

CANDIDATE PRIVACY NOTICE

Effective January 26, 2024

This Candidate Privacy Notice (the “**Privacy Notice**”) explains how Northland Investment Corporation (“**Northland**”, “**we**”, “**our**”, or “**us**”) collects, uses, and shares your personal information when you apply for employment with Northland.

For questions about our privacy practices, contact us at customerservice@northland.com or write to us at:

Northland Investment Corporation
2150 Washington Street
Newton, MA 02462

1. When This Privacy Notice Applies

This Privacy Notice applies to any personal information Northland collects when you apply for employment with Northland. In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services.

Once you are employed by Northland, please refer to our Employee Handbook for information about our privacy practices. This Privacy Notice does not constitute or form part of any employment contract.

If you use our website or utilize any Northland service in your personal capacity, for example as a tenant or prospective tenant, the Northland [Privacy Policy](#) applies.

2. Information Northland Collects

We collect personal information about you throughout the application and recruitment process as follows:

- *Directly from you*, when you provide information to us (e.g. when you complete our application form) or otherwise interact with us:
 - Personal details, including your name, email address, telephone number, physical address, and certain information we use to further our goal of maintaining a diverse workforce, such as race, ethnicity, gender, veteran status, or whether you have a disability.
 - Education and employment information, including your previous work experience, education, skills, and other qualifications, professional and other work-related licenses, permits, certifications, and information relating to references.
 - Visual information, including CCTV footage of you at our office locations.
 - Any other information you elect to provide to us, including information from social media sites if you choose to link your application to a social media page.
- *From third party sources*:
 - References, including opinions and comments of any previous employer or reference on your work habits, performance, and fitness for employment.

- Results of background checks and screening, including, without limitation, education verification, criminal record checks, and drug screening.

3. How Northland Uses Candidate Information

We use your information for the following purposes:

- *Conduct our hiring process*, evaluate your qualifications for the job you applied for or future jobs that may match your profile, and to communicate with you regarding your job application or other inquiries and requests.
- *Evaluate the effectiveness of our hiring practices*, support our efforts to create and maintain a diverse workforce, and analyze our employment practices.
- *Maintain the safety and security* of Northland and our workplace.
- *Comply with legal and regulatory obligations*, establish or defend against legal claims, and in connection with inquiries from regulators, law enforcement agencies, or parties involved in litigation.

4. How Northland Shares Candidate Information

We share your information in the following instances:

- *With service providers* to perform functions on our behalf and help facilitate the recruitment process, such as our application host, auditing, accounting, and other professional services, security and fraud prevention providers, and IT.
- *When required by law*, such as in response to or in compliance with court or regulatory agency orders, legal proceedings or legal process, exercise our legal rights, defend against legal claims or demands, or comply with the requirements of any applicable law.
- *To prevent harm* and as necessary to detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person.
- *As part of a business transaction* with another entity or its affiliates or service providers in connection with a contemplated or actual merger, acquisition, consolidation, change of control, or sale of all or a portion of our assets or if we undergo bankruptcy or liquidation. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information the same as described in this Privacy Notice.

5. How Long We Retain Your Information

Northland will retain your personal information for as long as is necessary to facilitate the purposes for which it was collected, or as may be required by law. We utilize the following criteria to determine the length of time for which personal information is retained:

- Whether you are successful or unsuccessful with your application for employment;
- Whether we are required to retain the information in order to comply with legal obligations or contractual commitments, to defend against potential legal claims, or is otherwise necessary to investigate theft or other activities potentially in violation of Northland's policies and procedures applicable to you or against the law, or to protect health and safety;
- The privacy impact to you of ongoing retention, including your likely expectations in light of the sensitivity of the information we've collected; and

- The manner in which information is maintained and flows through our systems, and how best to manage the lifecycle in light of the volume and complexity of the systems in our infrastructure.

Individual pieces of personal information may exist in different systems that are used for different business or legal purposes. A different maximum retention period may apply to each use case of the information. Certain individual pieces of information may also be stored in combination with other individual pieces of information, and the maximum retention period may be determined by the purpose for which that information set is used.

6. How We Protect Your Information

We use physical, technical, and administrative measures designed to protect the information we collect. While we use these precautions to safeguard your information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

7. Updates

We may make changes to this Privacy Notice from time to time. The “Effective Date” at the top of this page indicates when this Privacy Notice was last revised. We may also notify you in other ways from time to time about the collection, use, and disclosure of your personal information described in this Privacy Notice.

8. Additional Information For California Residents

If you are a California resident, you have the right under the California Consumer Privacy Act (“CCPA”) to receive notice of the categories of personal information we collect, the purposes for which those categories of personal information will be used, and how we determine the length of time for which the personal information is maintained.

Collection, Use, and Retention

The following chart describes our practices with regard to the collection, use, and retention of candidate personal information. We use categories to describe the information we process that are listed in the CCPA and certain personal information may fall into multiple categories. Some of the categories include very different types of information. As a result, how we use and how long we keep the information within each category will vary. The examples of personal information listed below are illustrative and do not represent a complete description of the information we process.

For each category of personal information, the personal information is subject to the retention criteria set forth in How Long We Retain Your Information above. Generally, information processed in connection with job applications is retained for a reasonable period of time following completion of the evaluation process due to legal requirements and to allow us to analyze and improve our recruitment processes. If you receive and accept an offer of employment, we may retain your application materials as part of your employee records.

Category	Required Information
Identifiers	<p><i>Name, email address, telephone number, physical address</i></p> <p><u>Source</u>: Directly from you.</p> <p><u>Purpose of collection and use</u>: All purposes listed in <u>How Northland Uses Candidate Information</u> above.</p>
Personal information categories listed in the California Customer	<p><i>Name, education, employment history</i></p> <p><u>Source</u>: Directly from you; from third parties.</p>

Records statute (Cal. Civ. Code § 1798.80(e))	<p><u>Purpose of collection and use:</u> All purposes listed in How Northland Uses Candidate Information above.</p>
Protected classification characteristics under California or federal law	<p><i>Age, national origin, gender, veteran or military status</i></p> <p><u>Source:</u> Directly from you.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How Northland Uses Candidate Information above.</p>
Professional or employment related information	<p><i>Work history, job performance information</i></p> <p><u>Source:</u> Directly from you; from third party sources.</p> <p><u>Purpose of collection and use:</u> All purposes listed in How Northland Uses Candidate Information above.</p>
Education information	<p><i>Institutions attended, degrees obtained, and courses taken</i></p> <p><u>Source:</u> Directly from you; from third party sources</p> <p><u>Purpose of collection and use:</u> All purposes listed in How Northland Uses Candidate Information above.</p>
Audio and visual information	<p><i>Video taken by security cameras if you visit Northland's offices</i></p> <p><u>Source:</u> Directly from you</p> <p><u>Purpose of collection and use:</u> All purposes listed in How Northland Uses Candidate Information above.</p>
Inferences drawn from other information	<p><i>Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes</i></p> <p><u>Source:</u> We do not actively create profiles of the preferences or interests of our candidate; however, certain of this information may be collected incidentally during the process of evaluating your application for employment</p> <p><u>Purpose of collection and use:</u> All purposes listed in How Northland Uses Candidate Information above.</p>
Sensitive information	<p><i>Racial or ethnic origin</i></p> <p><u>Source:</u> Directly from you</p> <p><u>Purpose of collection and use:</u> All purposes listed in How Northland Uses Candidate Information above.</p>

Sale and Sharing of Candidate Information

Any category of information listed in the chart above may be disclosed for a business purpose to service providers, which are companies or individuals that we engage to conduct activities on our behalf. Service providers are restricted from using personal information for any purpose not related to our engagement. Please see [How Northland Shares Candidate Information](#) above for more information about how we share your information.

California law also requires us to provide you with information regarding the parties to whom we sell (disclosing personal information to another company for monetary or other benefit) or share (disclosing personal information for purposes of cross-contextual behavioral advertising) your personal information. We do not sell or share personal information relating to our job candidates.

Rights

You the right to request **access** to personal information collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties and service providers with whom we share it. You also have the right to request we **correct inaccurate information**, and to request in certain circumstances that we **delete personal information** that we have collected directly from you. You have the right to be **free from discrimination** based on your exercise of your CCPA rights.

You may submit a request to exercise your right to access, correct, or delete your personal information by sending an email to customerservice@northland.com.

In order to process your request, we must verify your request. We do this by asking you to provide personal identifiers we can match against information we may have collected from you previously and confirm your request using the email account stated in the request.

You have the right to **opt out** of the sale of sharing of personal information to third parties; however, we do not sell or share candidate information.

You also have the right to request that we **limit use of your sensitive personal information** to certain purposes allowed by law; however, we do not process your sensitive personal information in circumstances that would be subject to the right to limit.