

# Recruitment Privacy Statement

## Introduction

We are committed to protecting the personal data of all applicants and prospective candidates. We define personal data broadly as information that directly identifies an individual or that makes an individual identifiable when combined with other information. The purpose of this policy is to let you know how we handle the information collected through the use of this website.

This Recruitment Privacy Statement (“Privacy Statement”, “Policy”) describes how Oriental Bank collects, uses, discloses, transfers, and stores personal data as part of our recruitment process for companies under OFGBancorp. It provides details on your personal data rights and how to exercise your rights with us. In case of a conflict between this Privacy Notice and applicable law, applicable law will govern.

This Privacy Statement applies to all candidates, potential employees, and individuals applying for a role with Oriental Bank, throughout the application and recruitment process. This Privacy Notice does not apply to the personal data of our employees, partners, clients, vendors, or any other person from whom the Company collects personal data for other purposes. We recommend that you read this Privacy Statement completely to ensure you are fully informed.

As used in this policy, terms such as “we,” “us,” “our,” and “Company” refer to Oriental Bank and its current and future affiliated entities, including our parent company OFGBancorp, Oriental Financial Services LLC, Oriental Insurance LLC, Oriental Pension Consultants, and its respective parent companies, affiliates, subsidiaries, divisions and franchises, if any, successors, stockholders, directors, officers, employees, agents, representatives, insurers, and/or all affiliated entities.

Oriental Bank, is part of OFG Bancorp, founded in 1964, and operates under United States, Puerto Rico and U.S. Virgin Islands banking laws and regulations. It is a public Federal Deposit Insurance Corporation (FDIC) insured banking institution and is listed on the New York Stock Exchange (NYSE) under OFG. This website is intended for United States of America, Puerto Rico and US Virgin Islands.

## Personal Data We Collect Directly from You

The types of personal data we collect and process when you apply for a role with Oriental Bank include (but are not limited to):

- **Identification data and contact details**, including your name, address, email address, phone number and other contact information, date of birth, nationality, national identifiers (such as national ID/passport, social security number(s)).
- **Account registration details**, such as email and password.
- **Employment history**, such as previous employers and job titles/positions.
- **Background information**, such as academic/professional qualifications, job qualifications, education, details included in your CV/résumé (which might include details of achievements, any memberships or interests constituting sensitive personal information), transcripts, and employment references.
- Details of your **immigration/visa status**, such as work authorization.

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- **Other information you voluntarily provide** throughout the process, including through internal or third-party assessment centers/exercises and interviews.

You can apply for a role at Oriental Bank using a few third-party career sites; for example, LinkedIn. Doing so will connect your profile from these systems with the Oriental Bank job application. If you choose to incorporate your personal data from third-party websites, it will be used in accordance with this Privacy Notice.

We may also collect sensitive personal data to the extent that a candidate chooses, without being asked, to voluntarily disclose it during the recruiting process. Under limited circumstances and to the extent permitted by applicable law, we may also collect sensitive personal information relating to health and medical characteristics, such as status of infection, test results, and vaccination status, to address our public health and workplace safety obligations and to protect the Company and its employees, clients, and third parties. As part of our commitment to diversity and inclusion, where authorized by law or necessary to comply with applicable laws, we will ask you to provide demographic information such as ethnicity, race, or gender.

### Information That We Collect Automatically

When you visit the Oriental Bank recruitment site, we may use cookies, web beacons, tags, and scripts. For example, we collect and measure traffic data for specific sources such as third-party recruitment sites.

### Personal Data Collected from Other Sources

We typically collect personal data directly from you but there may be situations where we collect personal data from other sources. For example, we may collect the following:

- Information provided by entities you have asked to support you in finding a job, including recruiting agencies, educational institutions, professional organizations, or alumni resume sharing platforms.
- Information provided by Oriental Bank personnel who have referred you for a job.
- Information provided by background-checking agencies, including (where lawful) criminal background checks, to verify the accuracy of information you have provided.
- Information provided by referees in response to reference requests.
- Information provided by prior employers.
- Information collected from publicly available sources, including any business social media platforms you use or other information available online.

### How We Use Your Personal Data

We collect and use your personal data primarily for recruitment and human resources purposes; in particular, to determine your qualifications for employment and to reach a hiring decision. This includes assessing your skills, qualifications, and background for a particular role, verifying your information, carrying out reference checks, background checks, in order to assess your suitability and eligibility for work for Oriental Bank, and to generally manage the hiring process and communicate with you about it. If we ask you to complete a candidate assessment with a third-party provider, we will include the results

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in the recruitment process. We will also capture additional personal data during in-person and/or remote interviews to assess your suitability for the job.

If you are successful in the interview process, we will carry out background checks and validation of your experience and academic and professional qualifications. We will use a third-party organization to perform these checks and may share the identity information that you have provided. Background checks will be completed only as permitted by local law.

If you accept a role at Oriental Bank, the information collected during the recruitment process may form part of your personnel file, to the fullest extent allowable, and will be processed in accordance with our employment privacy statement.

As an Equal Opportunity Employer, Oriental Bank, is required by law to provide reports on the diversity of our recruitment talent pools and will need to send reports to the relevant authorities covering a particular time period.

If you are not successful in the interview process, we may keep your details so that we may reach out to you and invite you to apply for other positions that we think may be a good fit for you unless you request that we delete your application.

We use cookies and similar technologies to authenticate your access to the careers site, and to capture your interactions, preferences, transactional information, and other device and connection information relating to your use of the site. These technologies are also used when you use the "Sign in with LinkedIn" options on the open positions.

### Disclosure of Data

We only disclose your personal data to those who require access to perform their tasks and duties, and to third parties that have a legitimate purpose for accessing it.

We will disclose your personal data to the following categories of recipients:

- Members of Oriental Bank in order to administer the recruitment process.
- Background-checking or other screening providers and third parties that verify employment history, academic and professional achievements, and assist with the collection and preparation of applications for background check clearance.
- Third-party service providers that support the Oriental Bank Recruitment process (such as recruitment or executive search agencies involved in your recruitment)
- Third parties where you have consented or otherwise instructed Oriental Bank to share your personal data.
- Third parties to comply with our legal obligations, including where necessary to abide by law, regulation, or contract, or to respond to a court order, administrative, or judicial process.
- Third parties as necessary to establish, exercise, or defend against potential, threatened, or actual litigation.
- Public authorities in response to lawful requests.

We will implement appropriate measures to ensure that third-party organizations that we use to process data on our behalf use information in a manner consistent with this Privacy Statement and with applicable law, and that the security and confidentiality of the information is maintained. Oriental Bank does not sell personal data that we collect or process as part of the recruitment process or any related processes.

### Data Retention

Your personal data will be stored in accordance with applicable laws and kept as long as needed to carry out the purposes described in this Privacy Statement or as otherwise required by applicable law.

### Your Rights Over Your Personal Data

Depending on where you are located, you may have certain rights under local privacy laws over the personal data we hold about you. These may include the right to:

- Access the personal data we hold about you.
- Have incorrect personal data updated or deleted.
- Have your personal data deleted.
- Restrict the processing of your personal data.
- Object to the processing of your personal data carried out on the basis of our legitimate interests.
- Receive a copy of your personal data in an electronic and machine-readable format.
- Withdraw your consent to the processing of your personal data, to the extent our processing relies on your consent as the lawful basis for processing. This right may not apply if there are other legal justifications to continue processing or we need to retain certain personal data where required or permitted under applicable law.
- Individuals performing administrative functions and IT personnel within Oriental Bank may also have limited access to your personal data to the extent necessary to perform their jobs.
- Complain to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority.

If you would like to make a request to access, review, correct, delete or port the personal data we have collected about you, to assert a right with regard to your personal data, or to discuss how we process your personal data, please contact at the address provided below. To help protect your privacy and security, we will take reasonable steps to verify your identity before granting you access to your personal data. Oriental Bank will not discriminate against you for exercising your rights. You, or an authorized individual who we can verify is acting on your behalf, can exercise the applicable rights by contacting us using the contact details at the bottom of this Privacy Statement. We reserve the right to charge an appropriate fee for complying with your request were allowed by applicable law, and/or to deny your requests were, in Oriental Bank's discretion, they may be unfounded, excessive, or otherwise unacceptable under applicable law.

### Security

We use technical and organizational measures that provide a level of security appropriate to the risk of processing your personal data. However, the security of information transmitted through the internet

can never be guaranteed. You are responsible for maintaining the security of your password or other form of authentication involved in accessing password-protected or secured areas of any Oriental Bank recruitment web page. Access to and use of password-protected and/or secure areas of any Oriental Bank recruitment web pages is restricted to authorized users only.

### Changes to This Privacy Statement

This Privacy Statement may be amended or revised from time to time at Oriental Bank's discretion. The most recent document is available via the Oriental Bank careers web page. If we propose to make any material changes, we will provide notice on this. We encourage you to periodically review this page for the latest information on our privacy practices.

### How to Contact Us

If you have any questions about this Privacy Statement, wish to exercise your rights or to contact us, you may also contact us at one of the mailing addresses below:

Oriental Bank  
Attn.: Risk & Compliance Department (Re: Privacy Policy)  
PO Box 195115  
San Juan, PR 00919-5115

Oriental Bank will respond to your request within a reasonable time frame or as required by law.