



CCPA Candidate Privacy Notice

Carvana, LLC and its affiliates and subsidiaries (collectively “Carvana,” “our,” or “we”) are committed to protecting the privacy of personal information. This notice informs you of Carvana’s practices concerning the collection, use, and disclosure of personal information collected from you in connection with your job inquiry and/or application with Carvana.

DEFINITIONS

- **Personal Information** means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household.
- **Candidate** means a natural person acting as a past, current, or prospective job applicant to or contractor seeking to do business with Carvana.

CATEGORIES OF PERSONAL INFORMATION AND PURPOSES OF USE

We may process the following categories of your Personal Information:

- **Identifiers**, such as real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number/social insurance number, driver’s license number, passport number, or other similar identifiers.
- **Personal information subject to the California Customer Records Act**, such as real name, signatures, social security number, address, telephone number, or other similar identifiers.
- **Characteristics of protected classes under California or US Federal law (as applicable)**, such as physical characteristics or description, age, race, disability, and national origin.
- **Financial Information**. Such as credit history check, household income data, salary, and loans.
- **Internet activity**. Electronic network activity information respecting the use of Carvana-provided networks, systems, platforms and devices; including, but not limited to, browsing history, search history, and information regarding interaction with an Internet Website, application, or advertisement. Note that Carvana job applicants and/or Candidates should have no reasonable expectation of privacy with respect to their use of such Carvana-provided facilities.
- **Sensory information (e.g., audio, electronic, visual, thermal, olfactory or similar information)**, such as call recordings, photographs, building entry log information, or security camera footage in the public areas of Carvana’s facilities.
- **Professional or employment-related information**, such as resumes, interview notes, human resources and related records, payroll, board of directors appointments, and communications.
- **Education Information**. This may include educational information that is not publicly available personally identifiable information as defined by Family Educational Rights and Privacy Act.
- **Inferences**. Inferences drawn from any of the above information to create a profile about a job applicant or Candidate reflecting their preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes.

HOW WE USE PERSONAL INFORMATION

Your Personal Information may be processed for any one of the following purposes:

- **Auditing**. Auditing related to current interactions with Candidates and concurrent transactions.
- **Legal and Compliance Purposes**. Legal compliance requirements, compliance training, investigating and responding to claims against the Company and its customers and employees, due diligence purposes (like in connection with a corporate transaction), and other such purposes.
- **Security**. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity, environmental, health and safety, including monitoring and maintaining the security of the working environment with security cameras, maintenance of medical and sickness records and occupational health programs, keeping emergency contacts, behavioral safety, and statutory reporting obligations.
- **Debugging**. Debugging to identify and repair system, network and equipment errors that impair existing intended functionality of Carvana's systems, networks, and devices.
- **Performing Services**. Performing services on behalf of Carvana, or in relation to the administration of our relationship with you. This will include activities such as human resources administration, payroll and benefits, workforce management and administration, logistics, corporate travel and other reimbursable expenses, development and training, absence monitoring, timekeeping, performance appraisal, disciplinary and grievance processes, administration of termination of employment, reporting, career planning, talent management, relocation, workforce management and administration; real estate management; IT administration of our technologies, network, and intranet, and IT security management and tasks.
- **Research**. Undertaking internal research for technological development and demonstration, such as quality of products, logistics, enterprise resource planning and analytics, testing quality of products, technologies and services.
- **Quality Assurance**. Undertaking activities to verify or maintain the quality or safety of, and to improve, upgrade, or enhance, our services, products, and premises. This may include certain recordkeeping, such as accounting, commercial, procurement, document management and other similar activities. This may also include certain reporting functions, such as financial background checks, and consultancy and advisory services.

COMPLAINTS OR QUESTIONS

For questions regarding your personal information, please contact privacypolicy@carvana.com.