

# FCA US LLC (“we,” “our” or “us”) Applicant Privacy Notice

Effective Date: January 1, 2023

**PURPOSE OF THIS NOTICE:** This FCA Applicant Privacy Notice (the “Applicant Notice” or “Notice”) describes FCA’s collection and use of certain personal information relating to California residents who are external job applicants and potential candidates for positions with FCA (“Applicants”), and is intended to satisfy our applicable notice requirements under the California Consumer Privacy Act and the regulations issued thereto, each as amended (collectively, the “CCPA”). We may provide additional notices to Applicants about our data collection practices (e.g., if we extend an employment offer).

**SCOPE OF THIS NOTICE:** This Applicant Notice applies to the personal information that we collect from and about Applicants, in the context of reviewing, assessing, considering, managing, storing or processing their applications or otherwise considering them for a position with us. Your use of our website or submission of an application or other information through this website is subject to our [Terms of Use](#), which include terms governing limitations on liability and the resolution of disputes; our [Terms of Use](#) are incorporated by reference into this Applicant Notice.

**What isn’t covered by this notice.** This Applicant Notice does not address or apply to our collection of personal information that is not subject to the CCPA, such as consumer credit reports and background checks, publicly available data lawfully made available from state or federal government records, or other information that is exempt under the CCPA. This Applicant Notice also does not apply to the personal information we collect from employees (which is subject to a separate privacy notice), or the personal information that we collect from customers or end users of FCA’s products and services, including Applicants, in the context of their personal use of FCA products and services, which is subject to the [FCA US Privacy Policy](#).

**Are our practices the same for all Applicants?** The categories of personal information we collect and our use of personal information may vary depending upon the position(s) or location, as well as the associated qualifications and responsibilities. In addition, if you visit one of our offices or locations, we may collect information as part of our onsite security. The information in this Applicant Notice is intended to provide an overall description of our collection and use of Applicant personal information.

**CATEGORIES OF PERSONAL INFORMATION COLLECTED:** Generally, we may collect (and have in the prior 12 months collected) the following categories of personal information about Applicants and disclose it to certain categories of third parties as for a business or commercial purpose as described below, to the extent permitted under applicable law. In some cases (such as where required by law), we may ask for consent or give you certain choices prior to collecting or using certain personal information.

Category	Third Parties Disclosures for Business or Commercial Purposes
<b>Name, contact information and other identifiers:</b> such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security Number, driver’s license number, passport number, or other similar identifiers.	<ul style="list-style-type: none"><li>• service providers</li><li>• advisors and agents</li><li>• affiliates and subsidiaries</li><li>• regulators, government entities and law enforcement</li><li>• internet service providers, operating systems, and platforms</li><li>• others as required by law</li></ul>

<p><b>Characteristics of protected classifications:</b> such as race/ethnicity, gender, sex, veteran status, disability, and other characteristics of protected classifications under California or federal law. (Note: generally, this information is collected on a voluntary basis, after an offer of employment has been extended, and is used in support of our equal opportunity and diversity and inclusion efforts or where otherwise required by law.)</p>	<ul style="list-style-type: none"> <li>• service providers</li> <li>• advisors and agents</li> <li>• affiliates and subsidiaries</li> <li>• regulators, government entities and law enforcement</li> <li>• others as required by law</li> </ul>
<p><b>Internet or other electronic network activity information:</b> including browsing history, search history, and information regarding a resident’s interaction with an internet website, application, or advertisement, as well as physical and network access logs and other network activity information related to your use of any FCA device, network or other information resource, if applicable.</p>	<ul style="list-style-type: none"> <li>• service providers</li> <li>• advisors and agents</li> <li>• affiliates and subsidiaries</li> <li>• regulators, government entities and law enforcement</li> <li>• internet service providers, operating systems, and platforms</li> <li>• others as required by law</li> </ul>
<p><b>Geolocation Data:</b> location information about a particular individual or device.</p>	<ul style="list-style-type: none"> <li>• service providers</li> <li>• advisors and agents</li> <li>• affiliates and subsidiaries</li> <li>• internet service providers, operating systems, and platforms</li> <li>• others as required by law</li> </ul>
<p><b>Audio, video and other electronic data:</b> audio (e.g., call recordings), electronic (e.g., CCTV footage), visual (e.g., photographs), thermal, olfactory, or similar information, if applicable.</p>	<ul style="list-style-type: none"> <li>• service providers</li> <li>• advisors and agents</li> <li>• affiliates and subsidiaries</li> <li>• regulators, government entities and law enforcement</li> <li>• others as required by law</li> </ul>
<p><b>Employment history:</b> professional or employment-related information.</p>	<ul style="list-style-type: none"> <li>• service providers</li> <li>• advisors and agents</li> <li>• affiliates and subsidiaries</li> <li>• others as required by law</li> </ul>
<p><b>Education information:</b> information about education history or background that is not publicly available personally identifiable information as defined in the federal Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).</p>	<ul style="list-style-type: none"> <li>• service providers</li> <li>• advisors and agents</li> <li>• affiliates and subsidiaries</li> <li>• others as required by law</li> </ul>
<p><b>Inferences drawn from personal information collected:</b> inferences used to create a profile about an individual reflecting her or his preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<ul style="list-style-type: none"> <li>• service providers</li> <li>• advisors and agents</li> <li>• affiliates and subsidiaries</li> <li>• others as required by law</li> </ul>
<p><b>Sensitive personal information:</b> such as Social Security number, driver’s license number, passport number, race, and national origin.</p>	<ul style="list-style-type: none"> <li>• service providers</li> <li>• advisors and agents</li> <li>• affiliates and subsidiaries</li> <li>• others as required by law</li> </ul>

We do not sell or share (as defined by the CCPA) Applicant’s personal information, including sensitive personal information, with third parties, including those we know who are under the age of 16.

## SOURCES OF PERSONAL INFORMATION

In general, we may collect Applicant personal information identified in the table above from the following categories of sources:

- Directly from you
- Recruiters and recruiting platforms
- Referrals and references
- Publicly available information and data brokers
- Service providers, representatives and agents
- Affiliates and subsidiaries

**PURPOSES FOR COLLECTING AND USING PERSONAL INFORMATION:** Generally, we may use the above categories of personal information for the following business or commercial purposes:

**Recruiting, hiring and managing, and evaluating Applicants:** to review, assess, recruit, consider or otherwise manage Applicants, candidates and job applications, including:

- scheduling and conducting interviews
- identifying candidates, including by working with external recruiters
- reviewing, assessing and verifying information provided, and otherwise screening or evaluating Applicants' qualifications, suitability and relevant characteristics
- extending offers, negotiating the terms of offers, and assessing salary and compensation matters
- satisfying legal and regulatory obligations
- communicating with Applicants regarding their applications and about other similar position(s) for which they may be interested
- maintaining Applicant personal information for future consideration
- in support of our diversity and inclusion and equal opportunity employment policy and practices

**Business operations and client services:** relating to the organization and operation of our business and our performance of services to clients, including related to:

- auditing and assessing performance and business operations, including client services and associated activities
- training and quality control
- client development and providing after-sales services to clients
- satisfying client reporting and auditing obligations
- facilitating business development opportunities, as relevant
- facilitating communications in furtherance of the foregoing

**Security and monitoring:** to monitor and secure our resources, network, premises and assets, including:

- monitoring for, preventing investigating, and responding to security and privacy incidents
- providing and managing access to physical and technical access controls
- monitoring activities, access and use in order to ensure the security and functioning of our systems and assets
- securing our offices, premises and physical assets, including through the use of electronic access systems and video monitoring

**Health and safety:** for health and safety purposes, such as contact tracing or including conducting appropriate screenings of Applicants prior to entering or accessing certain locations or premises.

**Auditing, accounting and corporate governance:** relating to financial, tax and accounting audits, and audits and assessments of our business operations, security controls, financial controls, or compliance with legal obligations, and for other internal business purposes such as administration of our records retention program.

**Business transactions:** relating to planning, due diligence and implementation of commercial transactions, for example mergers, acquisitions, asset sales or transfers, bankruptcy or reorganization or other similar business transactions.

**Defending and protecting rights:** to protect and defend our rights and interests and those of third parties, including to manage and respond to Applicant and other legal disputes, to respond to legal claims or disputes, and to otherwise establish, defend or protect our rights or interests, or the rights, interests, health or safety of others, including in the context of anticipated or actual litigation with third parties.

**Compliance with applicable legal obligations:** relating to compliance with applicable legal obligations (such as hiring eligibility, responding to subpoenas and court orders) as well as assessments, reviews and reporting relating to such legal obligations, including under employment and labor laws and regulations, Social Security and tax laws, environmental regulations, workplace safety laws and regulations, and other applicable laws, regulations, opinions and guidance.

**Contacting you about potential positions:** to identify other positions for which an Applicant may be suited or interested, and to contact Applicants about such positions. (If you do not wish to be contacted about potential positions, please let us know using the contact information below.)

## RETENTION OF PERSONAL INFORMATION

We will retain your personal information, including sensitive personal information, as long as necessary for purposes for which the personal information was collected and is used by us, as stated in this Notice. To the extent permitted by applicable law, we will retain and use your personal information as necessary to comply with our legal obligations, resolve disputes, maintain appropriate business records, and enforce our agreements.

## SENSITIVE PERSONAL INFORMATION

Notwithstanding the "Purposes for Collecting and Using Personal Information" section above, we only use and disclose sensitive personal information as reasonably necessary (i) to perform our services requested by you, (ii) to help ensure security and integrity, including to prevent, detect, and investigate security incidents, (iii) to detect, prevent and respond to malicious, fraudulent, deceptive, or illegal conduct, (iv) to verify or maintain the quality and safety of our services, (v) for compliance with our legal obligations, (vi) to our service providers who perform services on our behalf, and (vii) for purposes other than inferring characteristics about you. We do not use or disclose your sensitive personal information other than as authorized pursuant to section 7027 of the CCPA regulations (Cal. Code. Regs., tit. 11, § 7027 (2022)).

## CALIFORNIA RESIDENTS' RIGHTS

**Applicant Rights.** In general, California residents have the following rights with respect to their personal information:

- **Do not sell or share (opt-out):** to opt-out of our sale or sharing of their personal information. We do not sell or share personal information of Applicants, including about California consumers who we know are younger than 16 years old.
- **Right of deletion:** to request deletion of their personal information that we have collected about them and to have such personal information deleted (without charge), subject to certain exceptions.
- **Right to know:** the right to know what personal information we have collected about them, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about them.

- Right to correct inaccurate information: to request correction of their personal information that we have collected about them and to have such personal information corrected.
- Right to limit the use or disclosure of sensitive personal information: the right to limit the use or disclosure of sensitive personal information to those uses authorized by CCPA. However, we do not use or disclose sensitive personal information except for the purposes described above under “Sensitive Personal Information”, as authorized by CCPA.
- Right to non-discrimination: the right not to be subject to discriminatory treatment for exercising their rights under CCPA.
- Financial incentives: California residents have the right to be notified of any financial incentives offers and their material terms, the right to opt-out of such incentives at any time and may not be included in such incentives without their prior informed opt-in consent. Where we offer any financial incentives under the CCPA, we will notify you in advance of the material terms of such incentives and your related rights, before we obtain your consent to such incentives.

**Submitting Requests.** You may submit requests to us [here](#). In addition, you may make certain requests to us by contacting us at 1-800-332-9978 (toll free).

Please note that we may require additional information from you in order to verify your request.

Authorized agents may submit requests to us [here](#). If you are submitting a request through an authorized agent, the authorized agent must confirm their relationship with you. We may also request that any authorized agents verify their identity, including by providing information about themselves, such as their name, email, phone number, and address. We may reach out to you directly to confirm that you have provided the agent with your permission to submit the request on your behalf.

There may be circumstances where we will not be able to honor your request. For example, if you request deletion, we may need to retain certain personal information to comply with our legal obligations or other permitted purposes. However, we will only use personal information provided in a verifiable consumer request to verify your identity or authority to make the request.

**CONTACTING US ABOUT THIS NOTICE:** If you have any questions or concerns regarding our use of personal information as described in this Applicant Notice, please contact the FCA U.S. Privacy Office at [dprivacy@stellantis.com](mailto:dprivacy@stellantis.com).