

## CAPITAL ONE NON-US APPLICANT PRIVACY NOTICE

*Effective: 1/1/2026*

Capital One Financial Corporation and its affiliates (collectively, “**Capital One**,” “**we**,” “**us**,” or “**our**”) are committed to protecting your personal information. This Capital One Non-US Applicant Privacy Notice (“**Notice**”) explains how we collect, use, transfer, and disclose personal information when you apply for certain roles located outside of the United States.

### What this notice covers

This Notice applies to personal information collected from current and former applicants for roles at certain Capital One entities that make this notice available to you, including entities with the Capital One, Discover, and Velocity Mobile names. You can find more information about the affiliates covered by this Notice in the [Appendix](#) at the end of this Notice.

This Notice does not apply when you apply for a role at Capital One affiliates or branches that provide separate privacy notices to their applicants, such as Capital One (Europe) plc or Capital One (Canada Branch). It also does not apply when you apply for a role in the United States.

For more information about how we collect, use and disclose personal information in other contexts, please visit [capitalone.com/privacy](https://capitalone.com/privacy).

### What information about you we collect, use, transfer, and disclose, and why

In the course of reviewing your application for a role at Capital One, we collect information about you that you provide to us or that we obtain from third parties. We refer to such information as “Personal Information.” The Personal Information that we process will vary based on the role you are applying for and the Capital One entity for which you are applying for a role. For more specific information regarding what Personal Information Capital One may collect, use, transfer, or disclose, and the purposes for which it is collected, used, transferred, or disclosed, please see the [Appendix](#) at the end of this Notice.

Providing Personal Information to us through one of our career sites (“the Careers Site”) is voluntary. However, if you do not provide sufficient information, we may be unable to consider your employment application or, if you are hired, your subsequent promotion, transfer, or relocation. To the extent that you decide to provide or make available Personal Information that is not required for the purposes as described in the end of this Notice, your decision to provide Personal Information is voluntary. If we process Personal Information based on your consent you may withdraw your consent at any time.

As discussed in the [Diversity](#) section below, in certain cases we will ask questions about race/ethnic origin, gender, and disability of our applicants, for equal opportunity monitoring. We can also inquire about criminal records. We will ask such questions only where permitted by applicable law. We ask that you avoid submitting information that may qualify as sensitive information under applicable law, except where such information is legally required or explicitly requested by us. Where required by law, we will request your consent before we process any Personal Information considered sensitive under applicable laws, such as race/ethnic origin, gender, disability, criminal records, or health/medical information.

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We may use automated systems to assist us in analyzing and reviewing your application depending on your role and jurisdiction. Please note that the use of such tools is only one component of our hiring process and a human will always be involved in reviewing your application. Where provided by applicable law, you may request to opt-out of the use of such automated tools by contacting us using the details set out below in the [Your rights, questions, and complaints](#) section of this Notice.

The Personal Information that you submit on the Careers Site or that you provide to us will be used for Capital One's global personnel recruitment, management, and planning purposes, as permitted by applicable law. For more detail regarding the reasons and purposes for which we process Personal Information, please see the [Appendix](#) at the end of this Notice.

If we hire you, Personal Information we collect in connection with your application can be incorporated into our human resources system and used to manage the new-hire process; any such information can become part of your employment records with us and used for other employment-related purposes.

Personal Information about you will be added to Capital One's candidate database and can be retained and used to consider you for opportunities at Capital One other than the one(s) for which you apply. If you do not wish us to do this, please contact us using the details set out below in the [Your rights, questions, and complaints](#) section of this Notice.

We collect most Personal Information from you directly. Any information you submit through the Careers Site must be true, complete, and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process or disciplinary action including immediate termination of employment. In addition, it is your responsibility to ensure that information you submit does not violate any third party's rights. We may also receive Personal Information about you from other sources.

If you provide us with Personal Information of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us. See the [Appendix](#) at the end of this Notice for more information.

### Data integrity and retention

Capital One will take reasonable steps to ensure that the Personal Information processed is reliable for its intended use, and is accurate and complete for carrying out the purposes described in this Notice.

The Personal Information we collect will be retained for as long as reasonably necessary for the purposes set out in this Notice, consistent with our retention policies, and in accordance with applicable laws. When determining these retention policies, we take into account the length of time Personal Information is required to be retained to provide or receive the services (e.g., the duration of the application process and period in which we have an ongoing relationship with you); satisfy legal and compliance obligations and for audit purposes; address any complaints or troubleshoot issues related to the job application process or other services; and defend or bring potential legal claims or enforce our policies.

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We may remove Personal Information for inactive Careers Site accounts from our database, subject to any applicable legal or regulatory obligations. Capital One can delete Personal Information about you (including your CV/résumé) from our database at any time and for any reason. Therefore, please retain your own copy of the Personal Information provided to us.

### How we share your personal information

Due to the global nature of Capital One operations, we disclose Personal Information to personnel and departments throughout Capital One to fulfill the purposes set out in the [Appendix](#) at the end of this Notice. This may include transferring Personal Information to other countries, provinces, or regions. Our Capital One subsidiaries or affiliates, including affiliates in the United States, may process your Personal Information for certain purposes.

Access to Personal Information within Capital One will be limited to those who have a need to know the information for the purposes described in this Notice, and may include individuals in Human Resources (HR), Information Technology (IT), Compliance, Legal, Finance and Accounting, and Internal Audit.

From time to time, Capital One will need to make Personal Information available to other unaffiliated third parties. Some of these unaffiliated third parties may be located outside of your home jurisdiction, including in the United States, the United Kingdom (UK), Canada, Mexico, India, the Philippines, Singapore, or any other country, province, or region in which we or they have operations. These jurisdictions may have data protection rules that are different from those of your country, province, or region. In all such cases, and generally for any processing operations, we take appropriate security measures to protect your Personal Information in accordance with this Notice. In certain circumstances, courts, law enforcement agencies, regulatory agencies, or security authorities in those other countries, provinces, or regions may be entitled to access your Personal Information. For more specific information about how we share Personal Information about you with unaffiliated third parties, please see the [Appendix](#) at the end of this Notice.

Capital One may need to transfer Personal Information to our subsidiaries, affiliates, or unaffiliated third parties in countries that have not been recognized as providing an adequate level of protection of Personal Information by certain jurisdictions. For transfers from the European Economic Area (EEA), the UK, the Dubai International Finance Centre (DIFC) in the United Arab Emirates, and Japan to countries not considered adequate by the European Commission, the UK government, the DIFC, and Japan respectively, we put in place adequate measures, such as standard contractual clauses, to protect your Personal Information. The list of countries recognized by the EEA, the United Kingdom, the DIFC, and Japan as providing an adequate level of protection according to EEA, UK, DIFC, and Japanese standards respectively is available [here](#) for the EEA, [here](#) for the UK, [here](#) for the DIFC, and [here](#) for Japan.

You may obtain a copy of these measures by contacting us using the details set out below in the [Your rights, questions, and complaints](#) section of this Notice.

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### Security and internal policies

We limit access to your Personal Information to those associates, agents, contractors, and other third parties who have a business need to know. We have an information security program that includes administrative, technical, and physical measures that are designed to protect information within Capital One. While we strive to protect information about you, no method of data transmission or storage is 100% secure, and we cannot ensure or warrant the security of such information.

Capital One also maintains internal procedures and policies regarding our processing of Personal Information to facilitate compliance with this Notice and applicable laws, including with respect to retention, access, and the security of Personal Information. For more information about the procedures and policies that Capital One has in place, please contact us using the details set out below in the [Appendix](#).

### Your rights, questions, and complaints

If you register on the Careers Site, you may access, review, and change your Personal Information stored therein by logging into the Careers Site and updating your account information. The updated profile will be used as the default the next time you apply for a job using your account online. To change Personal Information that you have already submitted for consideration for a specific position, please update your profile and resubmit your application for that position. We encourage you to promptly update your Personal Information if it changes or is inaccurate.

You may have additional rights under applicable privacy laws depending on the jurisdiction in which you reside. For example, to the extent that relevant rights are provided to you by applicable law, you may have rights to access, correct, update, suppress, restrict, or delete Personal Information, object to or opt out of the processing of Personal Information, withdraw your consent (which will not affect the lawfulness of processing prior to the withdrawal), issue a complaint about our processing of your Personal Information, receive a copy of your Personal Information for purposes of transmitting it to another company, and exercise any other rights provided under applicable law.

Please contact the appropriate data protection contact listed below if you have any questions about how Capital One uses Personal Information or if you would like to request to exercise your rights where available under applicable law:

- Velocity Mobile applicants: [askhreurope@capitalone.com](mailto:askhreurope@capitalone.com)
- Capital One Mexico applicants: [mexicohr@capitalone.com](mailto:mexicohr@capitalone.com)
- All other applicants covered by this Notice: [WorkforcePrivacy@capitalone.com](mailto:WorkforcePrivacy@capitalone.com)

We will respond to your request consistent with applicable law. Please note, however, that certain Personal Information may be exempt from requests pursuant to applicable data protection laws or other laws and regulations. Importantly, available privacy rights vary by jurisdiction and applicable law, and the above rights are not available in all jurisdictions. In

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some jurisdictions, you may lodge a complaint with a data protection authority for your country, province or region (see the [Appendix](#) at the end of this Notice for contact details).

### Diversity

Capital One is an equal opportunity employer, which means we offer equal treatment to all applicants, consistent with applicable law. Capital One does not unlawfully discriminate, either directly or indirectly, based on characteristics protected by applicable law, such as: race, color, sex, gender identity, sexual orientation, nationality, national origin, ethnic origin, religion, beliefs or creed, age, disability, marital status, veteran status, or genetic information in any area of recruitment.

### Law applicable to job application

Any Personal Information you submit to the Careers Site will be collected in the United States and will be subject to U.S. laws.

If we share your Personal Information with an affiliate located in another country, province, or region in its capacity as a potential employer, the affiliate will handle your Personal Information in accordance with this Notice. Any hiring or other employment-related decisions will be made by the hiring affiliate in accordance with the laws of the country, province, or region where the job will be located.

### About children

The Careers Site is not intended for minors under the age of 18.

### Links to third-party websites

This Policy does not apply to the websites, mobile applications, or other online services of non-Capital One companies or any third-party websites that we link to online. Please review the privacy policies of other websites and services you visit to understand their privacy practices.

### Passive information collection: cookies and similar technology

We and our service providers use “cookies” and similar technologies on the Careers Site. The Careers Site for your home jurisdiction will contain more information about these cookies and similar technologies and, where applicable, how to adjust your settings related to these cookies and similar technologies.

### Current personnel of Capital One

If you currently work for Capital One, you must be eligible to apply for a different position within Capital One to use the Careers Site. If you accept such a position, your benefits programs and Human Resources policies may change. Please consult with the recruiter for the new position concerning application eligibility, benefit programs, and HR policies applicable to that position.

The Careers Site is not intended for distribution to, or use by, any person or entity in any jurisdiction or country where such distribution or use would be contrary to local law or regulation.

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### Changes to this notice

We may change or update this Notice in the future. When we do, we will post the revised Notice on our website. This Notice was last updated and became effective on the date posted at the top of this page.

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### Appendix – Further Information about How We Process Personal Information

#### Personal Information we process

The Personal Information that we process will vary based on the role you are applying for and the Capital One entity for which you are applying for a role. The categories of Personal Information we process may include the following:

- **Personal contact details or identifiers**, such as name, address, telephone number, e-mail address, and other contact information.
- **Identification information**, such as government-issued identifiers including passport number, national identification number, Social Security number, or driver's license number, username and password for our Career sites, and photograph.
- **Demographic information**, such as gender, date of birth, national origin, and military/veteran status.
- **Financial and tax information**, such as banking details.
- **Work authorization information**, such as work authorization status.
- **Background clearance information** (if permitted by local law), such as credit reports, school transcripts, military records, professional history, driving records, and criminal records.
- **Professional history, skills, and certifications**, such as CV, résumé, cover letter, work history, education information, online evaluation results, skills, and professional and other work-related licenses, permits, and certifications held.
- **References information**, such as contact details, your relationship with any Capital One employees, and other information relating to references and referrals.
- **System and application access and usage data**, such as internet or network activity information, including access and activity logs, geo-location data, and call and video recordings.
- **Access control and physical security information**, such as building entrance pass.
- **Travel and event information**, such as travel itinerary details or event registrations.
- **Survey data**, such as your responses to questionnaires, surveys, and requests for feedback.
- **Social media data and other publicly accessible data**, such as publicly accessible information available on your professional social media accounts.
- **Inferences**, such as inferences regarding your preferences, abilities, aptitudes, and characteristics.
- **Health/medical information**, such as disability and data about accommodations requested that we collect in order to accommodate a disability or illness.
- **Sensitive Information**: As discussed above, in certain cases, we process certain types of sensitive information. We will only collect this information where permitted by applicable law and will not collect this data for all roles and in all jurisdictions. Where required by law, we will request your consent before we process any Personal Information considered sensitive under applicable laws, which can include race/ethnic origin, national origin, religion, gender/gender identity, sex life or practices or sexual orientation, marital status, disability, health/medical information (including disability status and vaccine information), genetic or biometric information (including biometric

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templates), political or philosophical beliefs, political party or trade union membership, veteran status, certain background check information, and criminal records or information on other judicial or administrative proceedings.

- Any other information you elect to provide to us (e.g., employment preferences, diversity, inclusion and belonging information, willingness to relocate, current salary, desired salary, awards, or professional memberships).

### How and why we process personal information

We may process your Personal Information for the following purposes:

- **To process your application.** We will engage in these activities based on, where applicable, our legitimate interests or your consent;
- **To assess your capabilities and qualifications for a job.** We will engage in these activities to comply with a legal obligation and/or based on, where applicable, our legitimate interests or your consent;
- **To conduct reference checks.** We will engage in these activities to comply with a legal obligation and/or based on, where applicable, our legitimate interests or your consent;
- **To facilitate your expense claims.** We will engage in these activities based on, where applicable, our legitimate interests or your consent;
- **To respond to your inquiries and communicate with you about your application, and to send you information regarding the Careers Site and changes to our terms and policies.** We will engage in these activities to comply with a legal obligation and/or based on our legitimate interests;
- **To comply with or monitor compliance with any applicable law or regulation.** We will engage in these activities to comply with a legal obligation and/or based on, where applicable, our legitimate interests or your consent;
- **To analyze and monitor the diversity of job applicants, in accordance with applicable law.** We will engage in these activities to comply with a legal obligation and/or based on, where applicable, our legitimate interests or your consent;
- **To conduct background checks if we offer you a position.** We will engage in these activities to comply with a legal obligation and/or based on, where applicable, our legitimate interests or your consent;
- **To preserve our other legitimate interests.** For example, for Capital One's administrative purposes, aggregate management reporting, internal training, and as generally required to conduct our business within Capital One;
- **To comply with applicable law, respond to requests from public and government authorities, and cooperate with law enforcement.** This can include laws and authorities outside your country, province, or region of residence. We will engage in these activities to comply with a legal obligation and/or based on, where applicable, our legitimate interests or your consent;

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- **For other legal reasons, such as to enforce our terms and conditions; and to protect our rights, privacy, safety, or property, and/or that of our affiliates, you, or others.** We will engage in these activities to comply with a legal obligation and/or based on our legitimate interests; and
- **In connection with a sale or business transaction.** We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

### The categories of unaffiliated third parties with whom Capital One shares Personal Information

We may share Personal Information with the following unaffiliated third parties, in addition to sharing Personal Information with our affiliates:

- **Professional advisors:** Accountants, auditors, lawyers, insurers, bankers, and other outside professional advisors in all of the countries, provinces, or regions where Capital One operates.
- **Service providers:** Companies that provide services to us, including companies that help us with operating the Careers Site and service providers who provide recruiting, background check, consulting, IT, and other services.
- **Public and Governmental authorities:** Entities that regulate or have jurisdiction over Capital One such as regulatory authorities, law enforcement, and public and judicial bodies.
- **Corporate transactions:** A third party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of Capital One business, assets, or stock (including in connection with any bankruptcy or similar proceedings).
- **Other third parties that you have authorized or directed to share Personal Information with us, such as family members.**

### Other sources from whom we receive Personal Information

We may receive Personal Information directly from you as well as from other sources:

- your references;
- prior employers;
- employment agencies;
- credit reporting agencies;
- educational institutions you attended; and
- details from your social media accounts, such as LinkedIn.

For example, we may receive Personal Information about you for the purpose of background and reference check reports in connection with your application, and as permitted by applicable law.

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### Affiliates covered by this Notice

The affiliates that may be covered by this Notice include:

- Capital One Financial Corporation
- Capital One, N.A.
- Capital One Services, LLC
- Capital One Services (Canada) Inc
- Capital One Services (India) Private Limited
- Capital One Philippines Support Services Corp.
- Capital One Services, Inc (UK Branch)
- Capital One Technology Labs Mexico, WeWork Torre Reforma Latino, c/o Capital One Technology Labs Mexico, S. De R.L. de C.V. Av. Paseo de la Reforma 296, Int. 27-101, Col. Juárez, Alcaldía Cuauhtémoc 06600, Ciudad de México, México
- Discover Financial Services
- Discover Global Employment Corporation Private Ltd, Herwana, Secretary - Corporate Department, 25 North Bridge Road, Level 7, Singapore 179104
- DFS International Incorporated
- DFS (Hong Kong) Ltd
- DFS Services LLC
- DFS UK Ltd, including French Branch
- Diners Club Services Private Ltd Mumbai
- Diners Club Taiwan Ltd
- Velocity Mobile Limited

Please contact us using the details set out above in the [Your rights, questions and complaints](#) section of this Notice if you have any questions about how Capital One uses Personal Information for the above affiliates.

### Data protection authority contact details

You may contact the data protection authority for your country or region using the following contact details where applicable:

- Canada (Federal) – Office of the Privacy Commissioner of Canada
- Canada (Quebec) – Commission d'accès à l'information du Québec (Quebec Information Commission)
- France – Commission Nationale de l'Informatique et des Libertés (National Commission on Data Files, Data Processing and Civil Liberties)
- Germany – State Data Protection Authorities
- Hong Kong – Office of Privacy Commissioner for Personal Data
- India – Data Protection Board (not yet established)
- Japan – PPC 個人情報保護委員会 (Personal Information Protection Commission)
- Mexico – La Secretaria Anticorrupción y Buen Gobierno (Secretariat for Anti-Corruption and Good Governance)
- Philippines – National Privacy Commission
- Singapore – Personal Data Protection Commission
- Sweden – Integritetsskyddsmyndigheten (Privacy Protection Authority)

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- Taiwan – 個人資料保護委員會 (Personal Data Protection Commission) (not yet established)
- Turkey – Kisisel Verileri Koruma Kurumu (Personal Data Protection Authority)
- UK – Office of the Information and Data Protection Commissioner
- United Arab Emirates (DIFC) – Commissioner of Data Protection, Dubai International Financial Centre Authority