### **AUTOZONE, INC'S APPLICANT AND WORK-RELATED PRIVACY POLICY**

Updated: \_04/01/2023\_\_

This Privacy Policy is also available in **Español**.

AutoZone values and respects the privacy of its current and former employees (collectively, "AutoZoners" or "you"), as well as applicants. This Applicant and Work-Related Privacy Policy (the "Privacy Policy") describes how AutoZone, Inc. and its U.S. operating subsidiaries (including, but not limited to, ALLDTATA LLC) and affiliates (collectively "AutoZone," "our," "us," "we," or "Company"), collect, use, share, and protect personal information related to job applicants, and current and former employees in an employment context. It also contains other important privacy disclosures, such as choices you can make with regard to your personal information, how we may update the Privacy Policy, and how you can contact us with questions about the Privacy Policy.

This Privacy Policy applies to the personal information we collect in association with your employment-related interactions with us, including, but not limited to:

- Use of our websites, including mobile websites, to apply for a job with AutoZone or to access applicant or employee resources
- Recruiting activities in our stores, distribution centers, Store Support Centers, or at our hiring events
- Use of our information technology resources, including but not limited to networks, devices, communications tools, and applications
- Phone and email communications
- Interactions with customers and other AutoZoners

It also applies to personal information that we receive from business partners and other third parties, such as recruiters, background check providers, customers, other AutoZoners, and references. You can find out more information about our collection of personal information below.

This Privacy Policy does not apply to our international subsidiaries and affiliates, such as ALLDATA Europe or ALLDATA Canada, AutoZone Mexico or AutoZone Brazil, among others. You can find the applicable description of privacy practices by clicking on the links available on the websites operated by these companies, or by looking in the settings menus of their mobile applications. Also, this Privacy Policy does not apply to third-party websites accessible through our websites, nor does it apply to the information we collect from individuals interacting with us in a consumer, rather than an employment, capacity.

# WHAT INFORMATION DO WE COLLECT?

The table below describes the categories of personal information we have collected over the last twelve (12) months regarding AutoZoners and job applicants, the sources we collect the information from, our purposes for collecting the information, and the types of recipients that may receive the information from us.

# **IDENTIFIERS**

What Information Does This Include?	Where Do We Collect It From?	Why Do We Collect and Disclose It?	Who Do We Disclose Your Information To?
Identification information that can be used to identify you (as well as your beneficiaries and dependents), such as name, address, telephone number, email address, driver's license number, license plate numbers for access to facilities, applicant and/or employee ID, date of birth, and Social Security number or similar identifiers	<ul> <li>Information you provide when you submit a resume, job application or interact with the chat function on our careers page</li> <li>Information you provide when, as an employee, you utilize our AutoZoners App</li> <li>Information from the computers, electronic devices you use to access our systems, applications and other technologies</li> <li>Companies that provide services on our behalf (e.g., sourcing, recruiting and onboarding providers, background check providers, payroll, benefits and other service providers)</li> <li>Payroll, benefits and other service providers that provide payments and services to you as an AutoZone employee</li> <li>Service providers who assist us in completing our business activities and objectives</li> <li>Various third parties, including, but not limited to, recruiters, references, social media platforms (e.g., LinkedIn, Indeed, Facebook), public records sources, current and former coworkers and supervisors</li> </ul>	<ul> <li>To identify you and maintain records related to your application for employment</li> <li>To recruit, manage and support our workforce</li> <li>To communicate with you</li> <li>To manage the employment relationship, including administering pay and benefits to you</li> <li>To support workforce analytics</li> <li>To comply with laws and regulations</li> <li>To monitor your use of companyowned technology in accordance with our policies and procedures</li> <li>Fraud prevention, security, safety and asset protection</li> </ul>	<ul> <li>Service providers that process information on our behalf (e.g., providers of human capital management services, workforce application providers, payroll and benefits providers, data storage providers, credit reporting agencies and background check providers)</li> <li>Customers, vendors and suppliers for communication purposes</li> <li>Advisors and consultants</li> <li>Law enforcement, government authorities and other entities if we deem such disclosure necessary to comply with the law, support investigations and to protect the safety, rights and property of you, us, and others, as well as our assets</li> <li>Our affiliates and subsidiaries, and any successor to all or part of our business</li> </ul>

# **INTERNET & NETWORKING ACTIVITY**

What Information Does This Include?	Where Do We Collect It From?	Why Do We Collect and Disclose It?	Who Do We Disclose Your Information To?
Internet or other similar network activity associated with use of our equipment, networks, or other resources, including but not limited to incoming and outgoing electronic communications, chat functions, browsing and search history, interactions with websites or applications, including through use of what is now commonly known as "sessions replay" technologies, which may include data relating to full Uniform Resource Locators (URLs), clickstreams, login credentials, electronic records and files, IP addresses and other information associated with network activities, and logs of application access and use; we, and our authorized service providers, may also use analytics tools to collect information about your keystroke activity and rhythms, mouse movements, scrolling, and clicks when you use our websites or mobile applications	<ul> <li>Directly from you or the devices or computers you use to access our systems, applications, and other technologies</li> <li>Security and fraud prevention services that help us confirm that requests and interactions are valid and otherwise help us protect our assets and you</li> <li>The signals or identifiers emitted by computers, mobile devices or other equipment used while performing work activities</li> </ul>	<ul> <li>To manage the employment relationship</li> <li>To assess our application process and improve applicant experience</li> <li>To monitor the use of companyowned technology in accordance with our policies and procedures</li> <li>To monitor employee productivity and improve workforce management</li> <li>Fraud prevention, security, safety, and asset protection</li> </ul>	<ul> <li>Service providers that process information on our behalf, such as suppliers, vendors, providers of digital analytics services, providers of workforce applications, data storage providers, and fraud prevention services</li> <li>Advisors and consultants</li> <li>Law enforcement, public and government authorities, and other entities as we deem reasonably necessary to comply with law, support investigations, and protect the safety, rights and property of you, us, and others</li> <li>Our affiliates and subsidiaries, and any successor to all or part of our business</li> </ul>

# **EDUCATION INFORMATION**

What Information Does This	Where Do We Collect It From?	Why Do We Collect and Disclose It?	Who Do We Disclose Your
Include?			Information To?

I Aur nuciness		Applicant and AutoZoner transcripts, certifications, skills and proficiencies, and trainings attended	•	Directly from you Companies that provide services on our behalf (e.g., education verification services) Educational institutions or professional organizations	•	To assess and analyze candidate and AutoZoner qualifications for hiring and promotions  To recruit, manage, and support our workforce  To conduct workforce analytics	•	Service providers that process information on our behalf, such as data storage and human capital management providers Advisors and consultants Law enforcement, public and government authorities, and other entities as we deem reasonably necessary to comply with law, support investigations, and protect the rights and property of you, us, and others Our affiliates and subsidiaries, and any successor to all or part of our business
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### **DEMOGRAPHIC INFORMATION**

What Information Does This	Where Do We Collect It From?	Why Do We Collect and Disclose It?	Who Do We Disclose Your
Include?			Information To?
Demographics as permitted by law, such as age, race, ethnicity, ethnic origin, color, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, reproductive health, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status	<ul> <li>Directly from you</li> <li>Companies that provide services on our behalf (e.g., background checks)</li> <li>Government entities</li> </ul>	<ul> <li>To support workforce analytics</li> <li>To provide you with benefits</li> <li>To provide accommodations and assess eligibility for certain benefits (e.g., tax benefits)</li> <li>To comply with laws and regulations</li> </ul>	<ul> <li>Service providers that process information on our behalf, such as data storage and human capital management providers</li> <li>Advisors, consultants and benefits providers</li> <li>Law enforcement, public and government authorities, and other entities as we deem reasonably necessary to comply with law, support investigations, and protect the rights and property of you, us, and others</li> <li>Our affiliates and subsidiaries, and any successor to all or part of our business</li> </ul>

### **LOCATION INFORMATION**

What Information Does This Include?  Location based on IP address or	<ul><li>Where Do We Collect It From?</li><li>Directly from you or the devices</li></ul>	<ul><li>Why Do We Collect and Disclose It?</li><li>To support workforce analytics</li></ul>	Who Do We Disclose Your Information To?  • Service providers that process
mobile device location information	or computers you use to access our systems, applications, and other technologies  • Security and fraud prevention services that monitor locations of devices  • The signals or identifiers emitted by computers, mobile devices or other equipment used while performing work activities	<ul> <li>To operate and improve our business</li> <li>To comply with laws and regulations</li> <li>To monitor use of technology in compliance with our policies and practices</li> <li>Fraud prevention, security, safety, and asset protection</li> </ul>	<ul> <li>information on our behalf, such as workforce analytics services</li> <li>Advisors and consultants</li> <li>Law enforcement, public and government authorities, and other entities as we deem reasonably necessary to comply with law, support investigations, and protect the safety, rights and property of you, us, and other</li> <li>Our affiliates and subsidiaries, and any successor to all or part of our business</li> </ul>

# **EMPLOYMENT INFORMATION**

What Information Does This Include?	Where Do We Collect It From?	Why Do We Collect and Disclose It?	Who Do We Disclose Your Information To?
Professional or employment-related information, such as employment history, performance evaluations, work schedule, salary and other compensation information, benefits and allowances, tenure, hours worked, terms of employment, records of any disciplinary proceedings or investigations, job responsibilities, background check information, drug testing results, work schedule, business and travel expenses, and any documentation relating to work eligibility	<ul> <li>Directly from you</li> <li>Through your work-related interactions with coworkers, supervisors, and other individuals in the workplace or while performing work-related activities</li> <li>Companies that provide services on our behalf (e.g., background check providers)</li> <li>Payroll, benefits, and other service providers that provide payments and services to you</li> </ul>	<ul> <li>To recruit, manage and support our workforce</li> <li>To manage the employment relationship, including determining and assessing pay and benefits to you</li> <li>To support workforce analytics</li> <li>To comply with laws and regulations</li> <li>Fraud prevention, security, safety and asset protection</li> </ul>	<ul> <li>Service providers that process information on our behalf, such as data storage providers, benefits, compensation, and background check providers</li> <li>Advisors and consultants</li> <li>Law enforcement, public and government authorities, and other entities as we deem reasonably necessary to comply with law, support investigations, and protect the rights and property of you, us, and other</li> </ul>

<ul> <li>Security and fraud prevention services that help us protect our</li> </ul>	<ul> <li>Our affiliates and subsidiaries, and any successor to all or part of</li> </ul>
assets and you	our business
Service providers who assist us in	
completing our business activities	
and objectives	
<ul> <li>Various third parties, including,</li> </ul>	
but not limited to, recruiters,	
references, social media	
platforms (e.g., LinkedIn, Indeed,	
Facebook), public records	
sources, current and former co-	
workers and supervisors	

# **VIDEO RECORDINGS & AUDIO RECORDINGS**

What Information Does This Include?	Where Do We Collect It From?	Why Do We Collect and Disclose It?	Who Do We Disclose Your Information To?
Video recordings of your access to and activities in our facilities or vehicles; Audio recordings of calls made or received using our communications equipment; recordings of chat functions, browsing and search history, interactions with websites or applications, browsing and search history, interactions with websites or applications, including through use of what is now commonly known as "sessions replay" technologies	<ul> <li>Via cameras deployed in our stores, in parking lots, the Store Support Center, and at our distribution centers and other facilities</li> <li>Via call recordings</li> <li>Via digital meetings platforms</li> <li>Directly from you or the devices or computers you use to access our systems, applications, and other technologies</li> <li>The signals or identifiers emitted by computers, mobile devices or other equipment used while performing work activities</li> </ul>	<ul> <li>Fraud prevention, security, safety, and asset protection</li> <li>To monitor use of technology in compliance with our policies and practices</li> <li>To operate and improve our business</li> <li>Training and process improvement</li> </ul>	<ul> <li>Service providers that process information on our behalf, such as data storage providers, communications providers, and security and fraud prevention providers</li> <li>Advisors and consultants</li> <li>Law enforcement, public and government authorities, and other entities as we deem reasonably necessary to comply with law, support investigations, and protect the safety, rights and property of you, us, and other</li> <li>Our affiliates and subsidiaries, and any successor to all or part of our business</li> </ul>

### **BIOMETRIC INFORMATION**

What Information Does This	Where Do We Collect It From?	Why Do We Collect and Disclose It?	Who Do We Disclose Your
Include?			Information To?
We do not collect biometric	n/a	n/a	n/a
information from our applicants or			
AutoZoners			

### INFORMATION THAT MAY BE CONSIDERED SENSITIVE UNDER SOME LAWS

What Information Does This	Where Do We Collect It From?	Why Do We Collect and Disclose It?	Who Do We Disclose Your
Include?			Information To?
Certain identifiers (i.e., government identification numbers), login credentials used to access accounts, precise geolocation, certain demographics (i.e., race, ethnicity, or ethnic origin), contents of communications you send or receive using AutoZone resources where we are not a recipient and health-related information	<ul> <li>Directly from you</li> <li>The signals or identifiers emitted by computers, mobile devices or other equipment used while performing work activities</li> <li>Telematic devices located in our company fleet vehicles</li> </ul>	<ul> <li>To monitor use of vehicles in compliance with our policies and practices</li> <li>We process such information only for those reasonably expected purposes expressly permitted under the California Consumer Privacy Rights Act and other applicable privacy laws</li> </ul>	<ul> <li>Service providers that process information on our behalf, such as data storage providers, human capital management providers and security and fraud prevention providers</li> <li>Advisors and consultants</li> <li>Law enforcement, public and government authorities, and other entities as we deem reasonably necessary to comply with law, support investigations, and protect the safety, rights and property of you, us, and other</li> <li>Our affiliates and subsidiaries, and any successor to all or part of our business</li> </ul>

We do not knowingly collect personal information from children under the age of 16 without parental or guardian consent. If a child under the age of 16 has provided us with personally identifiable information, we ask that a parent or guardian contact us so that the information can be deleted.

#### DATA RETENTION

We retain the categories of personal information we collect regarding applicants and AutoZoners for as long as reasonably necessary to assess employability, manage ongoing employment relationships, and achieve the purposes disclosed above, unless a shorter retention period is required by law. We may retain personal information after employment relationships end or after employment decisions are made. The length of retention may vary depending upon factors such as:

- The existence of an ongoing relationship between you or your dependents and us
- Recordkeeping or legal compliance requirements
- Pending or anticipated litigation
- The need to resolve inquiries or complaints
- Identifying other employment opportunities for you
- Protecting the rights or safety of you, us, or others

Below are *examples* of retention periods for documents and records that contain categories of personal information:

Record/Document	Retention Period
Security camera footage (at our Stores, Distribution Centers, Store Support Center)	30-45 days
AutoZoner emails	2 years
Application / resume	7 years after termination
Background check consent	7 years after termination
Offer letter/worksheet/critical hire form	7 years after termination
Disciplinary actions	7 years after termination
Performance appraisals	7 years after termination
Employee handbook acknowledgement	15 years
401(k) and pension plan documents (SPDs, SSMs), participant notices, account records, distribution forms, QDROs, appeal records and amendments	Permanent
Life and AD&D beneficiary designation or change form	Permanent
Confidentiality agreements (with intellectual property provisions)	Permanent

#### **HOW WE COLLECT INFORMATION?**

- **Directly From You** for example, when you complete an application, submit to a drug or alcohol screen, consent to a background check, complete an engagement survey, participate in training and development activities, perform other work-related activities that require submission of your personal information to complete, fulfill, or otherwise perform our business objective(s)
- Passively for example, we use cameras and other technologies in our stores, in parking lots and at other facilities for fraud prevention, security, and asset protection. We monitor use of technology to detect and measure security and fraud threats, as well as to monitor compliance with company policies. We also may conduct workforce related analytics that include your personal information, such as collecting information regarding how AutoZoners use information resources
- From Third Parties for example, from recruiters, consultants, advisors, references, social media public records sources, service providers who assist us in completing our business activities and objectives

#### **HOW DO WE USE INFORMATION?**

• Workforce Management Activities – for example, managing work activities and personnel, recruitment, appraisals, performance management, promotions and succession planning, transfers, rehiring, administering salary, compensation administration and reviews, wages, bonuses, and other awards, processing healthcare benefits, retirement savings plans, training, leave, managing disability and sickness leave and accommodations

- Workforce Analytics for example, analytics used to support workforce management activities referenced above, data security, and other operational activities, and measuring performance
- Communications Activities for example, facilitating communication with AutoZoners, ensuring business continuity, property management (e.g., laptops and mobile phones), providing employment confirmations, protecting the health and safety of associates and others, identifying and providing reasonable accommodations, safeguarding IT infrastructure, office equipment and other property, and communicating with your nominated contacts in an emergency
- Workforce Administration for example, AutoZoner evaluation processes, financial reward incentives, AutoZoner Assistance Fund requests, AutoZoner and family-related health care, retirement / benefit plans and programs

#### **HOW DO WE DISCLOSE INFORMATION?**

We may disclose your information for our business purposes and as legally required or permitted by law.

- With Third Parties for example, companies providing products, services, and other benefits to AutoZoners, service providers such as our vendors and customers who need to contact you in the course and scope of your employment, data storage providers, payroll and benefits providers, other services providers as we deem necessary to conduct our business
- With Our Subsidiaries And Affiliates for example, joint projects with one of our international subsidiaries
- With Any Successor To All Or Part Of Our Business for example, if all or part of our business is sold or otherwise acquired, we may sell or disclose our associate lists and other personal information we collect in preparation for or as part of that transaction
- In Order To Comply With The Law / Cooperate With Law Enforcement for example, complying with a search warrant or subpoena, federal and state agency requests, reporting requirements regarding finances and taxes
- **For Security, Safety, And Fraud Prevention** for example, to detect, prevent and investigate potentially fraudulent or unlawful activities, to collect unpaid debts, cooperation with civil or criminal investigations into alleged AutoZoner or Company misdeeds
- At Your Direction for example, if you ask us to provide your information to a third-party to participate in a benefit, perk, or other activity offered by AutoZone

# Your California Privacy Rights

Job applicants and AutoZoners who are California residents are afforded certain rights related to their information under state law. AutoZone informs you that, where applicable under relevant law, individuals may be entitled to the following:

- Right to Know (Access / Disclosure): to have access to your Personal Information upon simple request that is, you may receive a copy of such data upon receipt of a verifiable request, along with other information related to the collection or processing.
- <u>Right to Disclosure of Direct Marketers</u>: to have knowledge of and access to, upon simple request, and free of charge, the categories and names of addresses of third parties that have received personal information for direct marketing purposes. Please see the "Direct Marketers Disclosure" section below for more information. <u>Note</u>: AutoZone does not disclose your information to third parties for the purpose of direct marketing of our products.

- Collecting, Selling, Sharing, or Disclosing Personal Information: upon receipt of a verifiable request, to obtain a list of:
  - o The specific pieces of your personal information AutoZone holds;
  - o The categories of personal information collected about you, sold to third parties, or disclosed to third parties for business purposes;
  - o The categories of personal information shared or sold within the last 12 months;
  - o The categories of sources from which personal information is collected;
  - o The business or commercial purpose for collecting or selling personal information; and
  - o The categories of third parties with whom personal information is shared, sold, or disclosed for a business purpose.
- Right to Opt-Out of the Sale and Sharing of Personal Information: You may have the right to opt-out of the sale or sharing of personal information under
  certain circumstances. Other than through the use of cookies and tracking technologies on our website, AutoZone does not sell applicants' or
  employees' personal information
- To opt-out of the sharing of personal information through cookies and tracking technologies, click here
- Right to Request Deletion: to obtain the deletion of your personal information in the situations set forth by applicable data protection law and upon receipt of a verifiable request. In complying with your request to delete AutoZone will notify third parties who may have received your personal information subject to certain legal exceptions
- Right to Correct Inaccurate Information: to request correction of inaccurate personal information, taking into account the nature of the personal information and the purposes for which the personal information is processed. We will use commercially reasonable efforts to correct your information. In addition, current AutoZoners can exercise a self-service option to correct certain personal information in our AZ People system (e.g., name, personal contact information, demographic information, biographical information, emergency contact information)
- Right to Data Portability: to have your personal information directly transferred by us to a third-party processor of your choice (where technically feasible; may be limited to situations when processing is based on your consent)
- Right to Limit Use of Sensitive Personal Information: you have the right to request that AutoZone limit the use of your sensitive information to fulfill a specified purpose. Note: We process such information only for those reasonably expected purposes expressly permitted under the California Consumer Privacy Rights Act and other applicable privacy laws
- Right to Non-Retaliation. As defined under relevant law, you have a right to non-retaliation for exercising your rights

# **Exercising Your California Privacy Rights**

If you have questions about this Privacy Policy, the practices of this site or your dealings with this site, or if you are an applicant or a current or former AutoZoner, and a California resident and would like to exercise your privacy rights, please contact AutoZone:

By Website: <a href="http://dsar.autozone.com">http://dsar.autozone.com</a>

• By telephone: (866) 246-5230

We ask that you provide the following information to submit a request:

- State of residence
- First and last name

- Email address
- Phone number
- Postal address
- Employee ID (former and current AutoZoners)

The information that you provide will be analyzed to determine whether we can reasonably verify your identity. We may need to obtain additional information from you to process your request.

There may be circumstances where we may not completely fulfill your request, as permitted under the CCPA. For example, if you submit a request to delete your personal information, we may need to retain certain personal information to complete a transaction, manage our employment relationship with you, detect fraud, or comply with our legal obligations.

If you are an authorized agent acting on behalf of a California resident, please send your request to <a href="mailto:privacy@autozone.com">privacy@autozone.com</a> and include the following information about you and the person on whose behalf you are submitting the request: full name, mailing address, email address, and phone number. You should also provide proof of your authorization to act on the other person's behalf. We will contact you for additional information once your request has been received.

# Difficulty Accessing Our Privacy Policy?

Individuals with disabilities who are unable to usefully access our Privacy Policy online may contact us at the above-listed contact information to inquire how they can obtain a copy of our Privacy Policy in another, more easily readable format.