; or (iii) has decision-making authority/capability over any matters affecting the Company.
- **Cookies and similar technologies:** data that websites store and access on your computer or mobile device when you visit a website, allowing a website to recognize your visit and collect information about how you use that website The Company use these technologies to recognize you, remember your preferences and tailor the content we provide to you.
- **Sensitive Personal Data:** The Company may also collect certain types of Sensitive Personal Data as permitted and/or required by local law or with your explicit consent, such as health or medical information (e.g. health and sickness records and long-term health conditions), disability status, gender identity, pronouns, sexual orientation, biometric data, trade union membership information, religious beliefs and faiths, and data related to race or ethnicity (collectively, "**Sensitive Personal Data**"). We collect this information for specific purposes, such as health/medical information in order to accommodate a disability or illness and to provide certain working arrangements (such as any flexible working-from-home arrangements), and diversity-related Personal Data (such as race or ethnicity) in order to comply with legal obligations (if any) and internal policies relating to diversity and anti-discrimination. As explained in Section 2, we will only use such sensitive information for those purposes and as permitted by law.

## 2. For what purposes do we use Personal Data and under which lawful bases?

The Company uses Personal Data for the purposes listed below based on one or more of the following lawful bases:

- because we are required to do so by local law;
- because such information is necessary to fulfill the contract;
- because this information is necessary to protect the vital interests of any person;
- because this information is necessary for the performance of a task carried out in the public interest (e.g. for the purpose of preventing or detecting crime or fraud); because you voluntarily provide this information and give your consent for us to process it;

- because we have a specific legitimate interest to process it. In such cases, we have a legitimate interest in processing Personal Data, for example, (i) to ensure that our networks and information are secure; and (ii) to administer and generally conduct business within the Company and across the organization;
- to comply with a legal obligation;
- to establish, utilize and defend our legal rights;
- for insurance purposes.

The Company uses Personal Data to enable you to provide services to us under our engagement with the Vendor, including using and processing the above categories of Personal Data for the following purposes ("**Engagement Purposes**").

- **To maintain and improve effective administration of our engagement with the Vendor**, including assigning projects and tasks, conducting resource analysis and planning, administering project costing and estimates, managing work activities, and administering compliance trainings. The Company may process general data, position/hire work description, organizational data, identification and authentication data, access or system usage data, financial data and payment details, work contact details, contract data, performance data, work-related data, geographical data, qualifications data, third-party data, complaints data, investigation data, regulatory data, absence data and disciplinary data for these purposes. We process such data because such data is necessary to carry out an agreement we have with you; because we have a specific legitimate interest to process it; to comply with a legal obligation; to establish, utilize and defend our legal rights; or, where applicable, you voluntarily provide this information and give your consent for us to process it.
- **To maintain and improve effective administration of the workforce and Company facilities**, including: assigning projects and tasks; making business travel arrangements; managing business expenses and reimbursements; managing and administering vacation time, office time, and (sickness) leave; conducting workforce analysis and planning; administering project costing and estimates; managing work activities; managing transfers; providing performance evaluations; administering learning and development (including approaching you to suggest specific training); providing references as requested (if permitted by Company policy); and providing facilities management and worksite security. The Company may process general data, position/hire work description, organizational data, identification and authentication data, access or system usage data, background or credit check data, visa and work permit data, financial data and payment details, work contact details, emergency contact information, contract data, performance data, absence data, work-related data, geographical data, qualifications data, third-party data, market data, complaints data, regulatory data, investigation data and disciplinary data as well as Sensitive Personal Data for these purposes. We process such data because such data is necessary to carry out an agreement we have with you; because we have a specific legitimate interest to process it; to comply with a legal obligation; to establish, utilize and defend our legal rights; or, where applicable, you voluntarily provide this information and give your consent for us to process it.
- **To comply with other work-related legal requirements**, including confirming someone's right to work or flexible working-from-home arrangements, and verifying identity for security purposes, compensation provision and tax calculations. The Company may process general data, position/hire work description, organizational data, identification and authentication data, access or system usage data, work contact data, financial data and payment details, contract data, work-related data, performance data, absence data, geographical data, qualifications data, third-party data, visa and work permit data for these purposes. We process such data because such data is necessary to carry out an agreement we have with you; because we have a specific legitimate interest to process it ; to comply with a legal obligation; to establish, utilize and defend our legal rights; or, where applicable, you voluntarily provide this information and give your consent for us to process it.
- **To maintain a corporate directory and allow for staff communications**, including populating and making available contact details and/or an intranet website (accessible by Company employees and authorized contingent

resources) to facilitate communication with you or the sharing of information internally. The Company may process general data, work contact details, position/hire work description, organizational data and other data you voluntarily submit such as photographs for these purposes. We process such data because we have a specific legitimate interest to process it.

- **To manage business operations and for contractual and litigation-related purposes**, including initiating or defending claims, performance and service of contracts, maintaining records relating to business activities, budgeting, financial management and reporting, business continuity, communications, managing mergers, acquisitions etc. The Company may process general data, position/hire work description, work contact details, organizational data, contract data, work-related data, third-party data, access or system usage data, computer usage data (including devising and implementing methodologies such as risk ratings), geographical data, complaints data, regulatory data, investigation data and disciplinary data and all other relevant data types for these purposes. We process such data because such data is necessary to carry out an agreement we have with you; because we have a specific legitimate interest to process it; to comply with a legal obligation; or to establish, utilize and defend our legal rights.
- **To maintain information technology ("IT") systems and for any analytical purposes**, including implementing, maintaining, and operating IT and communication systems; providing IT support and asset management; maintaining business continuity and crisis management plans and processes; managing security services and employee access rights; compiling of audit trails and other reporting tools; and identifying patterns, establishing and implementing risk rating tools in the use of technology systems and information entrusted to us to protect Company people, assets and property as well as to comply with any regulatory requirements or demands. The Company may process general data, position/hire work description, work contact details, organizational data, contract data, work-related data, access or system usage data, computer usage data (including devising and implementing methodologies such as risk ratings as well as analyzing or collating platform traffic or content views), geographical data, complaints data, regulatory data, investigation data, disciplinary data and all other relevant data types. We process such data because we have a specific legitimate interest to process it; or, for the performance of a contract (for e.g. enforcement of our terms and conditions of use); or, to comply with a legal obligation; or, where required under applicable local laws, you give your consent for us to process the data (for e.g. where you have consented via the relevant website).
- **To provide performance metrics** to the Vendor (as your employer or agency), including assessment of the quality and quantity of the services provided under our agreement with the Vendor. The Company may process general data, position/hire work description, work contact details, organizational data, contract data, work-related data, identification and authentication data, access or system usage data, computer usage data (including devising and implementing methodologies such as risk ratings), geographical data, performance data, complaints data, regulatory data, investigation data and disciplinary data for these purposes. We process such data because such data is necessary to carry out an agreement we have with you; because we have a specific legitimate interest to process it to comply with a legal obligation; or to establish, utilize and defend our legal rights.
- **To determine your suitability to be engaged** at the time the Vendor assigns you to provide services to Wells Fargo that require access to Wells Fargo's network, or to determine whether you appear on Wells Fargo's "Do Not Rehire" or "Do Not Reengage" lists. The Company may process general data, position/hire work description, work contact details, organizational data, contract data, work-related data, qualifications data, third-party data, identification and authentication data, access or system usage data, computer usage data (including devising and implementing methodologies such as risk ratings), geographical data, performance data, complaints data, regulatory data, investigation data and disciplinary data for these purposes. We process such data because such data is necessary to carry out an agreement we have with you; because we have a specific legitimate interest to process it; to comply

with a legal obligation; to establish, utilize and defend our legal rights; or, where applicable, you voluntarily provide this information and give your consent for us to process it.

- **To monitor, investigate and assure compliance with Wells Fargo's Code of Ethics and Business Conduct, other policies and procedures, and applicable laws**, including Company policies and procedures with regard to monitoring and recording of telephone calls, voicemail, instant message, original and back-up copies of email, video (including CCTV), Internet and other Company resources, and other monitoring activities as permitted by local law; complying with legal and other requirements applicable to our businesses in all countries in which we operate, such as record-keeping and reporting obligations; conducting audits; conducting background checks detecting or preventing possible loss or unauthorized access or processing of customer, employee, confidential or restricted data; protecting Company and other party data and assets, conducting internal investigations, including employee reporting of allegations of wrongdoing, policy violations, fraud, or financial reporting concerns; and complying with internal policies and procedures; handling any potential or other claims; and engaging in disciplinary actions, grievances, and terminations; and if Wells Fargo learns or determines, in its discretion, that you have committed a crime involving theft, fraud or dishonesty, or have committed a violation of Wells Fargo's Code of Conduct or Information Security Policies, to place your Personal Data on Wells Fargo's "Do Not Rehire" or "Do Not Reengage" lists. The Company may process general data, position/hire work description, work contact details, organizational data, contract data, work-related data, access or system usage data, computer usage data (including devising and implementing methodologies such as risk ratings), geographical data, absence data, identification and authentication data, background or credit check data, third-party data, Sensitive Personal Data, performance data, complaints data, regulatory data, investigation data, disciplinary data and all other relevant data as needed for these purposes. We process such data because we have a specific legitimate interest to process it; or, for the performance of contract; or, to comply with a legal obligation; or, to establish, utilize and defend our legal rights; or, where required under applicable local laws, you give your consent for us to process the data.
- **To respond to requests and legal demands from courts, regulators or other authorities**, including complying with inspections and other requests from regulators or other authorities in your home country or other jurisdictions, such as attachment of earnings orders, and participating in and responding to legal process including domestic and cross-border litigation, subpoenas pursuing legal rights and remedies, defending litigation, and managing any internal complaints or claims and discovery procedures (including legal proceedings which may occur outside your jurisdiction of residence). The Company may process general data, position/hire work description, work contact details, organizational data, contract data, work-related data, access or system usage data, computer usage data (including devising and implementing methodologies such as risk ratings), geographical data, absence data, identification and authentication data, background or credit check data, third-party data, Sensitive Personal Data, performance data, complaints data, regulatory data, investigation data, disciplinary data and all other relevant data as needed for these purposes. We process such data because such data is necessary to carry out an agreement we have with you; because we have a specific legitimate interest to process it; to comply with a legal obligation; or to establish, utilize and defend our legal rights.
- **To respond to emergencies, including contacting you or your family or emergency contacts in the event of any emergencies**, protecting the health and security/safety of staff and others, and protecting office equipment, facilities, assets and other property. The Company may process general data, work contact details, emergency contact information, organizational data and other data you voluntarily submit for these purposes. We process such data because we have a specific legitimate interest to process it.
- **To manage and maintain programs applicable to remote access or mobility**, including ensuring compliance of any privately-owned equipment (e.g., mobile phones, laptops, tablets, and similar/hybrid devices) with and to the extent these are subject to policies applicable to remote access or mobility or the Corporate Participant Agreement (where applicable) and other relevant internal policies (such as those related to monitoring, as outlined

below), as applicable to you. Review these policies for additional details about the program. Processing subject to these policies includes the overall management of the program and lifecycle of applicable devices; verification of your compliance with applicable policies; maintenance of applicable systems/on-device infrastructure; reimbursement management, if applicable; providing remote and in-person (where necessary) maintenance, support and security intervention; verification of device compatibility and security requirements in line with applicable internal policies (e.g., using mobile device management solutions to verify access to Company networks/systems through the applicable device); location verification (e.g., country check for security purposes); and other processing required for compliance with any additional regulatory requirements. The Company may process general data, position or work description, identification and authentication data, financial data and payment details, work contact details, contract data, organizational data, access or system usage data, computer usage data, geographical data, investigation data, complaints data, regulatory data, and all other relevant data as needed. We process such data because we have a specific legitimate interest to process it; or, where required under applicable local laws, you give your consent for us to process the data.

- **To perform certain limited activities with respect to Sensitive Personal Data**, as required or permitted under local law, such as calculating the number of sick or absence days, reporting workplace accidents, complying with obligations to make reasonable adjustments for any disabilities or health issues as well as confirming someone's right to work, and verifying identity for security purposes. The Company may process general data and Sensitive Personal Data for these purposes. We process such data in order to comply with a legal obligation; or, where applicable, you voluntarily provide this information and give your consent for us to process it.
- **To carry out diversity monitoring which usually includes Sensitive Personal Data**, as permitted by local law or with your explicit consent. This includes monitoring equal opportunities such as reviewing our interviewing and hiring processes, running reports to understand the seniority of staff, and our existing staff population. The Company may process general data, position or employment/work description data, financial data, organization data and Sensitive Personal Data. We process such Sensitive Personal Data usually on the basis of your explicit consent unless local law permits us to collect and use this data for this purpose. Please note that when we obtain your consent to use your Sensitive Personal Data, you can choose not to provide your consent. You will not experience any detriment should you choose not to consent. We otherwise rely on our legitimate interests to process this data for this purpose since we wish to understand the diversity of our workforce and promote a more diverse workforce.

### 3. To whom do we disclose Personal Data?

Wells Fargo operates across the globe, and we may transfer Personal Data for hiring purposes to Wells Fargo entities located outside of the UK, the EU and/or DIFC. Cross-border transfers can also occur when we engage third parties to assist us with certain operations and activities if established in different countries, including countries located outside of the UK, the EU and DIFC.

The countries where we have operations are shown on this map at <https://www.wellsfargo.com/cib/global-services/locations/>. We may also transfer Personal Data to other countries where our third-party service providers are located.

Disclosure of and access to Personal Data within the Company will be limited to those who need to know the information for hiring purposes and will include your managers and their designees, and personnel in HR, IT, Compliance, Legal, Finance and Accounting, and Internal Audit.

All personnel within the Company will generally have access to your business contact information such as name, position, telephone number, postal address, and email address.

The Company may transfer Personal Data for Engagement Purposes to the following recipients:

- **Wells Fargo U.S.** Since management, human resources, legal and audit responsibility partially rests with Wells Fargo & Company as the group parent in the United States ("**Wells Fargo & Company**") and with Wells Fargo Bank, N.A. operations in the U.S. ("**Wells Fargo Bank, N.A.**") (collectively, "**Wells Fargo U.S.**"), the Company may make Personal Data available to, or otherwise allow access to such data by, Wells Fargo U.S., which may process the data for the following purposes: maintaining and improving effective administration of the workforce; maintaining a corporate directory; maintaining IT systems; monitoring, investigating and assuring compliance with Wells Fargo's Code of Ethics and Business Conduct, other policies and procedures, and applicable laws; managing and maintaining the applicable programs in relation to remote access and mobility; and responding to requests and legal demands from regulators and other authorities, including such authorities in the United States. In certain circumstances, Wells Fargo & Company or Wells Fargo Bank, N.A. may be acting as an independent controller of processing of your Personal Data. If you have any questions, please contact our EMEA Regional Privacy Officer, using the contact information in Section 10.
- **Affiliated Entities.** To the extent that your management or human resources responsibility for managing your engagement partially rests with different Affiliated Entities, the Company may also make Personal Data available to, or otherwise allow access to such data by, relevant Affiliated Entities, which may process the data for the following purposes: maintaining and improving effective administration of the workforce; maintaining a corporate directory; maintaining IT systems; monitoring, investigating and assuring compliance with Wells Fargo's Code of Ethics and Business Conduct, other policies and procedures, and applicable laws; managing and maintaining the applicable programs in relation to remote access and mobility; and responding to requests and legal demands from regulators and other authorities, including authorities in the jurisdictions where the Affiliated Entities are located. If you have any questions, please contact our EMEA Regional Privacy Officer using the contact information in Section 10.
- **Customers and prospects.** As necessary and in connection with the Engagement Purposes, Personal Data may be transferred to customers and other third parties as permitted by applicable law.
- **Regulators, public and governmental authorities.** As necessary and in connection with the Engagement Purposes described above, Personal Data may be transferred to regulators, courts, other authorities (e.g. tax and law enforcement authorities), including authorities outside your country of residence.
- **Service providers.** As necessary and in connection with the Engagement Purposes described above, Personal Data may be shared with one or more parties, whether affiliated or unaffiliated, to process Personal Data under appropriate instructions ("**Data Processors**"). Such Data Processors may carry out instructions related to IT system support, training, compliance, monitoring and other activities, and will be subject to contractual obligations to implement appropriate technical and organizational security measures to safeguard Personal Data and to process Personal Data only as instructed.
- **Professional Advisors.** This category includes accountants, auditors, lawyers, insurers, bankers, and other outside professional advisors in all of the countries where we operate. As necessary and in connection with the Engagement Purposes described above, Personal Data may be shared with one or more professional advisors.

**Transferring your data cross-border:** We may need to transfer your information in this way for a variety of purposes such as to carry out our contract with you, to fulfil our legal obligation, to protect the public interest, and/or for our legitimate interests. The recipients of Personal Data identified in this Section may be located in the United States and other jurisdictions. Some of these countries are recognized by the EU or the UK or the DIFC respectively as providing an adequate level of protection according to each of their respective standards (for instance, the full list of these countries recognized under EU law is available at [https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://commission.europa.eu/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en)). With regard to transfers from the EU, the UK or the DIFC to countries not considered adequate by the relevant Data Protection Authority, we have put in place safeguards and adequate measures to protect Personal Data, such as standard contractual clauses as adopted by the EU, the UK or the DIFC respectively. Please contact



our EMEA Regional Privacy Officer, using the contact information in Section 10, to obtain a copy of these safeguards and measures.

## 4. From which other sources do we receive Personal Data?

In addition to Personal Data that we receive directly or indirectly from you, we may receive your Personal Data from certain other sources. These may include:

- Colleagues;
- Managers;
- Prior employers or schools;
- Clients;
- The Vendor;
- Government databases;
- Credit reference agencies;
- Criminal records agencies; and
- Background check vendors.

We may conduct enhanced background checks for specific high-risk roles within Wells Fargo and these roles will be identified as such. This will be carried out during recruitment and periodically throughout your service contract, in line with Wells Fargo policies and procedures.

## 5. How long do we retain Personal Data?

We retain Personal Data for as long as needed or permitted in light of the purpose(s) for which the data were obtained and consistent with applicable law. The criteria used to determine our retention periods include, but are not limited to:

- The length of time we have an ongoing engagement with you;
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your activities for a certain period of time after the engagement has ended);
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations); and/or
- Whether our operational needs require maintaining your personal data (for example, for the internal audit of bank operations, maintaining solicitation preferences (including for former customers and non-customers), systems administration, or for fraud prevention).

## 6. What security measures do we implement?

The Company has implemented appropriate technical, physical and organizational security measures to safeguard Personal Data in accordance with Wells Fargo's Information Security Policy Standards. Please bear in mind that if, as a result of your engagement, you have access to Personal Data of the Company or Personal Data of any of its controlling or Affiliated Entities, its clients and/or Data Processors, or any third parties, you are obliged to maintain the confidentiality of such Personal Data. In addition, you are prohibited from sharing such Personal Data with third parties without authorization of the Company or the individuals. This obligation continues even after the termination of your engagement with us.

## 7. What are your rights in relation to Personal Data?

### What are your rights?

You have the right to request to access, rectify, erase, or restrict processing of Personal Data, or request to receive a copy of your Personal Data for purposes of transmitting it to another company (to the extent these rights are provided to you by applicable law). To exercise these rights, contact our EMEA Regional Privacy Officer using the information in Section 10. We will respond to your request consistent with applicable law.

### How can you revoke consent to our processing of your Personal Data?

To the extent that consent is required by applicable law, we will seek your consent.

You may revoke your consent at any time by notifying the EMEA Regional Privacy Officer using the contact details in Section 10. Prior uses and disclosures of Personal Data, however, will not be affected by the withdrawal of consent (unless required by applicable law), and we may continue to process Personal Data as permitted or required by law.

### How can you object to automated decision-making and/or profiling?

You may object to the use of your personal data for the purposes of automated decision-making and/or profiling by contacting the EMEA Regional Privacy Officer using the contact information in Section 10. automated decision-making and/or profiling?

You may object to the use of your personal data for the purposes of automated decision-making and/or profiling, by contacting the EMEA Regional Privacy Officer using the contact information in Section 10.

### How can you stop Wells Fargo from sending you marketing materials?

We will only send you marketing and sales materials where, and to the extent required by applicable law, you have consented to receive such materials. If you do not want to receive our marketing and sales materials by direct mail, telephone or email, please follow the unsubscribe or opt-out instructions provided in those communications or submit a written request to the EMEA Regional Privacy Officer using the address shown below. You can also contact our EMEA Regional Privacy Officer to exercise your right to object to the receipt of these communications. We will comply with any such request within a reasonable period after receipt.

In addition to our EMEA Regional Privacy Officer listed in Section 10, the Company has appointed a contact person ("Contact Person") to respond to your questions and complaints. The Contact Person is generally the Human Resources Manager at the Company or, if there is no Human Resources Manager, the Branch Manager or Country Manager for that location.

You also may lodge a complaint with a Data Protection Authority for your country or region or in the place of the alleged misconduct. Contact information for the relevant Data Protection Authority may be found by clicking on link(s) below:

United Kingdom	<a href="#">Information Commissioner's Office (ICO)</a>
European Union	<a href="#">Our Members   European Data Protection Board (europa.eu)</a>
DIFC	<a href="#">Data Protection   DIFC</a>

## 8. Under what circumstances are equipment, electronic communication systems, and property subject to monitoring?

To the extent permitted by local law, and subject to any other local notices or policies, the Company reserves the right to monitor the use of equipment, electronic communication systems, and property, including original and backup copies of email, instant messaging, text messaging, voicemail, internet use, computer use activity, and CCTV. For more information, please visit the Code of Ethics and Business Conduct

[https://hop.wf.com/ethics\\_ee\\_bestbet02](https://hop.wf.com/ethics_ee_bestbet02)[https://hop.wf.com/ethics\\_ee\\_bestbet02](https://hop.wf.com/ethics_ee_bestbet02), Wells Fargo's Information Security Policy ([https://hop.wellsfargo.com/ent\\_bb\\_0005](https://hop.wellsfargo.com/ent_bb_0005)[https://hop.wellsfargo.com/ent\\_bb\\_0005](https://hop.wellsfargo.com/ent_bb_0005)) and other policies applicable to

remote access or mobility, any applicable Corporate Participant Agreement and consult the agreement between the Company and the firm with which you contracted or for which you otherwise work.

In addition, the Company may engage in such activities to administer IT access, provide IT support, manage security services and access control authorizations, as well as to monitor and assure compliance with Wells Fargo's Code of Ethics and Business Conduct and other Company policies and procedures and disciplinary or grievance investigations. To the extent permitted by applicable law, you may not expect privacy in connection with your use of any equipment, systems, or property, including personally owned equipment to the extent subject to applicable policies in relation to remote access or mobility, as referenced above, which you should review if you use an approved device. Even if you create or have access to passwords to protect against unauthorized access to correspondence and activities, using that password does not make the related communications or activities private. In addition, to the extent permitted by local law, phone calls made or received on any business telephone may be monitored or recorded for legal, regulatory and compliance purposes and/or internal investigations. Monitoring may be conducted remotely or locally, and related Personal Data collected and processed by, the Company, Wells Fargo & Company, Affiliated Entities, and/or Data Processors using software, hardware or other means. Personal Data obtained through monitoring may be transferred to regulators and other authorities, as well as the Wells Fargo & Company Board of Directors, and other recipients as necessary for the Engagement Purposes described above, including recipients in your home country or other jurisdictions. Personal Data obtained through monitoring, which is relevant to the Engagement Purposes described above, will be retained for reasonable periods to accomplish these purposes, and subject to any rights non-employees may have under applicable law.

When carrying out monitoring of use of our equipment or systems, the Company implements appropriate measures to protect against abuse of use of any such Personal Data that is processed in connection with such monitoring such as training and supervision of staff and periodic review of procedures and programs.

Our websites, apps and other digital products may also track and record your interactions with them to help:

- Provide or improve services and features;
- Keep you safe;
- Keep our services secure;
- Make your visit more personal; or
- Support our marketing.

Some tracking is essential but other tracking is optional.

For more details, please refer to: [Wells Fargo Privacy Security Cookies panel](#)

## 9. How do we update this Notice?

We may change or update parts of this Notice to reflect changes in our practices and/or applicable law and regulation. Please check this Notice from time to time so that you are aware of any changes or updates to it, which may be indicated by a change in the effective date noted at the beginning of the Notice. If and when required under applicable law, we will notify you of any change or update in relation to this Notice by either individual message or disclosing the changes to the data processing on an available medium.

## 10. Who do you contact for questions on your Personal Data?

The Company has Regional Privacy Officers who are dedicated to responding to requests in relation to your Personal Data. Please contact our EMEA Regional Privacy Officer using the contact information below:

EMEA Regional Privacy Officer  
Address: 33 King William Street  
London, United Kingdom  
EC4R 9AT  
Telephone: +44 (0) 203-942-8000  
Email: [privacy.emea@wellsfargo.com](mailto:privacy.emea@wellsfargo.com)

## 11. What Wells Fargo entities operate in Europe?

A list of entities that Wells Fargo operates in Europe can be found below:

Name of Wells Fargo Legal Entity	Jurisdiction
Wells Fargo Bank, National Association, London Branch	United Kingdom
Wells Fargo Securities International Limited	United Kingdom
Wells Capital Finance (UK) Limited	United Kingdom
Wells Fargo Bank International Unlimited Company	Ireland
Wells Fargo Bank International Unlimited Company, Frankfurt Branch and the Duesseldorf Office	Germany
Wells Fargo International Finance (France) S.A.S.	France
Wells Fargo Securities Europe S.A.	France
Wells Fargo Capital Finance, Amsterdam Branch	The Netherlands
Wells Fargo Capital Finance, Stockholm Branch	Sweden
Wells Fargo Bank, National Association, DIFC Branch	Dubai, United Arab Emirates