

## **APPLICANT PRIVACY POLICY**

(Last Updated August 2025)

Please carefully read this Privacy Policy (the “Privacy Policy” or “Policy”) before using this website. Your access to and use of this website and application for a job at IMPAC Mortgage Holdings, Inc. and its subsidiaries (“IMPAC”) are conditioned on your acceptance of this Privacy Policy. If you do not accept it, you should leave the website and not submit any information through this website.

### **SCOPE OF THIS POLICY**

For purposes of this Privacy Policy, “IMPAC” refers to IMPAC and its affiliates. The term “Information” also includes any personal information submitted by you through the website.

### **INFORMATION WE COLLECT**

When you apply for a job with us, we may collect certain Information from and about you in order to evaluate and process that application. This information may include:

- Contact information, such as name, telephone number, fax number, physical address, email, and username;
- Previous work experience, compensation, education, degrees, language, and other skills and employment-related information;
- Professional and other work-related licenses, permits, and certifications;
- Awards and professional memberships;
- Information regarding your use of our website, as described in the IMPAC Cookie Notice.
- Work authorization status;
- Information relating to references;
- Information from social media sites if you choose to link your application to a social media; and
- Any other information you elect to provide to us (e.g., employment preferences, willingness to relocate, and desired salary).

### **APPLICANT DATA**

For purposes of this Policy, your job application, personal data and any other information you submit while using this website is called “Applicant Data.”

## **SENSITIVE PERSONAL INFORMATION**

Certain types of information are considered sensitive personal information in certain jurisdictions. This includes the following: information on race, religion, ethnicity, nationality or national origin, age, gender identity, sex, life or sexual orientation, criminal convictions and offenses, marital status, medical or health information (including disability status), genetic or biometric information, religious or philosophical beliefs, political party or trade union membership, background check information, and veteran status.

Under the California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act of 2020 (“CPRA”), the following information is also defined as sensitive personal information: precise geolocation, social security number, driver’s license number, state identification card number, passport number, account log-in/financial account/debit card/credit card number in combination with any required security or access code, password, or credentials allowing access to an account, and the contents of a consumer’s mail, email and text messages, unless the business is the intended recipient of the communication.

Depending on the stage of an application, in addition to the information you provide to us, we may obtain information about you from other third parties, such as platforms used to collect application information, recruiters, references, former employers, and law enforcement agencies.

## **HOW APPLICANT DATA IS USED**

Your application, your personal data and any other information you submit while using this website (“Applicant Data”) will be used by IMPAC for job application evaluation and processing, human resources and employment purposes.

Unless legally required to do otherwise, IMPAC will share your data only with other entities hired to provide employment verification services, or human resource services providers, and always under conditions of confidentiality.

IMPAC will not trade or sell your personal information for use by any other company without your prior consent.

The information you submit will be accessible to the IMPAC personnel involved in the job application and recruitment processes.

**BY TRANSMITTING INFORMATION TO IMPAC VIA THIS WEBSITE, YOU EXPLICITLY CONSENT, UNDERSTAND AND AGREE THAT IMPAC MAY USE THAT INFORMATION FOR JOB APPLICATION EVALUATION AND PROCESSING, HUMAN RESOURCES AND EMPLOYMENT PURPOSES, INCLUDING:**

- Using this information to evaluate you as a candidate for a position with IMPAC;
- Disclosing the information to IMPAC managers, supervisors or other IMPAC employees (this includes possible disclosure to IMPAC affiliates and subsidiaries);

- The transmission and storage of your information to a secure data center in the U.S. managed by a trusted service provider;
- If a job offer is extended, your information may also be shared with one or more service providers assisting in the hiring process;
- Using the information to comply with job applicant and employee reporting requirements, when required by law;
- Analyze your qualifications for the job you applied for or future jobs that may match your profile;
- Communicate with you regarding your job application, your inquiries and requests, other job openings, or important notices;
- Conduct criminal history, background, and employment checks, if we offer you a position;
- Support our efforts to maintain a diverse workforce;
- Comply with or monitor our compliance with any applicable law or regulation; and
- We may use and share information in an aggregated or de-identified manner data at our discretion, including for research, analysis, modeling, marketing, and improvement of our Services.

Your Applicant Data will be added to our resume database, which is currently located in the United States. In the future, this database might be re-located and stored on non-U.S. servers without prior notice.

You may be asked to voluntarily provide certain personal data (for example, your gender) for various reasons, including:

- 1) to meet government requirements;
- 2) in connection with diversity, inclusion and/or human resource initiatives or
- 3) if required to do so under applicable local law or regulations. IMPAC may disclose this “self-identification” data externally, but only in the aggregate (meaning that your personal data will not be shared) and only for limited purposes, such as to respond to customer inquiries or surveys. Self-identification data will not be used to make decisions regarding recruitment and hiring. However, if you are hired, such self-identification data may be stored in the IMPAC human resources management system.

## **WHO MIGHT ACCESS OR RECEIVE APPLICANT DATA**

IMPAC may also share your personal data with IMPAC personnel or other IMPAC entities for further consideration. IMPAC may also share and transfer your personal data to an affiliate, subsidiary or unrelated company in relation to a merger, acquisition, sale or disposal. IMPAC may also permit third parties, such as technical personnel, to access its job applicant database for the purpose of

maintenance, testing, software upgrades and the like. All such third parties will be required to sign appropriate confidentiality agreements.

IMPAC may share your Applicant Data with other companies who provide employment verification and/or background check services.

## **YOUR RIGHTS WITH RESPECT TO YOUR PERSONAL DATA**

As explained above, your personal data may be processed during the recruitment process by IMPAC, its affiliates and service providers, including entities not located in European Economic Area (EEA).

Your responses to questions requesting your personal data are voluntary and you have the right to access, correct and/or delete your personal data by contacting [hrsupport@regalhr.com](mailto:hrsupport@regalhr.com). If you request the deletion of your personal data and you are a U.S.-based candidate, it will be retained in accordance with applicable laws regarding record retention, but you may withdraw your employment application at any time and IMPAC will make your record inactive.

## **RETENTION OF APPLICANT DATA**

Some countries' laws require Applicant Data to be retained for a specific period of time. Thus, once you submit your information, it will be retained in accordance with applicable legal and regulatory requirements.

## **INFORMATION SENT BY YOUR WEB BROWSER**

IMPAC may collect information that is sent to us automatically by your web browser. This information typically includes the IP address of your Internet service provider, the name of your operating system and name and versions of your browser. The information we receive depends on your computer or device's web browser settings. Please check your browser if you want to view what information your browser sends or learn how to change the browser settings.

## **INFORMATION COLLECTED BY PLACING A "COOKIE" ON YOUR COMPUTER**

IMPAC may obtain information about you by installing a "tag" on your computer's hard drive. This tag is known as a "cookie." This website uses "session cookies." A session cookie is used to tag your computer with a computer-generated, unique identifier when you access our site. A session cookie does not identify you personally and expires after you close your

Internet browser. IMPAC uses session cookies to collect statistical information about the use of this website. We analyze this information (known as "clickstream data") in statistical form to better understand website visitors' interests and needs to improve the content and functionality of the site. You may set your Internet browser to reject cookies or alert you when a cookie is placed on your computer. Although you are not required to allow your browser to accept cookies when your computer visits this website, please be aware you may be unable to use all of the functionality of the site if your browser rejects cookies.

## **WEBSITE DISCLAIMER**

IMPAC will use reasonable efforts to include up-to-date and accurate information on this website, but to the extent permitted by law, IMPAC makes NO REPRESENTATIONS, WARRANTIES, OR ASSURANCES AS TO THE ACCURACY, CURRENCY OR COMPLETENESS OF THE INFORMATION PROVIDED. IMPAC WILL NOT BE LIABLE FOR ANY DAMAGES OR INJURY RESULTING FROM YOUR ACCESS TO (OR INABILITY TO ACCESS) THIS WEBSITE, OR FROM YOUR RELIANCE ON ANY INFORMATION THAT IS PROVIDED ON THIS WEBSITE.

## **CHANGES TO THIS PRIVACY POLICY**

IMPAC reserves the right to update or modify this Privacy Policy at any time without prior notice, by posting a revised version on this site.

## **CHANGES TO OUR JOB APPLICANT NOTICES**

We reserve the right to modify, alter, or update the terms and conditions of this Policy from time to time without prior notice. We will post those changes on this page in addition to updating the “Last Updated” date at the top of this webpage. Modifications shall become effective immediately upon being posted.

## **SECURITY**

We implement the appropriate organizational, technical, and physical security measures and controls to protect the confidentiality, integrity, and availability of the personal information entrusted to us. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of any account you might have with us has been compromised), please immediately notify us of the problem by contacting us at [hrsupport@regalhr.com](mailto:hrsupport@regalhr.com).

## **ADDITIONAL INFORMATION AND REQUIRED DOCUMENTS**

You may be required to produce original documents that verify your employment eligibility and identification. Unless otherwise noted in a specific job description, relocation assistance is not provided. Where permitted by law and/or required locally, a medical questionnaire and/or standard medical exam (or medical exam determined by IMPAC) and/or a drug test may be requested by IMPAC as part of the application process.

## **AUTHORIZATION**

Subject to applicable law, I authorize IMPAC to undertake a background check, including but not limited to a conviction search and verification of the information I have provided. I agree to sign any additional documents that may be required in order for IMPAC to undertake such an investigation. I authorize IMPAC to collect, process, transmit and store my personal data in the United States, where it will be handled for the IMPAC application process, for sending me announcements of future job opportunities as they become available and for administrative purposes.

For residents of the European Economic Area (EEA), I understand and agree that IMPAC may transfer my personal data to countries outside EEA.

## **QUESTIONS**

Any questions you have about this policy should be sent to [hrsupport@regalhr.com](mailto:hrsupport@regalhr.com).