# California Applicant Privacy Notice

(effective January 1, 2020)

This California Applicant Privacy Notice ("Applicant Privacy Notice") describes the types of personal information that we may collect about our California job applicants through the Global Lending Services online recruitment system and careers pages which link to this Applicant Privacy Notice (collectively, the "Recruitment System") and how it may be used. This Applicant Privacy Notice applies to personal information provided by applicants through the Recruitment System as well as provided by third party agencies and recruiters on behalf of applicants. This Applicant Privacy Notice does **not** describe how such third-party agencies and/or recruiters may handle your personal information for their own purposes.

This Applicant Privacy Notice describes the practices of Global Lending Services, to which you are applying for a job opening (collectively, "Global Lending Services," "we," "us" or "our").

#### What Personal Information We Obtain

If you choose to apply for a job opening or create a profile in the Recruitment System, we obtain your personal information in connection with your application or profile creation. This information may vary depending on the requirements of a specific position and Global Lending Services division and may include:

- Username and password for your Recruitment System account.
- Contact information (e.g., your name, home address, email address or phone number).
- Information contained in your resume or CV, and other documents related to the application or recruitment process (e.g., cover letter, transcripts or certifications).
- Information contained in your employment or social media site profile (e.g., LinkedIn, Monster), when you choose to share this with us.
- References' contact information (please keep in mind that it is your responsibility to obtain consent before providing us with the personal information of others).
- Information about your visa status and authorization to work in the relevant jurisdiction.

- Demographic information including age and gender, and where applicable and in accordance with applicable law, your ethnicity, disability or veteran status.
- Voicemails, e-mails, correspondence, documents, and other work product and communications created, stored or transmitted using our networks, applications, devices, computers or communications equipment.
- Information about your relationship with the Global Lending Services, including prior work experience or association you may have with any current or former Global Lending Services employees.
- With your permission or as permitted by applicable law, information obtained through background checks.
- Other information you may choose to submit to us in connection with your application or profile creation.

We may obtain this information directly from you or from third party agencies and recruiters if they submit an application on your behalf. If you are a third party agency, recruiter or other agent submitting information on behalf of an applicant, it is your responsibility to describe your privacy practices and obtain any requisite consent from the applicant before providing their information to us.

#### Information Automatically Collected

In addition, we and the cloud provider of the Recruitment System (Applicant Stack) may automatically collect or log certain information about visits to and usage of the Recruitment System, using technologies such as cookies, server logs and web beacons. This information may include your Internet Protocol (IP) Address, technical information about browsers and devices used to access the Recruitment System, and information about crashes or other technical issues. This information is generally aggregated to analyze and improve the quality and reliability of the Recruitment System. This information is not used to make employment-related decisions. At this time, the Recruitment System is not designed to respond to "Do Not Track" signals or similar mechanisms from browsers as there is no common, industry-accepted standard for doing so.

#### **How We Use Your Personal Information**

We use your personal information obtained through the Recruitment System for the purposes of carrying out our application tracking and recruitment activities, including:

Creating and managing your Recruitment System account and job applications.

- Assessing your skills, qualifications and interests against the position applied for or other positions within Global Lending Services.
- Verifying your information, including through reference checks.
- Communicating with you about the application and recruitment process, or sending you
  information about other positions within Global Lending Services which may be of
  interest to you.
- Operating, evaluating and improving the Recruitment System, our application tracking and recruitment activities and communications (this includes analyzing our job applicant base and Talent Pool, analyzing our hiring practices or trends, identifying qualifications or skills shortages, and using information to match candidates and potential opportunities).
- Detecting, preventing and responding to fraud or potentially illegal activities, misuse of the Recruitment System, intellectual property infringement or other violations of law, this Privacy Notice or other Global Lending Services policies.
- Performing audits, assessments, maintenance and testing or troubleshooting activities related to the Recruitment System.
- Backing up our systems (including for disaster recovery purposes) and enhancing the overall security of the Recruitment System.
- Complying with and enforcing applicable legal requirements (including legal processes such as court orders, warrants or subpoenas) and fulfilling our contractual obligations.
- Administration of our applications, software, and systems, including detection, prevention and investigation of security issues, outages, cyber and phishing attacks, fraud and/or other malicious, criminal or illegal activity.
- Other purposes as part of our business activities when reasonably required by us.
- Such other purposes as we may disclose to you from time to time.

If you accept a job offer with Global Lending Services, the information obtained through the Recruitment System and application process will become part of your employment record subject to applicable law.

With Whom We Share Your Personal Information

Category of Personal Information	Categories of Sources	Business or Commercial Purpose for Collecting	Categories of Third Parties We Share Personal Information With
§1798.140(o)(1)(A) which include: (i) your contact information and other identifiers (e.g., name, mailing address, phone number, email address, employee identification number, social security number and other forms of government identification); (ii) online identifiers (e.g., Internet Protocol (IP) address, device identifiers); and/or (iii) contact information you share about others such as references, beneficiaries, or emergency contacts (e.g., name, email address, phone number)	<ul> <li>Background check providers, if applicable</li> <li>Publicly available sources</li> </ul>	Please refer to the purposes described in the "How We Use Your Personal Information" section above	<ul> <li>Service providers that perform services on our behalf, such as reference and background check providers (to the extent permitted by applicable law)</li> <li>Third parties in connection with conducting educational or reference checks</li> <li>Our business partners, such as entities or recruiting agencies with which you may interact with respect to Global Lending Services</li> <li>Government and regulatory entities to the extent required by law, audit, or subpoena</li> </ul>
§1798.140(o)(1)(I) which include professional or employment – related information (e.g., information shared on the individual's resume, application or other documents, visa status)	recruiters on your behalf  Background check providers, if applicable  Publicly available sources	Please refer to the purposes described in the "How We Use Your Personal Information" section above	<ul> <li>Service providers that perform services on our behalf, such as reference and background check companies</li> <li>Third parties in connection with conducting educational or reference checks</li> <li>Government and regulatory entities to the extent required by law, audit, or subpoena</li> <li>Third parties in connection with litigation, subpoenas, or other legal process (e.g. opposing counsel or the court)</li> </ul>

## **Changes to This Applicant Privacy Notice**

This Applicant Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our personal information practices and/or applicable laws.

### **Contact Us**

If you have any questions about this Applicant Privacy Notice, please contact us at <a href="https://glsauto.com/contact-us.html">https://glsauto.com/contact-us.html</a>.