

Edmunds.com, Inc. Careers Privacy Statement

This Edmund.com, Inc. Careers Privacy Statement (“**Privacy Statement**”) applies to former, current and potential employees and individual contractors (“**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 Associates who are residents of California to make privacy requests regarding their HR-Related Personal Information.

Other 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 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 an Edmunds’ account 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 herein shall have the meanings given to them below.

Collection of Personal Information

Edmunds collects the HR-Related Personal Information that Associates provide when applying for a position at Edmunds, such as:

- Name, street address, telephone number, email address and other contact information;

- The Personal Information contained in Associates' cover letters, resumes or other work history information provided to Edmunds;
- Professional and other work-related licenses, permits and certifications;
- Gender, race, ethnic origin, Veteran status, disability status and other similar information that is considered Personal Information; and
- Work authorization, immigration and/or citizenship status.

If an Associate is offered a position with Edmunds or Edmunds' hires or otherwise engages an Associate, Edmunds may collect additional HR-Related Personal Information, such as:

- Social Security Number, Tax Identification Number, bank and financial account numbers and other Personal Information necessary to process or administer payroll, fee payments, taxes (including tax reporting), expense reimbursements and benefits and/or conduct general personnel administration;
- Personal Information related to 401(k), health and welfare and other benefits (including dependent and beneficiary information);
- Marital status and beneficiary and dependent information;
- Emergency and other similar contact information;
- Security clearances;
- Driver's license number and other information, if any, needed to run motor vehicle records checks and comply with Edmunds' liability insurance requirements and authorized driving and other policies;
- Vehicle license plate numbers;
- Identifiers and other information necessary to process and check Form I-9s and other work authorizations and permits;
- Identifiers and other information needed to run criminal, motor vehicle, credit and other applicable background checks;
- Professional information;
- Gender, race, ethnic origin, Veteran status, disability status and other similar information that is considered Personal Information that Edmunds is required or permitted by law to collect;
- Health and other Personal Information provided as part of a request for leave or another accommodation;
- In response to COVID-19 or other disease outbreak, health and other information about potential exposure, symptoms, testing or diagnosis and vaccine status that Edmunds is required or permitted by law to collect in order to carry out its legal obligations and protect the health and safety of Edmunds' workforce, clients, vendors and visitors;
- Videos and photos;
- Recordings of meetings and other communications;
- Internet or other electronic network activity and information associated with use of Edmunds' equipment, technology systems, networks, applications and resources – such as IP addresses, log files, electronic communications and files, network connections and login credentials; and
- Performance evaluations and inferences that may be drawn from HR-Related Personal Information.

Edmunds may obtain or receive HR-Related Personal Information from third parties as permitted by law, such as any HR-Related Personal Information that may be contained an Associate's criminal or other background checks, and Personal Information provided by federal, state or local government agencies and their contractors.

Use of 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, leave and benefits administration);
- Communicating with 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, Associates, clients, vendors and visitors;
- Developing and providing education, training and career development;
- Conducting performance reviews and determining performance requirements;
- Investigating, processing and handling 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;
- 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 Associates, vendors, guests and clients;
- Protecting against fraud or illegal activity;
- Operating and managing technology and communicate systems and ensuring 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. 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.

CCPA/CPRA Privacy Rights

Subject to certain limits under the CCPA/CPRA, Associates who are residents of California ("**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 (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.
- **Appeal:** California Associates may appeal Edmunds' denial of, or inaction regarding, their privacy requests (an "**Appeal Request**").

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 retention may vary depending on the existence of an ongoing relationship between California Associates and us.

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

Privacy Request Submission and Verification

California Associates may submit privacy requests online at www.edmunds.com/data-privacy-request or by phone at 855-585-2033. A request must contain all of 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.
- For Appeal Requests, the reason for the appeal and a reference the prior privacy request that is the subject of the appeal, 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. 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.

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/>. Associates may also request a copy by emailing 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.