

Notice at Collection for California Applicants and Employees

Last Updated: January 2026

OPENLANE, Inc. and its related and/or affiliated businesses with applicants residing in California, including but not limited to individuals applying for employment with AutoVIN, Inc., AFC CAL, LLC, ADESA, Inc., Autoniq, LLC, Automotive Finance Corporation, PAR, Inc., OPENLANE, Inc., CarsArrive Network, Inc., Recovery Database Network, Inc., CarCo Technologies, Inc., Auction Frontier, LLC, CARWAVE, LLC, and Backlot Cars, Inc., (the “Company”) is providing you with this Notice at Collection For California Applicants and Employees (“**Notice**”) to inform you about the following:

1. the categories of Personal Information that the Company collects about applicants or employees who reside in California; and
2. the purposes for which the Company uses that Personal Information.

For purposes of this Notice,

- “Personal Information” means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a natural person that the Company collects about its applicants or employees, who reside in California, in their capacity as applicants for positions with, or employees of the Company.

Assistance for Disabled Applicants

Alternative formats of this Notice are available to individuals with a disability. Please contact <https://corporate.openlane.com/contact> for assistance.

Categories of Personal Information Collected

We collect the following categories of Personal Information. The specific pieces of data collected will depend on whether you are an applicant or an active employee.

1. Identifiers and Professional or Employment-Related Information



1.1 Personal Information Collected: The Company collects identifiers and professional or employment-related information, including the following:

Identifiers: real name, nickname or alias, postal address, telephone number, e-mail address, signature, online identifier, Internet Protocol address, driver's license number or state identification card number, and passport number. Post-offer, the Company also collects date of birth and social security number, bank account name and number for direct deposits, driver's license number or state identification card number, passport number, and corporate credit card number.

Professional or Employment-Related Information: membership in professional organizations, professional certifications, and employment history.

1.2 Purposes of Use:

Recruiting Applicants:			
•To evaluate applicants’ qualifications for employment with the Company •To communicate with applicants •To arrange and manage Company-sponsored events •To create a talent pool for future job openings •For accurate recordkeeping purposes	•To demonstrate applicants’ agreement to, or acceptance of documents presented to them, e.g., pre-employment arbitration agreement, acknowledgement of employment application, offer letter •To evaluate and improve the recruiting process		
<table><tr><th>Managing Employees:</th></tr><tr><td> ● To manage personnel and employment matters ● To set up a personnel file ● Career development activities ● To conduct employee surveys ● To engage in crisis management </td></tr></table>	Managing Employees:	● To manage personnel and employment matters ● To set up a personnel file ● Career development activities ● To conduct employee surveys ● To engage in crisis management	● To administer compensation, bonuses, equity grants, other forms of compensation, and benefits (as permitted by law) ● To manage vacation, sick leave, and other leaves of absence ● To provide training ● To evaluate job performance and consider employees for other internal positions
Managing Employees:			
● To manage personnel and employment matters ● To set up a personnel file ● Career development activities ● To conduct employee surveys ● To engage in crisis management			



• To fulfill recordkeeping and reporting responsibilities • To manage employee-related emergencies, including health emergencies • To promote the Company as a place to work • To arrange and manage Company-sponsored events and public service activities • Workforce reporting and data analytics/trend analysis • To design employee retention programs	• To develop a talent pool and plan for succession • To maintain an internal employee directory and for purposes of identification • To facilitate communication, interaction and collaboration among employees • To arrange team-building and other morale-related activities
Monitoring, Security, and Compliance:	
•To monitor use of Company information systems and other electronic resources •To conduct internal audits •To conduct internal investigations •To protect the safety and security of the Company's facilities, employees, customers and vendors	•To administer the Company's whistleblower hotline •To report suspected criminal conduct to law enforcement and cooperate in investigations
Conducting Our Business:	



• For communications with prospective, current, and former customers • To make business travel arrangements • To engage in project management	• To manage business expenses and reimbursements • To promote the business • To provide a directory and contact information for prospective and current customers and business partners
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2. Personal Information Categories from Cal. Civ. Code §1798.80(e)

The Company collects categories of Personal Information listed in Cal. Civ. Code §1798.80(e) (other than those already listed in “Identifiers,” above) as follows for the purposes listed below:

Applicants

- Medical information: to respond to an applicant’s medical emergency.

Employees

- Photograph and physical description: (a) for security and internal identification purposes, (b) to identify employees to co-workers, prospective and current customers, and other third parties; and (c) if applicable, to determine appropriate uniform sizes.

- Medical information: (a) to the extent necessary to comply with the Company’s legal obligations, such as to accommodate disabilities; (b) to conduct a direct threat analysis in accordance with the Americans with Disabilities Act and state law; (c) for workers’ compensation purposes; (d) for occupational health surveillance; (e) for occupational health and safety compliance and record-keeping; (f) to conduct fitness-for-duty examinations; (g) to administer leaves of absence and sick time; (h) to provide a wellness program; and (i) to respond to an employee’s medical emergency.

- Benefits information: to administer short- and long-term disability benefits.



3. Characteristics of Protected Classifications Under California or Federal Law

The Company collects information about race, age, national origin, disability, sex, and veteran status as necessary to comply with legal obligations, including the reporting requirements of the federal Equal Employment Opportunity Act, and California's Fair Employment and Housing Act, and for purposes of analytics.

The Company also uses this Personal Information for purposes including: (a) with respect to disability and/or medical condition, as necessary, to comply with Federal and California law related to accommodation; and (b) with respect to age, incidentally to the use of birth date for identity verification.

For employees, The Company also collects and uses Personal Information for purposes including: with respect to disability, medical condition, familial status, marital status, and pregnancy, childbirth, breastfeeding, and related medical conditions, as necessary to comply with Federal and California law related to leaves of absence and accommodation; with respect to military and veteran status, as necessary to comply with leave requirements under applicable law and for tax purposes; with respect to age, incidentally to the use of birth date for birthday celebrations and identity verification; with respect to religion and pregnancy, childbirth, breastfeeding, and related medical conditions, as necessary for accommodations under applicable law; with respect to protected classifications, such as national origin, to the extent this information is contained in documents that you provide in I-9 documentation; and with respect to marital status and familial status, for Company events and as necessary to provide benefits and for tax purposes.

The Company collects this category of Personal Information on a purely voluntary basis, except where collection is required by law, and uses the information only in compliance with applicable laws and regulations.

4. Commercial Information

4.1 Personal Information Collected: The Company collects commercial information, including the following: records of personal property; products or services purchased, obtained, or considered; or other purchasing or consuming histories or tendencies.

4.2 Purposes of Use: reimbursement of travel expenses, auditing, data and general security and preventing illicit activity.



5. Internet Or Other Similar Network Activity

5.1 Personal Information Collected: The Company collects information about applicants' and employees' use of the Internet or other similar network activity, including the following: browsing history, search history, log in/out and activity on the Company's electronic resources, information regarding an applicant's or employee's interaction with an Internet web site, application, or advertisement, and publicly available social media activity.

5.2 Purposes of Use: to monitor use of the Company's information systems and other electronic resources or information systems, to conduct internal audits, to conduct internal investigations, to protect the safety and security of the Company's facilities; and for employees, to impose discipline, and for training purposes.

6. Geolocation Data

6.1 Personal Information Collected: The Company collects geolocation data, including the following: information that can be used to determine an applicant's physical location, for example, through a radio frequency identification (RFID) chip in a security badge. For employees, the Company collects geolocation data, including the following: a) information that can be used to determine a mobile device's physical location; (b) information that can be used to determine a vehicle's physical location; and (c) information that can be used to determine an employee's physical location, for example, through a radio frequency identification (RFID) chip in a security badge.

6.2 Purposes of Use: for applicants, to confirm that an applicant has arrived and left Company facilities when scheduled, to manage applicant-related emergencies, to monitor the safety of the applicant, and to protect the safety and security of the Company's facilities; for employees, to assist with routing, to confirm that an employee has arrived and left an off-site work location, for customer service purposes, to provide training, to manage employee-related emergencies, to monitor the safety of an employee, to monitor compliance with Company policies, and to determine whether to discipline employees.

7. Sensory or Surveillance Data

7.1 Personal Information Collected: The Company collects sensory or surveillance data, including the following: for applicants, audio/visual



recordings of interviews and footage from video surveillance cameras; for employees, recordings of customer service telephone calls and footage from video surveillance cameras.

7.2 Purposes of Use: to protect the safety and security of the Company's facilities and personnel through video surveillance, and to monitor compliance with Company policies; also, for employees, to provide training, for quality assurance, and to determine whether to discipline employees.

8. Education Information

8.1 Personal Information Collected: The Company sometimes collects education information, including the following: academic transcripts.

8.2 Purposes of Use: to evaluate applicants' qualifications for employment with the Company, and for employees, to determine eligibility for tuition reimbursement.

9. Profile Data

9.1 Personal Information Collected: The Company collects profile data, including the following: behavior and personality analyses conducted by the Company, and profile data in connection with the Company's 360-degree feedback process.

9.2 Purposes of Use: to evaluate applicants' qualifications for employment with the Company; and for employees, to help assess their professional strengths and weaknesses, communication styles, management styles and preferences and overall effectiveness.

10. Biometric Information

10.1 As described in Section 2 above, the Company collects employee photographs, but the Company does not extract faceprints or other identifying metrics from employee photographs.

Purposes Potentially Applicable to Any of the Categories of Personal Information Listed Above

The Company also may use applicant and employee Personal Information to facilitate administrative functions and information technology operations and for legal reasons and corporate transactions. These functions include, but are not limited to the following:



- to manage and operate information technology and communications systems, risk management and insurance functions, budgeting, financial management and reporting, strategic planning;
- to manage litigation involving the Company, and other legal disputes and inquiries and to meet legal and regulatory requirements;
- in connection with a corporate transaction, sale, or assignment of assets, merger, divestiture, or other changes of control or financial status of the Company or any of its subsidiaries or affiliates; and
- to manage licenses, permits and authorizations applicable to the Company's business operations.

Selling and Sharing Information

- **Selling:** We do not sell your Personal Information to third parties.
- **Sharing:** We do not share your Personal Information for cross-contextual behavioral advertising without your consent.
- **Disclosures:** We may disclose your information to "Service Providers" (e.g., payroll processors, benefit providers) solely to perform services on the Company's behalf.

Data Retention and Destruction

The Company retains digital data indefinitely within its Human Resources Information System (HRIS) system of record. Human Resources related physical documents containing human resources data are retained for specific periods as defined by Company record retention requirements. Data subject rights requests and responses to such requests are retained for at least twenty-four (24) months from the date of the applicable request or response. Data that is no longer needed is securely destroyed, deleted or made anonymous.

Your Rights under CPRA

As a California resident, you have the right to the following:

1. Right to Know/Access: Request details about the Personal Information the Company collects and how we use it.
2. Right to Delete: Request the deletion of Personal Information (subject to legal exceptions like tax or labor law requirements).
3. Right to Correct: Request that we fix inaccurate Personal Information.



4. Right to Limit: Limit the use of your sensitive Personal Information to specifically allowed business purposes.
5. Right to Non-Discrimination: We will not retaliate against you for exercising your privacy rights.

How to Exercise Your Rights

You can make a request to the Company in relation to these rights at any time by:

- Writing to us at the following address:

OPENLANE, Inc., Privacy Office, 11299 N. Illinois Street, Suite 500, Carmel, IN 46032;

- Submitting a request via the Privacy Rights Portal: [OPENLANE](#);
- Sending an email to Privacy@OPENLANE.com; or
- Calling our toll-free number: 1-833-238-5089.