

# Hilltop Holdings Global Employee Privacy Policy

Effective Date: January 1, 2023

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## Introduction

This Hilltop Holdings Global Employee Privacy Policy (this “**Privacy Policy**”) aims to provide you with a better understanding of what [Personal Information](#) we collect, use, share, and otherwise process about you as an [Employee](#).

As used in the Privacy Policy, the words “**our**,” “**us**,” “**we**,” and “**Hilltop**” refers to Hilltop Holdings Inc. and its subsidiaries.

The word “**Employee**” or “**you**” refers to all directors, officers, and other employees and ex-employees of Hilltop.

The word “including” means “including but not limited to.”

## What this Privacy Policy Covers

This Privacy Policy covers your Personal Information when it is collected by Hilltop during your employment with Hilltop and post-employment. This Privacy Policy should be read in conjunction with our other corporate notices, policies, and procedures, including those regarding your use of our information technology (“IT”) and communications systems and networks. When appropriate, we will provide you with a supplemental privacy notice, a notice of collection, or a “just in time” notice to cover any additional privacy matters not mentioned in this document.

# Collection of Personal Information

## What is Personal Information?

**“Personal Information”** means any data or information, in any form or medium, that on its own or when combined with other data could identify a particular individual, or otherwise any other data or information that constitutes “personal information” as that term is defined under applicable law.

## How do we get your Personal Information?

We may collect Personal Information about you in several ways, including:

- Directly from you or your agents. For example, from documents or information, you provide to us or from an employment agency or recruiter.
- Indirectly from you or your agents. For example, through information we collect from you or your agents in the course of administering our relationship with you as an Employee, including from background check providers, occupational health and other health providers, pension administrators, and other providers of Employee benefits.
- Directly or indirectly from your activities on our IT and communications systems and networks when you engage with them as an Employee.
- From third parties that interact with us in connection with the services we perform.
- From our affiliates and subsidiaries.
- From third-party data aggregators.
- From CCTV images or security images and/or video from our landlords or taken using our own systems.

## What Personal information do we collect and why?

We may collect the following categories of personal information from you:

### ***Information related to your employment:***

- Personal contact details, such as your name, postal address, contact telephone numbers (landline and mobile), and personal email addresses.
- Your date of birth, gender, and social security number.
- A copy of your passport, driver’s license, or similar photographic identification and/or proof of address documents.
- A copy of your signature.
- Marital status.
- Next of kin, emergency contacts, and their contact information.
- Employment and education history, including your qualifications, job application, employment references, right-to-work information, and details of any criminal convictions you declare.
- Location of employment.
- Details of any secondary employment.
- Security clearance details including basic background checks and higher security clearance details according to your job.

- Your responses to staff surveys if this data is not anonymized.
- Any content featuring you produced for use on our website or social media, which may include as videos, authored articles, blog posts, and speech transcripts.

***Information related to your compensation and benefits:***

- Information about your job role including; your start and leave dates, salary (including grade and salary band), any changes to your employment contract, and working pattern (including any requests for flexible working).
- Details of your time spent working, and any overtime, expenses, or other payments claimed.
- Details of any leave, including sick leave, holidays, special leave, etc.
- Your financial details, which may include your bank account number, payroll records, and tax status information.
- Details relating to parental leave and pay.

***Information relating to your performance and training:***

- Information relating to your performance at work, for example, probation reviews and promotions.
- Information relating to work matters and investigations to which you may be a party or witness.
- Disciplinary records and documentation related to any investigations, hearings, and warnings/penalties issued.
- Whistleblowing concerns raised by you, or to which you may be a party or witness.
- Information related to your training history and development needs.

***Information relating to our IT and communications systems and networks and monitoring:***

- Information related to your access to our IT and communications systems and networks, which may include your personal cellular telephone information, login(s) and password(s).
- Information about your activity on our IT and communications systems and networks, which may include internet traffic, browsing history, search history, website filtering, email communications, keystrokes, or systems and/or data accessed.
- Information about your activity in your role as an Employee, which may include video recordings (such as recorded Teams meetings) and audio recordings (such as a voicemail recording).
- Information derived from monitoring IT acceptable use policies.
- Photos, images, video and other tracking or monitoring related to security.

***Information relating to your health and well-being:***

- Health and well-being information either declared by you or obtained from health exams, eye examinations, occupational health referrals and reports, sick leave forms, health management questionnaires, or fit notes, i.e., Statement of Fitness for Work from your GP or hospital.
- Accident records if you have an accident at work.
- Details of any desk audits, access needs, or reasonable adjustments.
- Information you have provided regarding equal opportunities monitoring. This may include information related to racial or ethnic origin, religious beliefs, disability status, military status, marital status, and gender identification and may be extended to include other protected characteristics.

- Any information you provide to our equality and diversity networks, for example, Diversity Momentum and Women’s Momentum.
- Any information you choose to share with us – which may include hobbies, social preferences, etc.

## Use of Personal Information

Hilltop uses the Personal Information that we collect primarily for the purposes of operating, managing, and maintaining our business, administering our relationship with you, and accomplishing our business purposes and objectives. Such uses may include:

- Determining eligibility for hiring, including the verification of references and qualifications and, where permitted by law, administering background checks;
- Providing you access to the business services required for your role as an Employee;
- Managing our human resources processes, including administering payroll and benefits as well as processing Employee work-related claims (e.g., worker compensation, insurance claims, etc.), leave of absence requests, perquisites, reimbursements, and other benefits, such as holiday or parental leave;
- Training and evaluation of Employees and determining training and evaluation requirements;
- Conducting pay reviews;
- Reviewing work performance and determining performance requirements;
- Assessing compliance with corporate policies and procedures;
- Protecting confidential information, intellectual property, and other business interests;
- Investigating breaches of Hilltop policies and procedures, IT and communications systems and networks, or other unlawful or improper acts;
- Ensuring the security of our premises, IT and communications systems and networks, Employees, and customers;
- Ensuring the health, safety, and well-being of our Employees.
- Dealing with any employer / Employee-related disputes;
- Taking disciplinary actions or termination;
- Establishing emergency contacts and responding to emergencies;
- Complying with laws and regulations (e.g., labor and employment laws, health and safety, tax, anti-discrimination laws, etc.) under judicial authorization or to exercise, protect or defend legal rights, safety, property of Hilltop or any third party, or to prevent or stop any illegal, unethical, or legally actionable activity;
- Compiling internal directories, such as Employee directories;
- Detecting, investigating, and prosecuting fraud, security incidents, or other types of wrongdoing;
- IT security and administration, network security or support;
- Service and process improvement;
- Other legitimate purposes reasonably required for day-to-day operations, such as accounting, financial reporting, business planning; and
- Other legitimate purposes as permitted by applicable law.

## Sharing of Personal Information

We may also share your Personal Information with the following parties as described below:

- Our subsidiaries and affiliates;
- Our vendors, service providers, contractors, attorneys, advisors, and others that provide services to us, such as website hosting, data analytics, marketing, information technology and related infrastructure, legal, audit and accounting services, training, data storage and management, benefits, and payroll.
- Governmental entities, such as law enforcement and other public authorities, in response to lawful requests or court orders when we believe we are compelled by any applicable law, regulation, legal process, or government authority;
- Potential buyers (and their representatives, agents, and advisers) in connection with any proposed purchase, merger, acquisition, reorganization, or another similar event of any part of our business, provided that we inform the buyer it must use your Personal Information only for the purposes disclosed in this Privacy Policy;
- Where necessary to exercise, establish or defend legal rights, including to enforce our agreements and policies, protect Hilltop, our rights or property, our customers, or the public from harm or illegal activities, or respond to an emergency;
- With your consent.

## Security and Confidentiality

At Hilltop, we have put in place physical, operational, and technical safeguards designed to protect your Personal Information from accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. We use technical and organizational security measures designed to protect the security of your Personal Information both online and offline, including the implementation of access controls, firewalls, network intrusion detection, and the use of anti-virus software. Please note that no system is entirely secure. So, while we strive to protect your data, we cannot guarantee or warrant the security of your Personal Information.

***All Personal Information will be treated as confidential. All non-business-related access and/or disclosures by Employees are prohibited. A duty of confidentiality binds all Employees who have access to Personal Information.***

## Data Retention

We will keep your Personal Information for as long as needed to carry out the purposes described above or as otherwise required by law. Generally, this means we will keep your Personal Information until the end of your employment with us, plus a reasonable period of time after that, where necessary, to respond to any employment inquiries, deal with legal, tax, accounting, or administrative matters, or to provide you

with ongoing benefits. For additional details, please see the Record Retention Policy, as periodically updated.

## Your Rights

As an Employee, you have several rights to your Personal Information. Below is an explanation of your rights. To exercise any of the rights described in this section, please use the self-help functions available to you and otherwise submit your request by email to [hilltophr@hilltop-holdings.com](mailto:hilltophr@hilltop-holdings.com).

### How Do I Update/Correct my Personal Information?

It is important that the information contained in our records be both accurate and current. We offer various self-help functions within our employment tools (such as ExponentHR) that will allow you to update certain of your Personal Information in our records. If your Personal Information changes during your employment, please use these self-help tools to update that data, where available, or let your manager know of those changes by emailing them.

### How Can I Request Access to My Personal Information?

Several of Hilltop's self-service tools allow you to see and/or update the Personal Information that we hold. If we have Personal Information that you cannot access via these self-service systems, then you may request it by emailing [hilltophr@hilltop-holdings.com](mailto:hilltophr@hilltop-holdings.com). We may ask you for information to verify your identity and evaluate your right to access the Personal Information requested. You can also ask that we delete Personal Information that you believe is inaccurate or no longer relevant in this same way. We may refuse access to or deletion of personal information in some instances, such as when providing access might infringe on someone else's privacy rights or impact our legal or regulatory obligations.

### What Additional Rights do I have?

In addition to being able to update, correct, and access your Personal Information, you may also have other data protection rights depending on where you reside. We will provide you with a supplemental notice of those rights if you live in a jurisdiction that recognizes them.

## Privacy Policy Changes

From time to time, we make updates or changes to this Privacy Policy because of changes in applicable laws or regulations or because of changes in our Personal Information practices. Where consent is necessary to make a change apply to our practices concerning your Personal Information, we will not apply the changes to your Personal Information until we have that consent.

You can see when this Privacy Policy was last updated by checking the date at the top of this Privacy Policy.

## Questions or Concerns

If you have questions or concerns about our use of your Personal Information, you may raise them directly with your manager or by email to [hilltophr@hilltop-holdings.com](mailto:hilltophr@hilltop-holdings.com).