



# GPC Applicant and Teammate Privacy Notice

## APPLICANT AND TEAMMATE PRIVACY NOTICE

LAST UPDATED: February 15, 2024

Since 1928, Genuine Parts Company has set the standards for performance and value for our customers and our stakeholders. Today, we're proud to say we're the largest global auto parts network and a leading industrial parts distributor, one that offers rewarding careers that combine small company feel with a global scale. Our strengths are in the relationships we build and the value we deliver by merging local expertise with a global force.

Like nearly all businesses, Genuine Parts Company and our operating divisions, subsidiaries, affiliates and branches worldwide (collectively, "GPC" "us" or "we", including but not limited to UAW, Motion and NAPA) collect and use personal information. This Applicant and Teammate Privacy Notice ("Notice") explains the kinds of information we may collect, how we intend to use and share that information, and the rights you may have related to our use of your personal information.

This Notice applies to GPC applicants and prospective employees (collectively, "Applicants") and employees, contractors, contingent and other personnel (collectively, "Teammates") regardless of location if we collect your personal information during our human resources operations, in processing a job application you submit, throughout the course of your tenure with GPC, and following any such employment or services with us (collectively, our "Human Resources Operations"). This Notice only applies to data that we collect and process when interacting with you in your capacity as an Applicant or Teammate. Unless otherwise indicated on a specific website page or form, this Notice DOES NOT apply to any personal information that we process through your use of our public-facing websites, applications, or services, which are subject to our [Privacy Notice](#).

In general, we collect and process personal information from Applicants and Teammates for Human Resources Operations, health and safety, security, business-related purposes, and to maintain legal compliance or enforce our legal rights. We may also monitor Applicant and Teammate use and activity on our systems and networks.

### INFORMATION WE MAY COLLECT

We may **directly collect** different types of personal information from Applicants and Teammates including some categories of Sensitive personal information, for purposes of our Human Resources Operations in accordance with applicable law. Examples of personal information we may collect, directly or through our service providers, are provided below by category:

- **Profile/Demographic Information.** Full name, physical address, personal phone number, work phone number, personal email address, work email address, workplace address, social media account information, photograph, and emergency contact information.
- **Job Applicant Information.** All information related to a job application such as resume, education, experience, background, preferences, attributes, references, licenses, certificates, ethnicity, military and veteran status, race, gender, residency status, work permit status and other similar information becomes part of your employment file when you are hired.
- **Teammate Information.** Teammate name, job title, position within the company, wage, salary, bonuses, rewards, awards, performance ratings, performance reports, complaints, investigative reports, disciplinary actions, achievements, promotional considerations, job progress, protected class membership, military status, work permit status, residency status, driver's license number, Social Security number, Social Insurance Number, individual tax identification number, tax ID, residency number, passport number, visa number, immigration status, insurance number, citizenship certificate or papers, information in government forms, other tax information, workplace address, voicemails, emails, correspondence, documents, other work product and communications, information captured on security systems and key card entry systems, usage and activity on company information technology networks, devices, and other systems, vaccination status, medical test results required for workplace access, policy acknowledgments, time entry records, sick pay, paid time off, information about spouse, partner and dependents (including birthdate, phone number, social security number, tax ID). Where permitted by law and applicable, this information may include the results of credit and criminal background checks, the results of drug and alcohol testing, screening, health certifications, driving license number, vehicle registration, driving history, and other verifications.
- **Benefits Information.** Medical insurance information, dental insurance information, retirement account information, life insurance information, name, phone number, Social Security number, birthdate, bank information, account number, routing number, information about a Teammate's spouse, partner, and dependents to the extent necessary to administer benefits.
- **Medical and Disability Information.** To the extent applicable to a Teammate's role and position and permitted or required by law, medical records, health statistics, medical conditions, disabilities, health assessment results, vaccination status, and medical test results if and as required for workplace access.
- **Payments Information.** We will collect Teammate name, address, birthdate, Social Security number, Social Insurance Number, and as applicable, salary deduction authorization, bank information, account number and routing number. To the extent a Teammate is issued a corporate credit card, we may also collect information related to the use of the issued corporate card such as transaction history, card

balance, and card limit.

- **Equity and Tax Information.** To the extent a Teammate is eligible for GPC's equity or profit-sharing plans, we will maintain records of equity grants, vesting and other conversion events as well as information necessary to assess, collect, and pay, applicable taxes in compliance with applicable law.
- **Posting on Intra-Company Sites.** We may offer intra-company accessible sites, pages, messaging channels, blogs, or forums (**Intra-Company Sites**<sup>™</sup>). We and other individuals who use the Intra-Company Sites may collect the information you submit or make available through these sites. If you choose to submit content to any public area of the Intra-Company Sites, such content will be considered "public" and may not be subject to the privacy protections set forth herein.
- **Biometric information collection.** While we do not generally collect biometric information, we may collect limited biometric information, including potentially employee fingerprints in high-security situations. In these situations, the biometric information will only be used and managed pursuant to the terms that are disclosed to you prior to collection.

We may also **automatically collect** certain information from and about you in your capacity as a GPC Teammate, specifically:

- **Device Information.** GPC may collect the internet protocol (IP) address, inferred location based on your IP address or activities, device identifiers associated with your computer or device, mobile carrier and related information, activity logs, browsing history, search history, information regarding your interaction with a website and other information about activities you engage in while working with GPC, and on our equipment, accounts, systems, and networks.
- **System Monitoring.** To fulfill our business needs and as permitted or required by applicable law, GPC may monitor and review Teammates' use of GPC equipment, accounts, information technology systems and networks including its phone networks, computer networks, including those used to access the Internet, videoconferencing systems and other company-provided electronic communications tools to ensure organizational security, monitor appropriate use and to support IT operations. GPC may also access and review electronic files, messages, and emails sent or stored on its information technology systems, including accounts, computers and devices provided to Teammates.
- **CCTV Footage.** GPC may monitor its premises using CCTV cameras.
- **Location Information.** Where permitted by law, we may collect precise location information in connection with your use of certain GPC's owned assets such as vehicles, or to locate and/or remote wipe a lost or stolen company device.

**TO THE MAXIMUM EXTENT PERMITTED BY LAW, YOU HAVE NO EXPECTATION OF PRIVACY WHILE ON OUR PREMISES OR USING OUR INFORMATION TECHNOLOGY SYSTEMS, NETWORKS, AND ELECTRONIC COMMUNICATION TOOLS. THIS NOTICE DOES NOT ESTABLISH, AND SHOULD NOT BE CONSTRUED TO MEAN, THAT ALL TEAMMATES WILL HAVE ACCESS TO, OR WILL PARTICIPATE IN, THE SYSTEMS, NETWORKS, DATA, PROGRAMS AND OTHER BUSINESS ACTIVITIES DESCRIBED IN THIS NOTICE.**

**Information from Other Sources.** We may collect or receive information about you from other sources, including through third-party services and organizations to supplement the information provided by you. For example, where permitted or required by law, we may conduct background and credit checks on you prior to, or during your tenure as a GPC Teammate.

**Miscellaneous Information.** We may receive or collect other information (for example, information you choose to disclose during the interview process, whether in oral or written form, opinions generated during the interview process, and information provided to us during performance reviews).

## HOW WE USE YOUR INFORMATION

We may process personal information for a variety of Human Resources Operations, including:

- **To Recruit, Onboard and Support New Teammates.** We may process personal information to assess your suitability, aptitude, skills, qualifications, and interests for employment with or provision of services to GPC; to communicate with Applicants about the application process and/or an Applicant's application, to assist you in entering a relationship with us as a Teammate, and at your request, to assist you with a work permit or immigration visa.
- **To Maintain Teammate Profiles and Contact Information.** We maintain profiles for each of our Teammates to enable collaboration and communication. Teammate profiles that are made available through the internal GPC directory may include personal information such as Teammate name, corporate location, work phone number, corporate email address, job title, job role, and reporting line(s). Based on job role, we may also maintain Teammate biographies, including photographs and professional contact information, for certain individuals – for example, individuals with externally-facing roles and responsibilities such as sales representatives, communication directors or other members of corporate leadership. We may publish such Teammate biographies on our website(s) or provide them to our business partners where appropriate. Finally, we maintain personal information for Teammates such as their emergency contacts for the purpose of communicating to a designated third person in the event of a medical emergency, natural disaster, or other health and safety event. (Emergency contact information is not published or otherwise shared as outlined above.)
- **To Administer Payroll and Benefits**
  - We use Teammate bank account information, including the account name, name of financial institution, routing number and account number to conduct payroll activities. For example, we use Social Security number, Social Insurance Number, or other tax ID, to process the required withholding tax, payroll tax, and any other relevant payroll taxes. We also may be required to honor other deductions such as court-ordered wage garnishments or other payroll deductions determined by regulation.
  - We may process personal information to provide medical, dental, vision, retirement, and other insurance or other benefits to eligible Teammates through third-party service providers who process Teammate personal information on our behalf and at our instructions. We process other information such as medical insurance account details and other pre-tax benefit deductions made as part of the payroll process.
- **To Manage Teammate Performance and Compensation.** We process personal information to record Teammate performance, including achievements and progress, determine performance ratings, bonuses, and awards, to identify individuals for promotional consideration and

to conduct organizational development and succession planning. As part of our Human Resources Operations, personal information will also be processed to manage workplace attendance and absence.

- **To Conduct Business Operations.** We may use your personal information for a variety of business operations including diversity and inclusion initiatives, workflow management, such as assigning, managing, and administering projects, Human Resources Operations administration and communications, providing helpdesk and or IT support services, registering Teammates for events, conferences, software licenses, travel, and to administer corporate credit card programs. We would also process your personal information in the event of an acquisition, divestiture, reorganization, restructuring, relocation, integration, or any other corporate transaction affecting Teammates.
- **With Your Consent.** We may use your personal information at your request or with your consent.
- **To Protect our Business Interests and Comply with Our Legal Obligations.** To protect our interests as a company (for example, preventing fraud, ensuring network and information security, making disclosures to affiliated organizations for administrative tasks, monitoring our workforce for safety or management purposes, enforcing our legal claims, research purposes, conducting internal and/or participating in external or governmental compliance investigations, and cooperating with internal or external audits), and where it is necessary to comply with our legal obligations or establish, exercise, or defend legal claims we have or may have.

## HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We may disclose your personal information with the following types of recipients:

- **Displaying to Other Individuals and Teammates.** As described above, we may maintain profiles of our Teammates which may be available on our intranet. In some cases, portions of a Teammate's profile may be publicly available or provided to business customers where such disclosure is relevant to the Teammate's role and responsibilities (i.e., various GPC business representatives).
- **Vendors and Third-Party Service Providers.** We use vendors and third-party service providers. The types of service providers to whom we entrust personal information include service providers for maintaining our Human Resources Operations to administer payroll, benefits, Teammates' compensation, travel and expenses, asset management, and health and safety. (For benefits such as medical insurance and retirement, personal information may be provided directly by you to the third-party service provider.) We also use third-party service providers for the provision of IT and related services like cloud hosting, analytics, device management, remote access, information security or other technical services.
- **Regulatory Bodies and Authorities.**
  - We will share with the relevant federal, state, provincial, and local tax authorities your name, address, telephone number, government issued identification information or other required identification numbers, birthdate, wages or salary, and any other required Employee Benefits Information.
  - In addition, we may share your personal information with law enforcement, courts of law, government agencies, regulatory authorities, or other third parties as required by law or to meet our contractual obligations, or if we, in good faith, believe that disclosure is otherwise necessary or advisable.
  - We will share certain demographic data with governmental bodies where required, including but not limited to protected veteran status, gender, sex, sexual orientation, disability, ancestry, racial or ethnic origin, age, and age. This data is generally collected from you on an elective basis unless it is necessary for us to collect such information to comply with our legal obligations. We do not collect or disclose the information in a form that constitutes personal information (i.e., we disclose aggregate data across the GPC workforce).
- **Entities Associated with Mergers, Acquisitions and Other Business Transfers.** GPC may be part of a merger, acquisition, financing due diligence, reorganization, asset purchase, bankruptcy, receivership, sale of company assets, transition of service or other business transfer. We may disclose your personal information as part of such process as permitted and/or required by law and/or contract.
- **Affiliates and Subsidiaries.** We may share personal information with our affiliates and subsidiaries for our and our affiliates' and subsidiaries' internal business purposes.
- **Disclosures to Protect Us or Others.** We may access, preserve, and disclose your personal information if we believe doing so is required or appropriate to: (i) comply with law enforcement or national security requests and legal processes, such as court orders or subpoenas; (ii) protect your, our, or others' rights, property, or safety; (iii) enforce our policies or contracts; (iv) collect amounts owed to us; or (v) assist with an investigation or prosecution of suspected or actual illegal activity.

## INTERNATIONAL DATA TRANSFERS

All personal information sent to, collected through, or collected by GPC may be stored anywhere in the world, including but not limited to, in the United States, in the cloud, our servers, the servers of our affiliates or the servers of our service providers to carry out our Human Resources Operations. Your personal information may be accessible to law enforcement or other authorities pursuant to a lawful request. We endeavor to protect your personal information consistent with the requirements of applicable laws.

## YOUR PRIVACY RIGHTS

In accordance with applicable law, you may have the right to:

- **Access and "port" your personal information,** including: (i) requesting confirmation of whether we are processing your personal information; (ii) obtaining access to or a copy of your personal information; (iii) receiving an electronic copy of personal information that you have provided to us, or ask us to send that information to another company (the "right of data portability").
- **Request restriction of or object to our processing of your personal information,** including the right to: (i) withdraw your consent to processing, (ii) object to or restrict our uses of your Sensitive personal information for certain purposes, or (iii) opt out of profiling in furtherance of decisions that produce legal or similarly significant effects concerning you, if applicable, where each such requests are

permitted by law.

- **Request correction of inaccurate or incomplete personal information.** In some cases, we may provide self-service tools that enable you to update your personal information, or we may refer you to the third-party who is the controller of your personal information who is able to make the correction.
- **Request deletion of personal information,** subject to certain exceptions prescribed by law.

You have the right to not receive discriminatory treatment or be retaliated against for exercising any of these rights. If you would like to exercise any of these rights, please contact us as set forth below. We will evaluate and process such requests in accordance with applicable laws. To protect your privacy, GPC will take steps to verify your identity before fulfilling any valid request.

You may also authorize an agent to exercise the personal information rights described above. To authorize an agent, provide written authorization signed by you and your designated agent and Contact Us as set forth below for additional instructions.

## DATA RETENTION

GPC retains the personal information we receive as described in this Privacy Notice for as long as necessary to fulfil the purpose(s) for which it was collected, carry out our Human Resources Operations, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, comply with applicable laws, or based upon other criteria, including, but not limited to, the sensitivity and volume of such data. We endeavor to retain all personal information in accordance with legal retention requirements and reserve the right to reasonably refuse to delete personal information if deleting such personal information would prevent us from meeting compliance obligations, or otherwise exercising or defending our legal claims.

## SECURITY OF YOUR PERSONAL INFORMATION

We use technical and organizational measures to protect the personal information that we store, transmit, or otherwise process against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. We regularly consider appropriate new security technology and methods as we maintain and develop our software and systems. Unfortunately, no online environment can be guaranteed to always be secure, and we cannot ensure or warrant the security of any information you provide to us. To the fullest extent permitted by applicable law, we do not accept liability for unintentional disclosure. If we learn of a data breach that is likely to affect the security of your personal information, we will notify you consistent with our legal obligations.

## THIRD PARTY WEBSITES/APPLICATIONS

Various internal GPC applications may contain links to third-party websites/applications and other websites/applications may reference or link to our sites or resources. These third-party services are not controlled by us. We encourage you to read the privacy policies of each third-party website and application as we do not endorse, screen, or approve, and are not responsible for the privacy practices or content of such other websites or applications. Visiting these other websites or applications is at your own risk.

## EFFECTIVE DATE, CHANGES TO OUR PRIVACY NOTICE AND PRACTICES

This Notice is effective as of the "Last Updated" date indicated at the top. We may revise this Notice from time to time at our sole discretion. If there are any material changes to this Notice, we will notify you as required by applicable law. You understand and agree that you will be deemed to have accepted the updated Notice if you continue your engagement with or provide services to GPC after the new Notice takes effect. If at any point you do not agree to any portion of the Notice in effect, Contact Us as set forth below.

## CONTACT US

For present and former Teammates, the controller of your personal information is the GPC entity that is or was your employer. For Applicants, the party responsible for (i.e., the controller of) your personal information is the GPC entity to which you have applied for a role. For contract Teammates, the GPC entity to which you provide services will be the controller of your personal information. Genuine Parts Company is also a controller of certain personal information of Applicants and Teammates mentioned above.

If located in the United States:

If you have any questions about our privacy practices or this Notice, please contact us by email at [gpc\\_privacy@genpt.com](mailto:gpc_privacy@genpt.com) or by postal mail at Genuine Parts Company, Attention: Human Resources Department, 2999 Wildwood Parkway, Atlanta, GA 30339.

If located in Canada:

If you have any questions about our privacy practices or this Notice, please contact us by email at [data.privacy@uapinc.com](mailto:data.privacy@uapinc.com) or by postal mail at UAP Incorporated, Attention: Human Resources Department, 7025 Ontario Street East, Montreal, Quebec H1N 2B3.

## NOTICE AT COLLECTION AND SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS

Category of Personal Information Collected	Category of Third Parties to which Information is Disclosed

<p><b>Identifiers</b></p> <p>A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number or other similar identifiers.</p>	<ul style="list-style-type: none"> <li>● Service Providers</li> <li>● Government entities</li> <li>● GPC affiliates</li> <li>● Benefit Providers</li> </ul>
<p><b>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</b></p> <p>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p>	<ul style="list-style-type: none"> <li>● Service Providers</li> <li>● GPC affiliates</li> <li>● Benefit Providers</li> </ul>
<p><b>Sensitive personal information</b></p> <p>A social security, driver's license, state identification card, or passport number, an account log-in, financial account, debit card or credit card number in combination with any required security or access code, password, or credentials allowing access to an account, precise geolocation, racial or ethnic origin, religious or philosophical beliefs, or union membership, contents of a Teammate's mail, email, and text messages unless the business is the intended recipient of the communication, or genetic information.</p>	<ul style="list-style-type: none"> <li>● Service Providers</li> <li>● Government entities</li> <li>● GPC affiliates</li> <li>● Benefit Providers</li> </ul>
<p><b>Protected classification characteristics under California or federal law</b></p> <p>Age (40 years or older), race, color, ancestry, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	<ul style="list-style-type: none"> <li>● Government entities</li> <li>● GPC affiliates</li> <li>● Benefit Providers</li> </ul>
<p><b>Geolocation data</b></p> <p>Physical location or movements (of Company-owned vehicles or devices)</p>	<ul style="list-style-type: none"> <li>● Service Providers</li> <li>● GPC affiliates</li> </ul>
<p><b>Professional or employment-related information</b></p> <p>Current or past job history or performance evaluations.</p>	<ul style="list-style-type: none"> <li>● GPC affiliates</li> </ul>

The categories of sources from which we collect personal information are described above in the section titled INFORMATION WE MAY COLLECT. We use the data we collect about you for the business purposes described above in the section titled HOW WE USE YOUR INFORMATION. In addition, we may share any data we hold about you with the parties described above.

**Data Retention.** The DATA RETENTION section above outlines the criteria we utilize for determining how long to retain data including your personal information.

**Sensitive Personal Information.** Processing of sensitive personal information is carried out exclusively for the purposes outlined above, to the extent permitted under law. This processing activity may include service providers and government entities.