

# Edmunds.com, Inc. California Careers Privacy Statement

Updated as of September 30, 2024

This Edmund.com, Inc. Careers Privacy Statement (“**Privacy Statement**”) applies to California residents who are former, current and potential employees and individual contractors (“**California Associates**”) of Edmunds.com, Inc. (“**Edmunds**”), and provides information regarding Edmunds’ collection, use and disclosure of HR-Related Personal Information (defined below) and the rights of California Associates to make privacy requests regarding their HR-Related Personal Information.

## Definitions

“**CCPA/CPRA**” means the California Consumer Privacy Act and regulations as amended by the California Privacy Rights Act and regulations.

“**HR-Related Personal Information**” means the Personal Information, including Sensitive Personal Information, obtained by or on behalf of Edmunds in connection with California Associates’ potential or actual employment or engagement by Edmunds.

“**Personal Information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household as further defined under Section 1798.140(v) of the California Civil Code.

“**Sensitive Personal Information**” means:

- Personal Information that reveals an individual’s social security or driver’s license, state identification card or passport number;
- Personal Information that reveals an individual’s account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password or credentials allowing access to an account;
- Personal Information that reveals an individual’s precise geolocation;
- Contents of an individual’s mail, email and text messages (excluding messages sent through or posted in an Edmunds’ account, system or network or messages where Edmunds is an intended recipient);
- Personal Information that reveals an individual’s racial or ethnic origin, religious or philosophical beliefs or union membership;
- Personal Information that reveals an individual’s genetic data;
- The processing of biometric information for the purpose of uniquely identifying an individual;
- Personal Information collected and analyzed concerning an individual’s health; and
- Personal Information collected and analyzed concerning an individual’s sex life or sexual orientation.

Other capitalized terms used in this Privacy Statement shall have the meanings given to them herein.

## Collection of HR-Related Personal Information

The types of HR-Related Personal Information that Edmunds may collect include, but are not limited to:

**Identifiers**, such as your name, home and business addresses, telephone numbers, email addresses, device identifiers, usernames, emergency and similar contact information, driver's license number, social security number, tax identification number, passport number/national ID number, and other government identifiers.

**Financial information**, such as IRS W-4 and other form data, withholdings and other tax information, bank and financial account numbers, and other banking details.

**Demographics**, such as gender, age (including date of birth), marital status, military service, disability status, race, and ethnic origin.

**Work eligibility information**, such as work authorization, immigration and visa status.

**Professional or employment-related information**, such as job title/position, work location and preference, employment-related contracts, dates of service, positions held, CV/résumé, academic/professional qualifications, professional and other work-related licenses, permits and certifications, security clearances, performance and disciplinary records, travel and expenses, investigations, complaints, time card and attendance records, motor vehicle and driving records, criminal records data, credit check information and other information relating to background checks, and reference information.

**Internet or other electronic network activity and communication information** associated with Edmunds' accounts, equipment, networks and systems, such as IP addresses, log files, electronic communications and files, network connections, Slack and other messages, login credentials and survey responses.

**Geolocation data**, such as information associated with the devices or equipment you use in the course of employment or while using Edmunds' vehicles.

**Videos and photos**, such as photos for identification purposes and meeting videos.

**Meeting recordings and other communications** for recordkeeping, training and other business purposes.

**Benefits information**, such as benefits enrollment and dependent and beneficiary information.

**Education information**, such as degrees or certifications held, trainings and development programs attended, and assessments.

## **Sensitive Information**

**Inferences** drawn from the types of HR-Related Personal Information listed above.

## **Sources of HR-Related Personal Information**

Edmunds obtains HR-Related Personal Information from California Associates, their references, recruiters, staffing agencies, benefit providers, and professional and certification organizations. Edmunds may obtain or receive HR-Related Personal Information from other third parties as permitted by law, such as

any HR-Related Personal Information that may be contained in a California Associate's motor vehicle record, criminal or other background checks or be provided by federal, state or local government agencies and their contractors. Edmunds also collects HR-Related Personal Information regarding California Associates' use of and access to Edmunds resources and facilities.

## **Use and Disclosure of HR-Related Personal Information**

Edmunds may use and disclose all categories of HR-Related Personal Information for the following purposes:

- Processing applications for employment or engagement and assessing qualifications for a task, position or job;
- Record keeping and administration purposes (including payroll, tax reporting, leave and benefits administration);
- Communicating with California Associates and their dependents and beneficiaries and/or third parties;
- Accounting, auditing, workforce and business management and planning;
- Complying with applicable law and contractual obligations, and responding to subpoenas and requests from law enforcement and government agencies;
- Complying with health and safety obligations and maintaining the safety and security of Edmunds' facilities, assets, employees, contractors, clients, vendors and visitors;
- Developing and providing education, training and career development;
- Conducting performance reviews and determining performance requirements;
- Investigating, processing and handling California Associate and other complaints and claims, and gathering information for disciplinary actions or terminations;
- Developing policies and procedures, and enforcing Edmunds' policies, legal and contractual rights;
- Developing internal tools;
- Entering into a corporate transaction, such as a proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Edmunds' businesses, assets, or stock (including in connection with any bankruptcy or similar proceedings);
- Protecting the rights, privacy, safety and/or property of Edmunds and its employees, contractors, vendors, guests and clients;
- Protecting against fraud or illegal activity;
- Operating and managing technology and communication network, systems and accounts and ensuring system, account, network and information security, including preventing unauthorized access to computer and electronic communications systems and preventing malicious software distribution; and
- Other purposes allowed under applicable law.

Edmunds' parent company, CarMax, Inc., and its other affiliates, may have access to and use all categories of HR-Related Personal Information for the above purposes. In addition, Edmunds may disclose all categories of HR-Related Personal Information for the business purposes set forth herein to Edmunds' service providers, benefits providers and consultants and advisors. Edmunds may disclose HR-Related Personal Information to law enforcement, government authorities and other third parties where Edmunds believes disclosure is necessary to comply with a legal or contractual obligation or where we determine that disclosure is reasonably necessary to protect the rights and interests of California Associates, Edmunds and/or others. Edmunds may disclose personal information to potential transaction partners

and related third parties in connection with a potential merger or acquisition or sale or transfer all or a portion of Edmunds' assets or business.

Edmunds does not sell or "Share" (which is defined under the CCPA/CPRA to mean sharing for cross context behavioral advertising purposes) any HR-Related Personal Information. In addition, Edmunds does not use or disclose any HR-Related Personal Information that is considered Sensitive Personal Information for purposes other than those expressly permitted under California law and does not use or disclose such information for the purpose of inferring an individual's characteristics. Hence, the rights to opt-out from the sale or "Sharing" of Personal Information and limit the processing of Sensitive Personal Information under the CCPA/CPRA are not applicable.

Edmunds retains HR-Related Personal Information that Edmunds collects for as long as reasonably necessary to achieve the purposes set forth in this Privacy Notice or at the point of collection. The length of retention may vary depending on the existence of an ongoing relationship between California Associates and Edmunds.

Edmunds will not discriminate against California Associates because they exercised any of their rights under the CCPA/CPRA.

## CCPA/CPRA Privacy Rights

Subject to certain limits under the CCPA/CPRA, California Associates have the right to make the following requests regarding their HR-Related Personal Information:

- **Deletion:** California Associates may request that their HR-Related Personal Information maintained by Edmunds be deleted by Edmunds (a "**Deletion Request**"); however, Edmunds is required or permitted to retain certain HR-Related Personal Information for the purposes allowed under the law.
- **Correction:** California Associates may request that incorrect HR-Related Personal Information maintained by Edmunds be corrected (a "**Correction Request**").
- **Reporting and Access:** California Associates may request Edmunds to provide reporting about its collection and handling of their HR-Related Personal Information (a "**Reporting Request**") and/or copies of specific pieces of their HR-Related Personal Information maintained by Edmunds in a readily usable format (an "**Access Request**") during the prior 12-month period. California Associates may request the reporting and/or access be provided for a longer period, but the period beyond the prior 12 months will only apply to HR-Related Personal Information collected on or after January 1, 2022.

## Privacy Request Submission and Verification

California Associates may submit privacy requests online at [www.edmunds.com/data-privacy-request](http://www.edmunds.com/data-privacy-request) or by phone at 855-585-2033. A request must contain all the following information:

- The type of privacy request.
- The California Associate's first and last name, email address, phone number and full street address (including ZIP code).
- For Correction Requests, a description of the incorrect HR-Related Personal Information and the corrected HR-Related Personal Information. If the incorrect HR-Related Personal Information was

discovered due to a prior privacy request, the request should also reference to that prior request, including the request type and submission date.

When submitting a request online, a California Associate or his/her “Authorized Agent” (see below) must check the “Current or former Edmunds job applicants, employees or contractors” box for the request to apply to HR-Related Personal Information. When submitting a request by phone, a California Associate or his/her “Authorized Agent” must indicate that the request relates to a current or former Edmunds’ job applicant, employee or contractor for the request to apply to HR-Related Personal Information.

A California Associate may designate an “Authorized Agent” to submit privacy requests on his/her behalf. If a request is submitted by an Authorized Agent, the request must also contain the Authorized Agent’s first and last name, email address, phone number and full street address. A California Associate or his/her Authorized Agent must also provide Edmunds with a copy of a (a) valid power of attorney, or (b) written permission signed by the California Associate demonstrating that the Authorized Agent has been authorized to act on the California Associate’s behalf for privacy requests. A scanned copy of the power of attorney or signed written permission should be sent to [data-privacy-requests@edmunds.com](mailto:data-privacy-requests@edmunds.com). If the California Associate or his/her Authorized Agent prefers to send Edmunds a copy via U.S. Mail, he or she should send an email asking for mailing instructions to Edmunds at [data-privacy-requests@edmunds.com](mailto:data-privacy-requests@edmunds.com).

Edmunds must be able to verify a privacy request to be allowed to process it. If Edmunds sends messages to a California Associate’s phone and email asking the California Associate to verify his/her request, the California Associate must respond if he/she wants the request processed. Note that mobile phone numbers will receive a text message, and landlines will receive a call or voicemail message. California Associates may be asked to complete different verification method (such as verification through a LexisNexis or another third-party service) and/or provide additional information that can be used by Edmunds’ Employment Experience team to verify the request.

Once a request is verified, Edmunds will need to be able to find in its databases the Personal Information that was submitted with the request to be able to process it.

## **Changes to this Statement**

From time to time, Edmunds may change this Privacy Statement due to changes in the law and Edmunds’ practices. The revised Privacy Statement will be posted on the “Roadside Assistance” page in Confluence and on Edmunds’ Careers page at <https://www.edmunds.com/careers/>. California Associates may also request a copy by emailing [data-privacy-request@edmunds.com](mailto:data-privacy-request@edmunds.com).

## **Contact**

If you have questions about this Privacy Statement, please contact Edmunds’ General Counsel at [data-privacy-request@edmunds.com](mailto:data-privacy-request@edmunds.com).