

Dealer Tire Family of Companies Employee and Applicant Privacy Policy

OVERVIEW

The Dealer Tire Family of Companies (“Dealer Tire”) is committed to the privacy and security of our employees and applicants Personal Information (as defined below). This Employee Privacy Policy (“Privacy Policy”) explains what types of Personal Information we may collect about our employees, job applicants, and candidates and contract workers, and how it may be used.

In this Privacy Policy the terms “Dealer Tire”, “we”, “us”, and “our” refers to Dealer Tire, LLC and its affiliates and subsidiaries globally, including but not limited to Sonsio, LLC.

While this Privacy Policy is intended to describe the broadest range of our information processing activities globally, those processing activities may be more limited in some jurisdictions based on the restrictions and requirements of their laws. For example, the laws of a particular state or country may limit the types of personal information we can collect or the manner in which we process that information. In those instances, we adjust our internal policies and practices to reflect the requirements of applicable law.

Please be aware that Dealer Tire’s various internal intranet sites (i.e. Collaborate, Workday, etc.) and its general websites, including www.dealertire.com and www.sonsio.com, may have separate privacy policies and terms of use that apply to their use. Any Personal Information of you collected in connection with your use of those intranet sites and/or websites are not subject to this Privacy Policy where a separate privacy policy is identified therein.

If you are unsure how or if this Privacy Policy applies to you, please contact Human Resources.

1. What is Personal Information?

“Personal Information”, also sometimes referred to as personally identifiable information, PII, personal data, or non-public personal information, means, for purposes of this Privacy Policy, any information that (i) directly and clearly identifies you as an individual, or (ii) can be used in combination with other information to identify you as an individual.

Personal information does not include such information if it is anonymous or if it has been rendered de-identified by removing personal identifiers.

Examples of Personal Information can include:

- An individual's name
- An individual's photograph and/or video image.
- Employee ID number.
- Home address.
- Home phone number.
- Personal email address.
- Names of family members.
- Date of birth.
- Geolocation Data.

2. What is Sensitive Personal Information?

Sensitive personal information is a subset of Personal Information that may be more sensitive in nature for the individual concerned. This often includes:

- Race and ethnic information.
- Sexual orientation.
- Political/religious beliefs.
- Social security or other taxpayer/government issued identification numbers.
- Financial information.
- Health or medical information.
- Criminal records.
- Motor Vehicle Records

3. How Personal Information is Collected; Third Party Services

Generally, we collect Personal Information directly from you in circumstances where you provide personal information through direct interaction with us (e.g., during the application process, onboarding process, signing up for direct deposit, enrolling in benefits or services, etc.). However, in some instances, the Personal Information we collect has been inferred about you based on other information you provide to us, through your interactions with us, or from third parties. Where permitted or required by applicable law or regulatory requirements, we may collect Personal Information about you without your knowledge or consent. In furtherance of our right to monitor the use of our facilities, equipment, computers, network, applications, software, vehicles, and similar assets/resources your Personal Information is also collected. This monitoring may include the use of CCTV cameras, vehicle dash cameras, and access control systems in and around our facilities and vehicles.

In some cases, you may provide your Personal Information to third party service providers with which Dealer Tire works. This could be, for example, a third-party

website where you can apply for a job, can take advantage of services or resources made available to you as an employee, as well as management of your time, expenses, and employee benefits. The use of these third-party websites may be governed by separate terms of use and privacy policies which are not under our control and are not subject to this Privacy Policy. Please contact such third parties for questions regarding their privacy practices. When we collect your personal information from third parties it is either because you have given us express permission to do so, your permission was implied by your actions (e.g., your use of third-party employee resources made available to you by us), or because you provided explicit or implicit permission to the third party to provide your Personal Information to us.

4. What Personal Information Do We Collect?

We collect and maintain different types of Personal Information about you. None of your Personal Information has ever been nor will it be sold to third parties by us. Personal Information we collect about you includes:

- Name, gender, home address and telephone number, date of birth, marital status, drivers' license, and employee identification number.
- Residency and work permit status, military status, nationality and passport information.
- Social security or other taxpayer/government identification number.
- Payroll information, banking details.
- Wage and benefit information.
- Retirement account information.
- Sick pay, Paid Time Off ("PTO"), retirement accounts, compensation plan information, insurance and other benefits information (including the gender, age, nationality and passport information for any spouse, minor children or other eligible dependents and beneficiaries).
- Your resume, cover letter, previous and/or relevant work experience or other experience, education, transcripts, or other information you provide to us in support of an application and/or the application and recruitment process, as well as information from interviews and phone-screenings you may have had, if any, including references and interview notes.
- Letters of offer and acceptance of employment, date of hire, date(s) of promotions(s), work history, technical skills, educational background, professional certifications and registrations, language capabilities, training records, as well as dates of resignation or termination, reason for resignation or termination, information relating to administering termination of employment (e.g. references).
- Employee equity plan information.
- Beneficiary and emergency contact information and waiver/consent forms for participation in company sponsored events and use of fitness facilities.

- Forms and information relating to the application for, or in respect of changes to, employee health and welfare benefits; including, short and long term disability, medical and dental care, etc., as well for processing requests for employment accommodations and leaves of absence.
- Height, weight, photographs, videos, and information regarding physical limitations and special needs.
- Records of work absences, vacation/paid time off entitlement and requests, salary history and expectations, performance appraisals, disciplinary actions, and performance/development plans (including monitoring compliance with and enforcing our policies).
- Where required by law or recommended by federal, state, or local government agency (e.g. health board or the Centers for Disease and Prevention), and where applicable, we may collect health and medical information regarding the employee, including but not limited to potential exposure to and exhibited symptoms of contagious disease.
- Where permitted by law and applicable we may collect the results of credit and criminal background checks, the results of drug and alcohol testing, screening, health certifications, vehicle registration and driving history.
- Information required for us to comply with laws, the requests and directions of law enforcement authorities or court orders (e.g., child support and debt payment information).
- Acknowledgements regarding our policies, including employee handbooks, ethics and/or conflicts of interest policies and computer and other corporate resource usage policies.
- Geolocation Information, information captured on security systems, key card entry systems, timekeeping entries, electronic delivery systems, and vehicle telematics and video telematics systems.
- Voicemails, e-mails, internet search and browsing histories, instant messaging, correspondence, documents, and other work product and communications created, stored or transmitted using our networks, applications, devices, computers or communications equipment.
- Information relating to any previous applications you may have made to Dealer Tire or any of its affiliated businesses and/or any previous employment history with such entities.

5. How We Use the Personal Information We Collect

Dealer Tire uses your Personal Information in order:

- To manage all aspects of an employee's employment relationship, including, but not limited to the establishment, maintenance, and termination of employment relationships. Examples of activities related to this include: determining eligibility for initial employment, including the verification of references and qualifications; pay and benefit administration; the issuance and management of equity options; corporate travel and other

reimbursable expenses; development and training; absence monitoring; project management; auditing, compliance, and risk management activities; conflict of interest reporting; employee communications; performance evaluation; disciplinary actions; internal investigation activities; career management, assessment of qualifications for a particular job or task; processing employee work-related claims (e.g., worker compensation, insurance claims); succession planning; relocation assistance; obtaining and maintaining insurance; the provision of employee related services; and other general operations, administrative, financial, and human resources related purposes.

- Assisting you with obtaining an immigration visa or work permit where required and updating I-9 documentation.
- For use in video conferencing.
- To allow you to operate a motor vehicle on behalf of us.
- Maintain directories of employees.
- For employee engagement programs, including surveys.
- Administer our occupational safety and health programs.
- To protect the safety and security of our workforce, guests, property, and assets (including controlling and facilitating access to and monitoring activity on and in our premises, while operating of our vehicles, and activity using our computers, devices, networks, communications and other assets and resources).
- To investigate and respond to claims against us.
- To maintain emergency contact and beneficiary details.
- To comply with applicable laws (e.g. health and safety, employment laws, office of foreign asset controls regulations, tax laws), including judicial or administrative orders regarding individual employees (e.g., garnishments, child support payments).
- Carry out any additional purposes that we advise you of (if applicable law requires your express consent for such additional use or disclosure we will obtain it from you).
- Carry out other purposes as part of our business activities when reasonably required by us.

6. Sharing Personal Information

Your personal information may be shared, including to our affiliates, subsidiaries, and other third parties, as follows:

- Where you request us or provide your consent to us.
- In order to carry out the uses of Personal Information described above (see, How We Use the Personal Information We Collect).

- When using or collaborating with third parties or our affiliated business entities in the operation of our business, including in connection with providing many of the benefits and services we offer our employees (e.g., Human Resources Information Systems, wellness program service providers, insurance providers). When we share Personal Information with third parties we require that they only use or disclose such Personal Information only as necessary to provide the requested services to us and in a manner consistent with the use and disclosure provisions of this Privacy Policy and applicable law.
- We may buy or sell businesses and other assets. In such transactions, employee information is generally one of the transferred business assets and we reserve the right to include your Personal Information as an asset in any such transfer. Also, in the event that we, or substantially all of our assets, are acquired, your Personal Information may be one of the transferred assets.
- Where required by law, by order or requirement of a court, administrative agency, or government tribunal, which includes in response to a lawful request by public authorities, including to meet national security or law enforcement requirements or in response to legal process.
- If we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property.
- As necessary to protect the rights, privacy, safety, or property of an identifiable person or group or to detect, prevent or otherwise address fraud, security or technical issues, or to protect against harm to the rights, property or safety of Dealer Tire, our users, applicants, candidates, employees, customers, contractors, the public, or as otherwise required by law.
- Where the Personal Information is public.
- To our legal and other professional advisers.

This Privacy Policy is intended to comply with Dealer Tire's obligations under California's Consumer Protection and Privacy Act, as amended ("CCPA") and similar state and federal laws applicable to the privacy of Personal Information collected hereunder. This Privacy Policy shall be interpreted in such a manner. Dealer Tire reserves the right to modify this Privacy Policy in its sole discretion. This Privacy Policy does not provide any rights to you other than those mandated upon us by applicable law(s).