

California Workforce Privacy Notice and Disclosure

(effective June 27, 2023)

This California Workforce Privacy Notice and Disclosure (“Workforce CCPA Disclosure”) explains how Global Lending Services LLC and its U.S. affiliates (collectively, “GLS,” “we,” “us,” or “our”) collect, use, and disclose personal information subject to the California Consumer Privacy Act (“CCPA”), its amendments, and related regulations in the context of a person’s role as a job applicant, employee, associate, contractor, or other member of the GLS workforce (“Workforce Member”). It also describes the privacy rights of California residents under the CCPA and how they can exercise those rights.

This Applicant Privacy Notice does **not** describe how third-party agencies and/or recruiters acting on your behalf may handle your personal information for their own purposes.

We do not sell or share Workforce Members’ information for cross-context behavioral advertising.

This Workforce CCPA Disclosure applies solely to California residents and supplements any other privacy policies or notices applicable to the GLS services that you visit or use.

WHAT PERSONAL INFORMATION IS COVERED BY THE CCPA?

Under the CCPA, “personal information” is information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household. It does not include publicly available information or information that has been aggregated or de-identified.

The CCPA does not apply to certain information, such as information subject to the Health Insurance Portability and Accountability Act, the Gramm-Leach-Bliley Act, the Fair Credit Reporting Act, and certain other state or federal privacy laws. This Workforce CCPA Disclosure also does not apply to information that we collect outside the context of a person’s role as a Workforce Member. For more information about how we collect, use, and disclose personal information of California residents in other contexts, please review our non-Workforce [Privacy Policy](#)’s notice and disclosure for California residents.

CATEGORIES OF PERSONAL INFORMATION WE COLLECT

In the past 12 months, we have collected the following categories of personal information, as defined in the CCPA, relating to Workforce members who are California

residents. The categories of personal information that we collect, use, and disclose about a Workforce Member who is a California resident will depend on our specific relationship or interaction with that individual. The examples provided in each category below are for illustration only.

CCPA CATEGORIES	EXAMPLES
Identifiers	Name, address, email address, Social Security number, driver's license, account login credentials, or other similar identifiers
Contact, health, insurance, financial, or other personal information as defined in the California Customer Records Act, Cal. Civ. Code § 1798.80	Home address, health and vaccine information, insurance details, direct deposit and other financial information
Professional or employment-related information	Resume, CV, current and past employers, titles, years of employment, work history, performance evaluations, payroll, compensation info, survey responses, visa status, work authorization, information in your employment or career website profile (e.g., LinkedIn, Monster), prior work experience or associations you may have with GLS or its current or former workforce members
Internet or similar network activity information	Browsing history, IP address, browser and device information, search history, interaction with websites, and the contents of any voicemails, calls, documents, mail, email, text messages, and other communications and work product created, stored or transmitted using our networks, applications, devices, computers or communications equipment
Audio, electronic, or similar information	Call and screen recordings, audiovideo recordings

CCPA CATEGORIES**EXAMPLES**

Protected classifications under California or federal law

Age, marital status, sex, and veteran or military status

Commercial information

Information about past transactions or purchases

Biometric information

Physical or behavioral characteristics that may be used to establish identity, for example for authentication or fraud prevention purposes

Geolocation data

ID badge swipe records, GLS device logins, network connections

Education information

Education records, transcripts, graduation dates

Inferences drawn from your personal information

Inferences concerning an individual's preferences, abilities, aptitudes, and characteristics

While some of the information that we collect may be considered sensitive personal information, GLS uses and discloses sensitive personal information only for those purposes that are authorized by law. For example, GLS may process your sensitive personal information in order to verify your identity and information. California law does not afford you rights to limit the use or disclosure of your sensitive personal information for these purposes.

The personal information we collect will be retained for as long as reasonably necessary for the purposes set out in this policy and consistent with our retention policies, in accordance with applicable laws. When determining these retention policies, we take into account the length of time personal information is required to be retained to provide the services; satisfy legal and compliance obligations and for audit purposes; address any complaints regarding the services; and defend or bring potential legal claims.

CATEGORIES OF SOURCES OF PERSONAL INFORMATION

In the past 12 months, we have collected personal information relating to Workforce Members who are California residents from the following sources:

SOURCES	ILLUSTRATIVE EXAMPLES
Directly from you	Information submitted on a job application, when enrolling in benefits, while performing your job duties, or in response to surveys or other requests for information
Affiliates	Companies related by common ownership or control to GLS
Service providers	Software providers, marketing companies, communication services, fraud prevention services, data analytics providers, data providers
Third parties that you have authorized or directed to share information with us	Authorized agents, third-party agencies, recruiters, or others on your behalf

PURPOSES FOR WHICH WE USE PERSONAL INFORMATION

We may use personal information relating to Workforce Members who are California residents for one or more of the following business purposes:

- Evaluating employment applications and employee performance
- Providing and maintaining our Workforce Member related services
- Conducting background and reference checks
- Protecting against security risks
- Advertising and marketing
- Conducting analytics and research
- Operating, maintaining, evaluating, and improving our facilities, systems, and infrastructure
- Improving our Workforce Member related services

- Carrying out our legal and business purposes, such as complying with federal, state, or local laws, responding to civil, criminal, or regulatory lawsuits, subpoenas, or investigations, exercising our rights or defending against legal claims, fulfilling our contractual obligations, resolving complaints and disputes, performing compliance activities, performing institutional risk control, and otherwise operating, managing, and maintaining our business
- Creating aggregated and de-identified information
- Other purposes as part of our business activities when reasonably required by us
- As otherwise disclosed to you at or before the point of collecting your personal information

We may also use personal information relating to Workforce Members who are California residents for one or more of the specific “business purposes” listed in the CCPA:

- Auditing related to a Workforce Member
- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity
- Debugging to identify and repair errors that impair existing intended functionality
- Short-term, transient use
- Performing services on behalf of GLS or its service providers, including maintaining or servicing Workforce Member’s accounts, communicating with and providing services to Workforce Members, processing or fulfilling orders and transactions, verifying Workforce Members’ information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services on behalf of GLS or its service providers
- Undertaking internal research for technological development and demonstration
- Undertaking activities to improve, update, verify or maintain the quality or safety of a service that is owned or controlled by GLS.

If a person accepts a job offer from Global Lending Services, the information obtained through the application process and systems will become part of that person’s employment record, subject to applicable law.

DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

In the past 12 months, we have disclosed each of the above-listed categories of personal information concerning California residents for our business purposes to one or more of the following categories of third parties:

THIRD PARTIES**ILLUSTRATIVE EXAMPLES**

Affiliates

Companies related by common ownership or control to GLS

Business partners

Payment processors, merchants, or other financial institutions

Service providers

Benefit providers, software providers, recruiting firms working on our behalf, reference and background check providers, communication services, fraud prevention services, or data analytics providers

Other third parties with your consent or as necessary to provide our products and services

Family members, payment processors, financial institutions

Government entities and others with whom we share information for legal or necessary purposes

Regulatory and law enforcement agencies

In the past 12 months, we have not disclosed personal information relating to Workforce Members who are California residents in any manner that we consider a sale or sharing for cross-context behavioral advertising within the meaning of the CCPA.

RIGHTS UNDER THE CCPA

If you are a California resident, you may request that we disclose to you the following information:

- The categories of personal information described above that we have collected about you and the categories of sources from which we collected such personal information
- The business or commercial purposes for collecting or sharing such personal information, however, GLS does not share that information
- The categories of personal information about you that we have disclosed to or shared with third parties for a business purpose and the categories of third parties to whom we have disclosed or shared such personal information, however, GLS does not share that information
- The specific pieces (e.g., copies) of personal information we have collected about you

California residents also have the right to submit a request for deletion or correction of their personal information under certain circumstances, although in some instances, we may decline to honor your request. For example, we may decline to honor your request if we cannot verify your identity or confirm that the personal information that we maintain relates to you, or if we cannot verify that you have the authority to make a request on behalf of another individual. In other instances, we may decline to honor your request where an exception applies, such as where the disclosure of personal information would adversely affect the rights and freedoms of another consumer or where the personal information that we maintain about you is not subject to the CCPA. You have the right to be free from unlawful discrimination for exercising your rights under the CCPA.

If you are a California resident and would like to exercise your rights to know, delete, or correct your personal information as described above, you can submit a request online at <https://glsauto.com/contact.html>, by emailing your request to privacy@glsauto.com, or by calling us at 866-464-0269. To protect your privacy and maintain the security of your account, requesters will be required to authenticate your identity by providing your full name and two or more of the following; your address on file, the last four digits of your social security number, and your employee or applicant number. Additionally, if you ask us to provide you with specific pieces of personal information, we may request that you complete and return a signed declaration, under penalty of perjury, that you are the consumer whose personal information is the subject of the request.

To designate an authorized agent to make these requests, we may require you to provide written permission, which may include submitting a copy of the California Secretary of State registration authorizing the designated agent to act on your behalf.

CHANGES TO THIS CALIFORNIA CONSUMER PRIVACY ACT DISCLOSURE

We may change or update this Workforce CCPA Disclosure in the future. When we do, we will post the revised Disclosure in job postings and on our internal workforce website. This CCPA Disclosure was last updated and became effective on the date posted at the top of this page.