# DATA PRIVACY AND DISCLOSURE APPLICANT/EMPLOYEE NOTICE PURSUANT TO CALIFORNIA CONSUMER PRIVACY ACT

#### **Introduction - Our Privacy Commitment to You**

We believe that top quality customer service is a very important part of our business. We also understand that our employees play an important role in maintaining top quality customer service. We greatly appreciate the trust that you and our employees have placed in us, and we will protect that trust by continuing to respect and protect the privacy of all our employees and those persons that apply for employment with this dealership. This policy applies even if you are not hired by this dealership and, if you are hired, even if your employment later ends.

## We Implement Strong Security Measures to Protect Your Private Data

We have in place stringent strong measures to protect your private data that we collect. We believe our security measures exceed the "reasonable security measures to safeguard the data" required by the law so that your private information is protected from unauthorized access and/or disclosure. Those security measures include, but are not limited to, using passwords to access our computer systems and using secured servers and encryption to store and to transmit data.

# What Categories of Personal Information We Collect About You And What is the Purpose of Collecting Such Information

We collect various categories of personal information about you for business purposes only. It is important for you to know that in order to ensure that our business has the best staff available and we are able to meet the needs of our staff and customers we collect and/or obtain the following categories of personal information, but only to the extent and at the times permitted by the law.

Category 1: Demographic Information. We collect demographic information (like your name and address, previous addresses, telephone numbers and emails addresses). We collect this information for various reasons, all associated with a valid business purpose. For example, Demographic Information is collected for the purposes of being able to contact and/or communicate with you, to consider your suitability for employment, to populate and to administer employment-related documents for your employment. We also collect information in order to: comply with federal and state laws and requirements; process and transmit payroll, taxes and withholding; collect and record your hours worked/attendance; submit worker's compensation claim; administer private and government employee health and other benefit programs; engage in performance management and evaluations for discipline and/or

promotions; conduct workplace investigations; grant access to secured company systems, devices and locations; implement electronic security measures; consider you for transfers to other affiliated entities; evaluate potential buy/sells of the dealership assets; apply and maintain various forms of insurance; collect and analyze worker data and benchmarks, conduct video, telephone and/or internet usage surveillance; otherwise conduct lawful business-related activities.

Category 2: Personal Identifying Information. We collect other personal identifying information on you such as, but not limited to, your social security number, driver's license number, bank account information, credit and/or debit card information, characteristics of protected classifications under federal, state and local laws such as, but not limited to sex, age, race, religion, national origin, military status, language, disability, medical conditions, citizenship, immigration status and marital status. We collect this information for various reasons, all associated with a valid business purpose. For example, Personal Identifying Information is collected for the purpose of considering your suitability for employment, to run background checks, to verify your identity, to populate and to administer employment-related documents for your employment, payroll, withholding and/or employee benefits. We also collect information in order to: comply with federal and state laws and requirements; process and transmit payroll, taxes and withholding; collect and record your hours worked/attendance; submit worker's compensation claims; administer private and government employee health and other benefit programs; engage in performance management and evaluations for discipline and/or promotions; conduct workplace investigations; grant access to secured company systems, devices and locations; implement electronic security measures; consider you for transfers to other affiliated entities; evaluate potential buy/sells of the dealership assets; apply and maintain various forms of insurance; collect and analyze worker data and benchmarks, conduct video, telephone and/or internet usage surveillance; and, otherwise conduct lawful business-related activities.

Category 3: Background Information. If you are offered employment and/or hired, you might provide and/or we will collect background information on you, as permitted by law, such as date of birth, passport information, immigration visas, work permits/authorizations, birth certificate, criminal history, some forms of credit history, driving record, educational history and/or educational degrees, including official credentials, professional licenses, permits and/or certificates. This information may come from an outside source such as an Investigative Consumer Reporting Agency and if it does, you will receive information about that agency and what is collected after an offer of employment is extended. We collect this information for various reasons, all associated with a valid business purpose. For example, Background Information is collected for the purpose of considering your suitability for employment, to run consumer investigative report (background check), to verify your identity, to populate and to administer employment-related documents for your employment, payroll, withholding, employee benefits, and/or your eligibility to work in the United States. We also collect information in order to: comply with federal and state laws and requirements; process and transmit payroll, taxes and withholding; collect and record your hours worked/attendance; submit worker's compensation claims; administer private and government employee health

and other benefit programs; engage in performance management and evaluations for discipline and/or promotions; conduct workplace investigations; grant access to secured company systems, devices and locations; implement electronic security measures; consider you for transfers to other affiliated entities; evaluate potential buy/sells of the dealership assets; apply and maintain various forms of insurance; collect and analyze worker data and benchmarks, conduct video, telephone and/or internet usage surveillance; and, otherwise conduct lawful business-related activities.

Category 4: Historical Personal and Family Identity Information Provided By You Through Self-Disclosure. Applicants for employment, new hires and existing employees are asked to provide information from Categories 1 to 3, as well as additional historical information about you, your education, your work experience, your skills, your military service and, if applicable, name and contact information your family, references, past supervisors and/or personal contacts. This information comes either directly from you, for instance, from your employment application and other employment-related documents you will out. We collect this information for various reasons, all associated with a valid business purpose. For example, Historical Personal and Family Identity Information Provided By You Through Self-Disclosure is collected for the purpose of considering your suitability for employment, to run consumer investigative report (background check), to verify your identity, to check your references, to populate and to administer employment-related documents for your employment, payroll, withholding, employee benefits, and/or your eligibility to work in the United States.

Category 5: Cookies and Other Computer Tracking Information. If you visit our Internet website, and/or our employment application or human resources management system, we may collect certain information about your Internet usage and your machine's identity and/or IP address. We collect this information for various reasons, all associated with a valid business purpose. For example, Cookies and Other Computer Tracking Information is collected for the purpose of permitting you access to our online employment application, to set up and provide access for you to HotlinkHR, our human resources management system, to verify your identity, to carry out our security measures to protect private information and/or to operate our computer systems or the computer systems of our service providers.

Category 6: Audio, Electronic Images and Electronic Information. If you enter the dealership premises and/or facility we may collect audio and video imaging of your activities while on the premises, including internet and network usage, and customer pay points throughout the store. We collect this information for the protection of our property, our customers and/or employees. We may use this information for law enforcement purposes and/or to investigate misconduct and/or crimes committed on the premises. We may also use this information for personnel matters, such as discipline and/or discharge.

Category 7: Inferences Drawn From Categories 1 Through 6 Above. For all information provided and/or obtained from Categories 1 through 6 above, we may draw inferences from such information to create a profile, summary and/or record of your performance, abilities, aptitude and/or general characteristics. We use this information for general employment

purposes, such as consideration for promotions and/or job positions and all the reasons set forth in Categories 1 through 6 above.

#### We Respect Your Privacy—We Limit Access And We Don't Sell Your Data to Anyone

Since some of the information we gather is not private and is not publicly available, we take great care to ensure that this information is kept safe from unauthorized access, and we would never share the information in violation of any regulation or law.

Because we respect your privacy and values your trust, the only employees or companies who can access your private personal information are those who use it to service your personnel needs and/or the needs of our customers. We diligently maintain physical, electronic and procedural safeguards that comply with applicable federal and state standards to guard your private personal information and to assist us in preventing unauthorized access to that information. We never sell your data to anyone.

#### **How We Share Information**

#### 1. Sharing Information with Our Company Affiliates

From time to time, for employment and general business purposes, such as to consider applicants for employment at our company or any of our Affiliates, to manage our personnel records, benefits and/or insurance coverage, or to permit requests for transfers between our Affiliates, we do share certain information with companies with whom we share any common ownership and/or control ("Affiliates"). The information we share might come from your employment application (for instance, your name, address and telephone number, etc.) or from other employment-related documents as outlined in Categories 1 to 6 above. We do not sell our Affiliates your data and do not allow the Affiliates to sell your data or use your data to market to you. You are not permitted to limit the sharing of this data. Our Affiliates are:

## 2. Sharing Information with Our Business Partners (Non-Affiliates)

From time to time, for employment and general business purposes, such as to manage our personnel records, benefits and/or insurance coverage, we do share certain information with companies with whom we do business and specifically who provide employment related or insurance related services to our business or our employees (Business Partners)—e.g., our benefits provider, payroll company, management staff, insurance companies and our electronic human resource management provider. The information we share might come from your employment application (for instance, your name, address and telephone number, etc.) or from other employment-related documents as outlined in Categories 1 to 6 above.

These Business Partners are Non-Affiliates--that is, they are companies that are not related by common ownership or control with our company. These companies may include financial service providers such as banks, finance companies, insurance companies, and non-financial companies such as automobile manufacturers and data processing companies, payroll company, benefits administrators. However, we never sell your information/data to anyone or any entity and we require that our business partners promise in writing not to misuse and/or sell your data to anyone, nor use your data to market to you.

The information we may provide them comes from the sources described above and might include your name, address, and phone number, among other information listed in Categories 1 to 6 herein.

We may also provide information to other companies that perform operational services related to your employment. The sharing of information with these types of companies is permitted by law. Such a company might include a company with whom we have a service agreement. This information also comes from the sources described above and might include name, address, and phone number, among other information.

These companies act on our behalf and, within the time required by law, will be required by our policy to be contractually obligated to keep the information that we provide to them confidential and to use the information only to provide the services we've asked them to perform for you or us. We do not sell your data to them. We do not allow those companies to sell your data or to use your data to market to you. You are not permitted to limit the sharing of this data.

Currently, our Non-Affiliates for human resources management purposes is HotlinkHR, Inc. (<a href="www.hrhotlink.com">www.hrhotlink.com</a>). For a complete list of Non-Affiliates once hired, please contact Human Resources or the General Manager.

#### Questions

If you have any questions for the information we collect and/or obtain regarding you or the security of such information, please contact Human Resources or the General Manager.