

Privacy Notice for Applicants and Independent Contractors

The purpose of this Privacy Notice for Applicants and Independent Contractors ("Privacy Notice") is to inform applicants and independent contractors of the American Automobile Association of Northern California, Nevada & Utah, AAA Arizona, Inc., and AAA MountainWest, Inc., and their affiliates and subsidiaries (collectively, "AAA", the "Company", or "we", "us", or "our") of the categories of Personal Information (as defined below) that we collect and process and the purposes for which we use such Personal Information. Please note that this Privacy Notice applies to current and former applicants and independent contractors ("you") and supplements the information contained in our Mountain West Group Privacy Policy ("Privacy Policy").

This Privacy Notice describes the categories of Personal Information we collect and the purposes for which we process that information in accordance with section 1798.100 (b) of the California Consumer Privacy Act (CCPA). The CCPA defines Personal Information as, *"categories of information that identifies, relates to, describes or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly to a particular individual or household"* ("Personal Information" or "PI").

As an applicant or independent contractor, you have the responsibility to make sure that the information you submit to us is accurate and up to date. Your privacy is important to us, and we will ensure that your Personal Information is kept confidential.

Please note that this notice may be updated periodically as required/needed in compliance with CCPA and all applicable regulations. This notice will be updated to reflect the latest changes; therefore, we suggest that you check it regularly.

This notice is meant to explain the Personal Information you may share with us as part of the application, recruitment, and retention process. This includes data that may be collected or produced by AAA and its subsidiaries and affiliates.

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CATEGORIES OF PERSONAL INFORMATION COLLECTED AND PURPOSE FOR COLLECTION:

This notice is meant to explain the Personal Information you may share with us as part of the application, recruitment, procurement, and retention process. This includes data that may be collected or produced by AAA and its subsidiaries and affiliates as well.

We may collect and use the following categories of Personal Information about you:

Categories of <i>Sensitive</i> Personal Information Collected:	How We Use the <i>Sensitive</i> Personal Information:
National Identification Information including: Social security number, citizenship, government identification number, passport information, and I-9 information	<ul style="list-style-type: none">• Conducting reference and background checks (if applicable, in case of job offer)• Verifying work eligibility and suitability for certain jobs or benefits (to the extent permitted or required by law)
EEOC Diversity Information including: Racial and ethnic origin, disability status, sexual orientation, gender, veteran status	<ul style="list-style-type: none">• Promoting diversity in the workplace via equal opportunity employment which may require the processing of sensitive information such as disability status, including the maintenance and monitoring of EEO program via federally mandated EEO reporting.
Health and Disability Records including: Disability information, workers compensation records, and medical notes	<ul style="list-style-type: none">• Addressing legal obligations, such as adjustments required to assist job performance or to provide reasonable accommodation
Biometrics including: Fingerprints, facial recognition, retinal scans, voice recognition, and digital signatures	<ul style="list-style-type: none">• Identity verification• Granting authorized employees access to internal systems and facilities• Ensuring adequate staffing levels and monitoring attendance

The following explains the categories of *Other Personal Information* that we may collect about you and the purposes for collection:

Categories of Personal Information Collected:	How We Use the Personal Information:
<p>Contact Information:</p> <p>First and last name, aliases, current address, previous addresses, work email addresses, personal email addresses, home phone numbers, mobile phone numbers, and emergency contact information</p>	<ul style="list-style-type: none"> Communicating with job applicants and candidates during the hiring and onboarding process, as well as in the hiring of independent contractors Identity verification
<p>New Hire/Onboarding Paperwork:</p> <p>Resumes, job applications (which may include Sensitive PI such as SSN and driver's license information), background checks, IRS Forms W-4 (withholding), etc.</p>	<ul style="list-style-type: none"> Evaluating candidate skills, strengths, and experience against AAA available job opportunities, or work needed for a particular project. Conducting reference and background checks (if applicable, in case of job offer) Communicating with job applicants and candidates during the hiring and onboarding process Promoting diversity in the workplace via equal opportunity employment which may require the processing of sensitive information such as disability status, including the maintenance and monitoring of EEO program via federally mandated EEO reporting. Identity verification Onboarding process
<p>Job-related Information and Qualifications:</p> <p>Current and previous employers, level of education completed, name of high school, degrees earned, name of university or trade schools, social media accounts, license information, time card information, time off information, referrals, and any other information you choose to provide in your resumes and/or applications, such as hobbies and interests</p>	<ul style="list-style-type: none"> Evaluating candidate skills, strengths, and experience against available job opportunities Evaluating employee personal and professional development, including job performance Evaluating independent contractors' professional skills and experience to support a specific project or work.
<p>Age and Birth Information:</p>	<ul style="list-style-type: none"> Verifying work eligibility (e.g., child labor laws)

Age, date of birth, place of birth	<ul style="list-style-type: none"> • Conducting reference and background checks (if applicable, in case of job offer)
<p>Benefits Information:</p> <p>Benefits history, FMLA certification, ADA paperwork, military leave, jury duty, and other qualifying life events</p>	<ul style="list-style-type: none"> • Administering any statutory or other benefits to which employees may be entitled (such as administration of benefits, administration of medical leaves of absence, compliance with workers' compensation laws, and accommodations under the Americans with Disabilities Act and/or state laws) • Verifying work eligibility and suitability for certain jobs or benefits (to the extent permitted or required by law) • Addressing legal obligations to employees, such as adjustments required to assist job performance
<p>Results of Background Checks and Screening:</p> <p>Criminal records, sex offender status, driving license status validation, and pre-employment drug screen results.</p> <p>* If applicant applies for a job that requires driving a company vehicle, then a motor vehicle record (MVR) check will be conducted</p>	<ul style="list-style-type: none"> • Conducting reference and background checks (if applicable, in case of job offer or selection of an independent contractor to work on a specific project) • Creating and managing employee records • Verifying work eligibility and suitability for certain jobs or benefits (to the extent permitted or required by law) • For health and safety purposes, including: to address our legal obligations in relation to health and safety in the workplace and to protect the health and safety of employees and third parties. • To determine if a prospective employee or independent contractor uses illicit substances or abuses prescription medication. • MVR checks conducted to ensure that candidates do not have a history of dangerous behavior behind the wheel.

WHY WE SHARE YOUR INFORMATION:

For External Processing:

- We will share and/or may have shared in the preceding 12 months your Personal Information outside of AAA with our affiliates and other trusted businesses for external services. However, this process is based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.
- For example, your Personal Information may be shared when we use a third-party company (such as Sterling) to perform a background check on a candidate.

For Legal Reasons:

- We will share and/or may have shared Personal Information outside of AAA if we have legitimate reason to believe that access, use, retention, or disclosure of the information is reasonably necessary to:
 - Meet any applicable law, regulation, legal process, or enforceable government demand.
 - Conduct investigations of potential violations.
 - Detect, prevent, or otherwise address fraud, security, or technical issues.
 - We might also share data as a means of safeguarding against harm to the rights, property, or safety of AAA, our consumers, or the public (to the extent permitted or required by law).

YOUR PRIVACY RIGHTS UNDER THE CCPA:

Your Right to Know:

Under CCPA, you have the right to **know**.

- The right to a disclosure explaining how the Company collects and handles an individual's Personal Information which is satisfied with this *Privacy Notice*.
- The right to copies of "*specific pieces of Personal Information*."
 - In addition to Personal Information collected from you directly, this also includes PI created by the Company on your behalf and;
 - Personal Information collected about you from third parties. For example, social media activity.

Your Right to Delete:

Under CCPA, you may have the right to **delete** Personal Information that the Company has collected. The right to delete is subject to the exceptions identified below. The complete list of exceptions to the right to delete can be found in the CCPA and in our Privacy Policy.

- The right to delete does not apply to Personal Information that we have created about you or received from sources other than you, in connection with your role as an applicant or independent contractor.

- A request to delete may not be fulfilled if the retention of the data is necessary to comply with other laws applicable to us. In these cases, we may need to retain the data for at least the duration of the data retention period.
- A request to delete may not be fulfilled if deleting the data would prevent us from exercising or defending legal claims.

Your Right to Correct:

Under CCPA, you have the right to correct inaccurate Personal Information. The right to correct is limited to objectively false information only.

For example, you have the right to update your address if you have moved.

Your Right to Right to Opt-Out of the Sale or Sharing of your PI:

Under CCPA, you have the right to opt out of the sale or sharing of Personal Information.

- The CCPA defines “Sale” as, a transfer of Personal Information “by the business to a *third party*.”
- The CCPA defines “Sharing” as “communicating orally, in writing, or by electronic or other means, a consumer’s Personal Information . . . to a *third party* for cross-context behavioral advertising, whether or not for monetary or other valuable consideration.”
- The CCPA defines “Third Party” as a person who is **not**:
 - (1) The employer (us) to whom the Personal Information was provided;
 - (2) One of our service providers; or
 - (3) One of our contractors.
- Therefore, when we transfer your Personal Information to service providers such as Workday or to our Benefits Partners, or to process your payroll for to pay an independent contractor, this is *not* considered a “sale.” In addition, when we transfer your Personal Information to contractors, this will not be considered a sale.
- We do not sell your Personal Information in connection with your role as an applicant or independent contractor.

Your Right to Limit Use and Disclosure of Sensitive Personal Information:

Under CCPA, you have the right to limit the use and disclosure of **Sensitive Personal Information**. We do not use Sensitive Personal Information to make inferences about your characteristics.

We will only collect the Sensitive Personal Information that is necessary for legitimate business purposes, and we will only use your Sensitive Personal Information for its intended purpose. For example, collecting and using your Social Security Number to verify your identity and work authorization among other business purposes.

The types of Sensitive Personal Information we collect can be found in this Privacy Notice. The fulfillment of this request to limit the use or disclosure of Sensitive Personal Information is subject to us receiving a *verifiable* request from you and it is also subject to the exceptions outlined in the CCPA.

Your Right to a Private Right of Action:

You have a Private Right of Action in the event of a data breach, *if* the data breach is a result of our failure to “implement and maintain reasonable security procedures and practices.”

A complete list of the types of data for which data breach litigation is permitted can be found in the CCPA.

Questions

If you have any questions about this Privacy Notice, or if you would like to request it in another format, please contact your HR Partner, or visit askhr.aaa.com