

## NBER EMPLOYEE AND APPLICANT PRIVACY POLICY

This Privacy Policy describes how National Bureau of Economic Research (“NBER”, “us”, “our” or “we”) collects, uses and discloses information about individuals who apply for employment or a fellowship at NBER (each, an “Applicant”) and those individuals employed by NBER, either on a full-time or part-time basis (each, an “Employee”). Please read this Privacy Policy carefully, together with any other privacy notice we may provide to you from time to time, so that you are aware of how and why we are using your Personal Data.

### 1. Processing of Employee Personal Data

In the course of its business, NBER collects, stores, transmits, and processes certain types of information related to Employees (“Employee Personal Data”). Some of this information may be considered “Personal Data,” meaning it reasonably identifies you or your device or it is reasonably associated with you.

NBER may collect the following information:

- **Identification and demographic information**, such as your name, address, gender, date and place of birth, telephone number, e-mail address, social security number, and nationality;
- **Payroll and benefit information**, such as your bank account number, data relating to salary and other remunerations and benefits, and data relating to tax and social security contributions;
- **Employment information**, such as data relating to terms of employment, training, courses, work placements, data relating to previous and current positions, data relating to nature, content and termination of employment, data relating to attendance, and data relating to absence and the reasons therefore;
- **Performance information**, including data relating to performance evaluations/reviews, and summaries of disciplinary action or complaint details;
- **Information about others**, such as contact data concerning parents/guardians for minors, data relating to current or former family members, details of dependents, and referrals of job candidates for employment with NBER. Where you submit information on behalf of another person, you confirm that you have made that person aware of how we may collect, use and disclose their information, the reason you have provided it, how they can contact us, the terms of this Privacy Policy and that they have consented to such collection, use and disclosure; and
- other information voluntarily disclosed by an Employee.

Employee Personal Data may be used for the following purposes:

- to administer human-resource functions relating to the recruitment, appointment, review and evaluation of Employees;
- to evaluate and administer payroll, the payment of expenses, remuneration and other benefits to Employees, such as bonuses, medical care, life insurance and long term disability plans;
- to notify Employees about products, services and benefits provided by selected third parties which NBER considers may be of interest to Employees;
- to enable NBER to monitor and perform the duties and obligations arising under contracts of employment or with contracts with third parties;
- in order to carry out and manage the business of NBER, including for statistical analysis, or to comply with NBER’s legal obligations, for example, under laws in such areas as immigration, tax or financial regulation;

- to prepare to conduct or conduct or assist in internal investigations, audits or inquiries involving NBER;
- to investigate and resolve any grievances, complaints, misconduct, breaches of any contract of employment, any applicable internal regulations or any codes or policies of NBER by or involving an Employee or where necessary to take disciplinary action against an Employee;
- in regard to proceedings, inquiries and investigations of governmental, administrative, judicial or regulatory authorities involving NBER and responding to any requests or demands made on NBER by any such authorities; and
- to conduct activities in connection with actual or prospective legal proceedings involving NBER or for the purposes of obtaining legal advice or establishing or defending legal rights of NBER.

In order to process Employee Personal Data for the purposes described in this Employee and Applicant Privacy Policy, such Employee Personal Data, as is necessary, may be disclosed to any of the following:

- any member of NBER who may need access to such data in order to perform any of the purposes described in this Privacy Policy;
- agents, contractors, consultants and advisors of NBER or to any third party involved with any payments or benefits to which an Employee, dependent or other beneficiary is entitled and to such dependent or other beneficiary;
- to any future employer of an Employee who requests a reference in accordance with the policies and procedures in the NBER Employee Guidelines;
- to any proposed assignee or transferee of NBER's interest under any agreement, including a contract of employment, that NBER has with an Employee;
- to any governmental, administrative, judicial or regulatory authorities, including the police, in order for NBER to co-operate in proceedings, inquiries and investigations by such authorities or in response to any requests or demands made on NBER by such authorities or in order for NBER to comply with any legal, regulatory or contractual obligations; and
- to third parties in order to protect the legitimate interests of NBER, including actual or prospective legal proceedings involving NBER or for the purposes of obtaining legal advice or establishing or defending legal rights of NBER.

## 2. Processing of Applicant Personal Data

In the course of evaluating applications of employment and fellowships, NBER collects, stores, transmits, and processes certain types of Personal Data related to Applicants ("**Applicant Personal Data**"), which may include, but is not confined to:

- **Identification and demographic information**, such as name, address, gender, date and place of birth, telephone number, e-mail address and similar communications data, social security number, nationality,
- **Employment history**, including data relating to previous and current position, data relating to nature, content and termination of the employment, pre-employment references, academic record, qualifications, job title, and
- **Information provided by other sources**. To process your application for a position, we may also obtain information about you from outside sources, such as information obtained from a background check;

- **Information about others**, such as when you submit information on behalf of another person. In such instances, you confirm that you have made that person aware of how we may collect, use and disclose their information, the reason you have provided it, how they can contact us, the terms of this Privacy Policy and that they have consented to such collection, use and disclosure; and
- other information voluntarily disclosed by an Applicant.

Applicant Personal Data may be processed for the following purposes:

- to administer human-resource functions relating to the recruitment and appointment of Applicant and to analyze the opportunities, remuneration and benefits available to Applicant if the Applicant were to enter into contract with NBER;
- in order to carry out and manage the business of NBER, including for statistical analysis, or to comply with NBER's legal obligations, for example, under laws in such areas as immigration, tax or financial regulation;
- in regard to proceedings, inquiries and investigations of governmental, administrative, judicial or regulatory authorities involving NBER and responding to any requests or demands made on NBER by any such authorities; and/or
- to conduct activities in connection with actual or prospective legal proceedings involving NBER or for the purposes of obtaining legal advice or establishing or defending legal rights of NBER.

In order to process Applicant Personal Data for the purposes described in this Privacy Policy, such Applicant Personal Data, as is necessary, may be disclosed to any of the following:

- any member of NBER who may use the Applicant Personal Data for any of the purposes described in this Employee and Applicant Privacy Policy;
- agents, contractors, consultants and advisors of NBER or to any third party involved with any payments or expenses to which an Applicant is entitled;
- to any governmental, administrative, judicial or regulatory authorities, including the police, in order for NBER to co-operate in proceedings, inquiries and investigations by such authorities or in response to any requests or demands made on NBER by such authorities or in order for NBER to comply with any legal, regulatory or contractual obligations; and
- to third parties in order to protect the legitimate interests of NBER including actual or prospective legal proceedings involving NBER or for the purposes of obtaining legal advice or establishing or defending legal rights of NBER.

### 3. **Sensitive Employee and Applicant Personal Data**

The general policy of NBER is to avoid the collection of data that is sensitive in nature when it is unnecessary for NBER's business purposes. For example, NBER will generally not collect any personal information relating to an Employee or an Applicant's political opinions, religious or other similar beliefs, or sexual life, but it may gather such information if necessary, for instance, in ordering a kosher meal.

For very specific purposes, as listed below, NBER may collect data of a sensitive nature, such data may include details of physical or mental health or condition, religious or other similar beliefs, sexual like or political information ("**Sensitive Personal Data**"). Any Sensitive Employee Data and Applicant Personal Data will only be collected and processed to the extent permitted by law if:

- necessary for the management of NBER's sickness, absence or long-term disability plans, or to manage the health and safety of individuals at work, or to establish any adaptations to the workplace necessary to improve an Employee's health and safety at work;

- the processing is necessary or desirable for the purposes of determining whether an Employee or an Applicant is in good enough physical condition to carry out job functions at NBER;
- necessary to provide an Employee or an Applicant with a reasonable accommodation;
- necessary with respect to legal requirements or in connection with proceedings, inquiries and investigations by any governmental, administrative, judicial or regulatory authorities, including the police, or in response to any requests or demands made on NBER by such authorities or in order for NBER to comply with any legal or regulatory obligations;
- necessary with respect to efforts to ensure equal employment opportunities; and
- the processing is necessary or desirable for the purposes of obtaining legal advice or establishing or defending legal rights of NBER.

#### **4. Transfer of Personal Data to the U.S. and Other Countries**

NBER is based in the United States and we process and store information in the U.S. and other countries. Therefore, we and our service providers may transfer your information to, or store or access it in, jurisdictions that may not provide equivalent levels of data protection as your home jurisdiction.

#### **5. Use, Access, and Monitoring of Technology Resources**

NBER provides technology resources to Employees to assist them in performing their duties. The obligations of Employees in using such technology resources and the monitoring and access by NBER of such technology resources are set out in the Employee Manual.

#### **6. Access to Personal Data**

Employees and Applicants may have certain rights under applicable privacy or data protection legislation which includes the right to receive a copy of their Personal Data (including any Sensitive Personal Data) that NBER holds on them and to receive written information about the purposes of the processing and from where the data originates.

If an Employee or an Applicant believes his/her Personal Data is incorrect, incomplete or misleading he or she should immediately advise NBER's Human Resources Department using the information below who will then, if the Employee or Applicant is correct, rectify or erase this Personal Data.

#### **7. Data Accuracy**

It is the Employee and Applicant's responsibility to advise NBER of any changes to his/her personal circumstances which may have a bearing upon the Employee's benefits or general employment. In particular, the Employee and Applicant should advise NBER's Human Resources Department of any change of name, address, personal telephone number, or any other information, as these become known.

#### **8. Policy Modification**

We reserve the right to update this Privacy Policy at any time, and we will provide you with a new policy when we make any substantial updates. Material revision will apply only prospectively. We may also notify you in other ways from time to time about the processing of your Personal Data.

#### **9. Questions; Contact Information**

NBER recognizes the importance of maintaining data privacy standards which protect the interests of Employees and Applicant. If you have any concerns about how your Personal Data (including any Sensitive Personal Data) is or may be processed or any aspects of this Privacy Policy, please contact NBER's Human Resources Department: 617-588-0484 or [hr@nber.org](mailto:hr@nber.org).

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