

California Applicant & Employee Privacy Notice

What is the purpose of this document?

This California Applicant & Employee Privacy Notice (the “Notice”) for Jaguar Land Rover North America, LLC (“Company” or “JLRNA”), describes the Company’s collection of Personal Information from job applicants, employees, and contractors who are California residents, and the business purposes for which this data will be used. This Notice supplements any other privacy notices and is not intended to override them. For the purposes of this Notice, “Personal Information” means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to any individual or a household.

Overview

- **What personal information do we collect?** We collect the following categories of Personal Information: identifiers; employee/applicant records; geolocation data; protected characteristics; internet or other electronic network activity information; professional or employment-related information; audio, electronic, visual, thermal, olfactory, or similar information; and sensitive Personal Information (such as location information, government IDs, bank account information, and racial origin). You can find more details on those categories in the section below.
- **How do you use my information?** We collect and use your information to manage our workforce (including making hiring decisions), conduct our business, and comply with legal/compliance obligations.
- **Do you sell or share my information?** We do not sell your information, and we do not share it with third parties so they can provide you advertisements based on your activity across different websites (a practice commonly known as “targeted advertising”).
- **How long do you keep my information?** We retain your information for the period specified in our retention policy, unless legally required to keep it longer.

Categories of Personal Information Collected

JLRNA collects Personal Information about you during the application process and throughout the scope of your employment with the Company. In the last 12 months, we collected the following categories of Personal Information:

- **Identifiers.** This includes information such as your name, contact information, and government ID.
- **Employee/Applicant Records.** This includes information such as your name, contact information, government ID, and certain medical information.
- **Protected Characteristics.** This includes information you may voluntarily provide concerning details such as your race, gender, ethnicity, disability, age, religious belief, sexual orientation and military/veteran status.
- **Internet or Other Electronic Network Activity Information.** This information such as IT systems usage information related to your use of the Company’s equipment, systems, and other resources.

- **Geolocation Data.** We collect general location data.
- **Professional or Employment-Related Information.** This includes information such as your education, training, and certifications; prior work experience; credit, criminal history (only after a conditional job offer has been made), driving history and other background check information; and any other information that may be included in your resume or job application.
- **Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information.** This includes CCTV footage we capture and photos we take during company events.
- **Sensitive Personal Information.** This includes information such as precise location data, Social Security number, driver's license number, login credentials for Company websites or tools, bank account information, racial/ethnic origin, disability, citizenship, and immigration status.

For more details, please see the below list:

- **Identification data,** such as your name, Corporate Directory System Identification (CDSID), date of birth, nationality, citizenship, Social Security number or equivalent national identification number.
- **Contact details,** such as your work and home addresses, telephone numbers, email addresses, and emergency contact/next of kin details.
- **Family Information,** such as the name, relationship, date of birth, contact details, and social security numbers of your family members, and any other information that may be needed for the administration of benefits.
- **Information about your job,** such as job title, category and status, work location, department, employment terms, assigned tasks and projects, weekly hours, line manager's name, start and end date, and reason for leaving.
- **Job qualifications,** such as your education, training, and certifications; prior work experience; credit, criminal history (only after a conditional job offer has been made), driving history and other background check information; and any other information that may be included in your resume or job application.
- **Monitoring information,** such as IT systems usage information related to your use of the Company's equipment, systems, and other resources; badge swipes and other building security and access data; and CCTV images and/or recordings for security purposes.
- **Images/Photos,** such as photographs taken of you for business purposes or during Company-sponsored events.
- **Communication details,** such as email content, business letter content, business documents, and chat content.
- **Performance and disciplinary information,** such as performance objectives; performance reviews, evaluations and ratings; information about disciplinary allegations, the disciplinary process and any disciplinary warnings, details of complaints, and any outcome.

- **Information about your compensation and benefits**, such as your compensation (including but not limited to salary and bonus entitlements), participation in Company-sponsored vehicle programs, tuition assistance programs, and other fringe benefits; insurance benefits (including information about you and your dependents that we provide to the insurer); hours worked; overtime (if non-exempt); tax code; taxes withheld; holiday entitlement; sick and personal time; accrued salary information; and information relating to your retirement accounts.
- **Employment related documents and agreements**, such as employment agreements, confidentiality agreements, and proprietary rights agreements.
- **Payment information**, such as your bank details (for payroll and travel reimbursement purposes only) and business travel and entertainment data.
- **Health information**, as required by law or as necessary to manage the employment relationship, including COVID-19 health screenings, temperature checks, test results and proof of vaccination; drug screen results; benefits administration; occupational health; disability accommodation; workers' compensation; and medical leave.
- **Equal opportunity monitoring data**, to the extent voluntarily provided, such as race, gender, ethnicity, disability, age, religious belief, sexual orientation and military/veteran status.
- **Termination and post-employment information**, such as separation agreements, benefits notices, and unemployment compensations forms.

Sources of Personal Information

We collect your information from you, other Company employees, or third parties (such as your former employers). Sometimes we may contract with service providers, which are companies who perform certain tasks for us, to collect your information.

Business Purpose

The Company uses Personal Information for all purposes related to your application for employment as well as the creation, administration, and termination of your employment relationship with JLRNA. These purposes include, but are not limited to, the following:

- Making a decision about your recruitment or appointment.
- To assess your skills, qualifications, and suitability for the work or role for which you are applying.
- To carry out background and reference checks, where applicable.
- To communicate with you about the recruitment process.
- Determining the terms on which you work for us.
- Confirming you are legally entitled to work in the United States.

- To administer compensation, including, but not limited to, payment of wages and bonuses and income tax withholding and reimbursement of business expenses.
- Providing employment benefits to you if applicable, for example, medical insurance, life insurance, and retirement savings plans.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering evidence for workplace investigations or to address complaints or disciplinary actions.
- Making decisions about your continued employment or engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness to work.
- To administer leaves of absence as required by law or Company policy.
- Complying with legal obligations, including health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution, as well as to ensure the security of the Company's work sites, business operations and property.
- To conduct data analytics studies to review and better understand employee retention and attrition rates.
- Equal opportunities monitoring.

- To exercise the Company’s rights under applicable law and to support any claim, defense, or declaration in a case or before a jurisdictional and/or administrative authority, arbitration, or mediation panel.
- To meet legal and regulatory requirements including civil discovery in litigation involving JLRNA or its corporate parents or other affiliated companies.
- To facilitate administrative functions, including, but not limited to, the management and operation of information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, strategic planning, and the maintenance of licenses, permits and authorizations applicable to the Company’s business operations.
- We do not use your sensitive Personal Information for any reason other than those permitted by the California Consumer Privacy Act Regulation 7027(m). With your consent, or when allowed by law, we may also use your information for other purposes.

Disclosures of Personal Information

One of the ways we safeguard your information is by limiting our disclosure of it. We do not sell your Personal Information or use it for cross-context behavioral advertising (a practice commonly known as “targeted advertising”).

In the last 12 months, we have not provided your information to third parties, as the California Consumer Privacy Act defines that term. But we may provide your information to others in limited situations and for specific purposes. As an initial matter, we may provide your information to our legal and human resources teams. When we share your information outside of the Company, the disclosure generally falls into one of three categories. First, we may disclose your information to our affiliates or subsidiaries. These disclosures are for either our internal business purposes as well the internal business purposes of our affiliates and subsidiaries.

Second, we may provide your information to others who help us carry out tasks related to the purposes described above. These companies are generally our vendors, and they may assist with tasks such as providing IT services and processing data for our human resources operations. Before we disclose your Personal Information to our vendors, we require that they agree to only use the information consistent with our instructions and take specific measures to protect your information.

Third, we may share information with others who are not our vendors, affiliates, or subsidiaries when we believe doing so is appropriate to: (i) comply with law enforcement or national security requests and legal process, such as a court order or subpoena; (ii) protect your, our, or others’ rights, property, or safety; (iii) enforce the Company’s policies and contracts; (iv) collect amounts owed to us; and (v) prevent financial loss or in connection with an investigation or prosecution of suspected or actual illegal activity; assist with a corporate reorganization, such as a merger,

sale, or other asset transfer. Furthermore, sometimes we may need to disclose your information if we, in good faith, believe that disclosure is otherwise necessary or advisable.

Retention Period

The Company will retain your information consistent with our record retention policy, unless we are legally required to keep it longer. As a general matter, we keep your information for at least seven years after the termination of your employment.

Rights

As a California resident, you have the following rights concerning your Personal Information:

- **Right to Know.** You can ask us to give you information about our collection and use of your Personal Information. Specifically, you can request that we provide you one or more of the following: the categories of Personal Information we collected about you; the categories of sources from which we collected your Personal Information; our purposes for collecting your Personal Information; the categories of third parties to whom we disclose your Personal Information; and the specific pieces of Personal Information we collected about you.
- **Right to Delete.** You can ask us to delete your Personal Information that we collected from you. Please be aware, however, that our ability to delete information about employees is limited as we generally need to retain that information to fulfill our legal obligations—such as paying you.
- **Right to Correct.** You can ask us to correct any inaccurate or incomplete Personal Information that we have about you.

We will not discriminate against you for exercising the above rights. If you want to exercise any of these rights, please email sludwig4@jaguarlandrover.com and provide your name, state of residence, date of birth and email address. You may also have your authorized agent make a request on your behalf. If you have an agent making a request, we require signed permission from you.

We can only honor verified requests. Once we receive your request, we will verify your identity by comparing the information you provided us with our records, and will provide a response to your request.

Questions

If you have any questions or concerns about this Notice, please contact Susan Ludwig, JLRNA Human Resources Manager, at sludwig4@jaguarlandrover.com