

**AUTOZONE, INC. WORK-RELATED PRIVACY POLICY  
(STATE OF CALIFORNIA ONLY)**

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**Last Update: [09-03-2020]**

**1. PURPOSE AND INTENT**

AutoZone, Inc., and its operating groups, parent(s), subsidiaries and affiliates (collectively, “the Company”) are committed to protecting the privacy and security of the personal information of our job applicants, employees and their emergency contacts and beneficiaries, independent contractors, board of directors, and corporate officers who are residents of California (“Work-Related Individuals”). This privacy policy describes how we collect and use personal information about you during and after your working relationship with us. The Company is responsible for deciding how we collect and use personal information about you.

This Privacy Policy is intended to comply with the California Consumer Privacy Act (“CCPA”). This Privacy Policy also complies with the Web Content Accessibility Guidelines, version 2.1.} Work-Related Individuals with disabilities may access this Privacy Policy notice in an alternative format by contacting us at 1-800-288-6966 or by emailing: [customer.service@autozone.com](mailto:customer.service@autozone.com). This Privacy Policy does not form part of any contract of employment or other contract to provide services. We may update this policy at any time.

It is important that you understand this policy, together with any other privacy notices we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information. If you have any questions about this privacy policy or how we handle your personal information, please contact us at: (866) 246-5230.

## **2. DATA PROTECTION PRINCIPLES**

We will comply with applicable data privacy and protection law. This says that the personal information we hold about you must be: (i) used lawfully, fairly and in a transparent way; (ii) collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes; (iii) relevant to the purposes we have told you about and limited only to those purposes; (iv) accurate and kept up to date; (v) kept only as long as necessary for the purposes we have told you about; and (vi) kept securely.

## **3. WHAT PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE USE IT**

### **A. Job Applicants**

We collect the following categories of personal information for job applicants for the purposes described below:

- Name and contact information;
- Job preference and work availability;
- Social Security Number and/or other identification information;
- Education and qualifications;
- Employment history and experience;
- Military service;
- Reference and background check information, including relevant criminal history and credit history;
- Social media information;
- Pre-employment test results;
- Post-offer medical examination information and results, including drug test results;

- Voluntary self-disclosure information regarding minority, veteran, and disability status; and
- Information provided by you during the hiring process.

The Company collects this information to hire the best qualified applicants and to comply with applicable employment laws.

B. Employees, Emergency Contacts and Beneficiaries:

We collect the following categories of personal information for employees:

- New Hire Onboarding Information, such as name and contact information; job title, duties; Social Security Number, driver's license number, passport and other government identification numbers; date of birth; immigration and work authorization status, employee photo for identification badges and system profiles; emergency contact information; withholding tax information; voluntary self-disclosure information regarding minority, veteran, and disability status; and dependent and beneficiary information.
- Pay Information, such as pay rate, payroll deduction information, and banking information for direct deposit, and credit card information for expense reimbursement.
- Benefits Enrollment and Administration Information, such as benefit selection information; Social Security Numbers or other government identification numbers; date of birth; beneficiary information; leave of absence information; and other information necessary to administer benefits programs and process benefits claims.
- Performance Management Information, such as employment status (full-time or part-time, regular or temporary); work schedule; job assignments; hours worked; business travel information; expatriate and secondment assignments; accomplishments and awards; training and development information; performance evaluation information;

complaint resolution information; discipline and counselling information; and employment termination information.

- Equality and Diversity Information, such as minority, veteran, and disability status. The Company collects this information through voluntary self-disclosure and other means to implement the Company's diversity programs and to comply with applicable laws.
- Health and Safety Information, such as medical or health conditions, job restrictions, drug testing information, workplace accident and illness information, and health insurance information.
- Electronic Communications Information, such as email, computer, internet, telephone, and mobile device usage; IP address; log-in information; and location information.
- Legal and Contractual Information, such as information necessary to respond to law enforcement and governmental agency requests, comply with legal and contractual obligations, exercise legal and contractual rights; and initiate or respond to legal claims.

The Company collects this information to manage the employment relationship with our employees, protect the company's confidential information and equipment, comply with our legal and contractual requirements, and to establish, exercise and defend legal and contractual rights and claims.

#### C. Independent Contractors:

We collect the following categories of personal information for the purposes described below:

- Name and contact information;
- Payment information, including bank name, account number, and routing number;
- W-9 Information, including business name; Social Security number or Taxpayer Identification Number (TIN)

The Company collects this information to retain qualified independent contractors and to comply with applicable laws.

D. Board of Directors:

We collect the following categories of personal information for the purposes described below:

- Name and contact information;
- Business title;
- Social Security Number, driver's license number, and other government identification numbers;
- Date of birth;
- Citizenship information;
- Central Index Key (CIK) Number and/or CCC (CIK Confirmation Code) Number;
- Executive assistant's name and contact information;
- Spouse's name and contact information;
- Photo for identification badges and system profiles and publications;
- Banking information for expense reimbursement;
- Executive assistant's name and contact information;
- Voluntary self-disclosure information regarding gender, race, ethnicity, veteran, and disability status;
- Beneficiary information; and
- Food allergies (for catering)

The Company collects this information to retain qualified Board Directors and to comply with applicable laws.

E. Officers:

To the extent that our Corporate Officers are employees of the Company, we collect the personal information listed above for employees and use the information for the same purposes

#### **4. FAILURE TO PROVIDE PERSONAL INFORMATION**

If you fail to provide certain information when requested, we may not be able to address our employment or contract obligations (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

#### **5. CHANGE OF PURPOSE**

We will only use your personal information for the purposes we have disclosed in our notice(s). If we need to use your personal information for an unrelated purpose, we will notify you. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

#### **6. DATA SECURITY**

While no data security system can fully protect personal information from unauthorized data breaches, The Company has implemented reasonable safeguards and controls, consistent with its legal obligations under CA and other local, state and federal laws. The Company is committed to: (i) seeking to safeguard all personal information that you provide to us; (ii) seeking to ensure that it remains confidential and secure; and (iii) taking all reasonable steps to ensure that personal privacy is respected. All our data is stored in written or electronic form on our servers and computers and in various physical locations. We maintain physical, electronic and procedural safeguards to protect your personal information from misuse, unauthorized access or disclosure and loss or corruption by computer viruses and other sources of harm. We restrict access to personal information to those staff members, The Company and third parties who need to know that information for the purposes identified in our notice(s).

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

## **7. DATA RETENTION**

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymize your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

Once you are no longer an employee or contractor of The Company, we will retain and securely destroy your personal information in accordance with The Company's record retention policies.

## **8. CHANGES TO THIS PRIVACY POLICY**

As we strive to improve our practices, we may revise The Company's Privacy Policy from time to time. This Privacy Policy is not a contract and we reserve the right to change this policy at any time and to notify you of those changes by posting an updated version of this policy. It is your responsibility to check this policy from time to time for any changes.