

# CALIFORNIA EMPLOYEE PRIVACY POLICY

Effective Date: 12/20/2022

GATX Corporation and its affiliated entities (“**GATX**”) are committed to respecting your privacy and protecting your personal information. This California Employee Privacy Policy applies to any of our employees, contractors, job applicants, prospective employees, and former employees who are California residents and about whom we have collected personal information for employment-related purposes only, including in the course of employment or application for employment with us (collectively, “**you**”).

We provide this California Employee Privacy Policy to comply with applicable privacy laws, including the California Consumer Privacy Act of 2018 and as amended by the California Privacy Rights Act of 2020 (together, the “**CCPA**”). The CCPA provides California residents with rights to receive certain disclosures regarding the collection, use, and sharing of personal information, as well as rights to access, correct, delete, and restrict the sale, use, and disclosure of certain personal information we collect about them, unless exceptions apply. California residents also have the right not to receive discriminatory treatment by us for the exercise of your privacy rights under the CCPA. If you are a California resident, you may submit a request to exercise these rights by emailing us or by accessing the [GATX Ethics and Compliance Portal](#) using the information provided in the [Your Privacy Rights](#) section below.

For the purposes of this Policy, except where a different definition is noted, “**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. Personal information does not include publicly available information; lawfully obtained, truthful information that is a matter of public concern; information that has been de-identified or aggregated; or other information covered by certain sector-specific privacy laws, as consistent with state law. Any capitalized term used and not otherwise defined below has the meaning assigned to it in our [Privacy Policy](#).

This California Employee Privacy Policy governs personal information collected for employment-related purposes only. To learn more about our privacy practices with respect to personal information collected about consumers and other individuals for purposes unrelated to employment, please refer to our [Privacy Policy](#).

If you are a visually impaired individual, an individual with another disability, or an individual seeking support in another language, you may access this California Employee Privacy Policy by emailing us at [contactgatx@gatx.com](mailto:contactgatx@gatx.com).

# 1. Personal Information We Collect

GATX may collect, or has collected, the following categories of personal information over the past twelve (12) months:

- a. **Identifiers**, which includes first and last name; home address; personal email address; telephone number; employee or personnel number; other account or user identification information; driver's license information; and emergency contact details.
- b. **Professional or employment-related information**, which includes job application details; current employment; employment history; salary, wages, and other compensation data; benefits and entitlement data; bonus payments and amounts; company or entity; business unit or division; employment contract information; employment start date; employment end date; hours of work; job title or role; manager/supervisor; office location; employee key card or access card use data; travel booking details; travel history; performance ratings; professional memberships; background check references and related information; military service records and related documentation; employment visa and sponsorship status; and any disciplinary action and/or reason for termination.
- c. **Education information**, which includes academic transcripts; awards or honors; degrees earned; education and training history; grades; languages spoken; and other qualifications and certifications.
- d. **Personal information described in California Civil Code § 1798.80(e)**, which includes bank account numbers, credit or debit card numbers, and other financial information; insurance policy numbers; medical conditions; workplace accommodations and related documentation; FMLA calculations and related leave records; worker's compensation claim information; other medical and health insurance information; and physical characteristics or description.
- e. **Characteristics protected under California or federal law**, which includes your date of birth, age, or age range; criminal history; criminal records; disability status; drug test results; gender or gender identity; income level; marital status; military or veteran status; nationality; pregnancy status; racial or ethnic origin; sexual orientation; trade union membership; as well as similar information about your household members and dependents.
- f. **Internet or other electronic network activity information**, which includes cookie identifiers; browser software; your computer's operating system; the website that referred you to our site and/or the search terms you entered into a search engine to reach our site; internet service provider ("ISP"); date/time stamp; device platform, version, and other device characteristics which may include settings such as Wi-Fi, Bluetooth, and Global Positioning System ("GPS").

- g. **Geolocation data**, which includes GPS data; locational information based upon your IP address; cell network data; and other similar locational data which may be collected from various devices including your personal and employer-issued mobile device(s) and your employer-issued vehicle.
- h. **Audio, electronic, visual, thermal, olfactory, or similar information**, which includes photographic images; call and voicemail recordings; and video surveillance data.
- i. **Biometric information**, which includes temperature checks or other health assessments.
- j. **Inferences** drawn from the personal information listed above.

Please note that because of the overlapping nature of certain of the categories of personal information identified above, which are required by state law, some of the personal information we collect may be reasonably classified under multiple categories.

**Sensitive personal information.** Certain of the personal information that we collect, as described above, may constitute “**sensitive personal information**” under California law, including:

- Social Security number, driver’s license, state identification card, or passport number;
- Account log-in number combined with required security or access codes, passwords, or other credentials allowing access to an account;
- Precise geolocation;
- Racial and/or ethnic origin;
- Trade union membership;
- Gender or gender identity;
- Personal information concerning health; and
- Personal information concerning sex life or sexual orientation.

## 2. Sources of Personal Information

We may collect personal information about you from the following categories of sources:

- **From you**, including from your employment application and/or over the course of your employment, such as in-person or via email, telephone, electronic messaging, postal mail, social media, or other means.
- **From other individuals**, including recruiters and temporary job placement agencies, and our other employees and contractors.

- **From our service providers**, including providers of background checks and credit checks; communications and analytics providers; internet service providers; operating systems and platforms; data brokers; and fraud solutions.
- **From government entities**, to assist in providing employee benefits and services to you.

We may supplement the information described above with information we obtain from other sources, including from both online and offline data providers.

### **3. How We Use Your Personal Information**

We may use the personal information we collect from you for the following purposes:

- To facilitate employment, including conducting screenings, interviews, and background checks;
- To facilitate employee training;
- To communicate with our employees;
- To manage our workforce, including to complete performance reviews, evaluations, and internal investigations;
- To administer payroll and benefits to our employees and their dependents;
- To protect the health and safety of our workforce;
- To provide you with services, products, discounts, and other benefits related to your status as an employee;
- To operate our systems, including IT, maintenance, and security;
- To limit, protect, or otherwise restrict physical access to our offices and facilities, including areas with sensitive data;
- To maintain and improve the quality of our employee sites, services, and benefits;
- To grow our business, including to perform research and development, and understand the effectiveness of our marketing;
- To ensure legal compliance, manage risk, and audit our business, including to respond to subpoenas, court orders, and legal process, or to establish or exercise our legal rights or defend against legal claims; and
- To meet our obligations for taxes and other government filing requirements.

The sensitive personal information that we collect as described in Section 1 above may be used for any of the above purposes.

We will retain personal information for as long as needed or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with you; (ii)

whether there is a legal obligation to which we are subject; (iii) whether there is a privacy right for which the personal information has been exercised (such as a request to delete); and (iv) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

## 4. Who We Disclose Your Personal Information To

We do not sell or share your personal information as those terms are defined under California law. We may disclose your personal information with the following categories of service providers and third parties:

- **Our other employees.** We may disclose your personal information with our other employees consistent with the purposes identified in Section 2 above.
- **Our affiliates.** We may disclose your personal information with our affiliates consistent with the purposes identified in Section 2 above.
- **Service providers.** We may disclose your personal information with our service providers to provide services on our behalf, such as providers of background and credit checks, HR and payroll processing, analytics, hosting, technical support, and other services. These third parties have access to your personal information only to perform these tasks on our behalf and are obligated not to disclose or use the information for any other purpose.
- **Affiliate and business transfer.** If GATX is involved in a merger, acquisition or asset sale, your personal information may be transferred. We will provide notice before your personal information is transferred and becomes subject to a different privacy policy.
- **Legal compliance and harm prevention.** We may disclose your personal information as we believe necessary (i) to comply with applicable law, rules and regulations; (ii) to enforce our contractual rights; (iii) to investigate possible wrongdoing in connection with our company; (iv) to protect and defend the rights, privacy, safety and property of GATX, you or others; and (v) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities.

## 5. Your Privacy Rights

If you are a California resident, you have the right to make the following requests under applicable California law in relation to your personal information, subject to certain exceptions:

- **Right to Know.** You have the right to, up to twice in a 12-month period, request what personal information we collect, use, disclose, and/or sell, and to whom, as applicable.
- **Right to Delete.** You have the right to request, under certain circumstances, the deletion of your personal information that we collect.
- **Right to Opt-Out of Sale or Sharing.** You have the right to opt-out of the sale or sharing of your personal information as those terms are defined under California law. Please note that GATX does not currently sell or share personal information that is subject to this Employee Privacy Policy.
- **Right to Non-Discrimination.** You have the right not to receive discriminatory treatment for the exercise of the privacy rights described above.
- **Right to Limit Use and Disclosure.** You have the right to limit the use or disclosure of your sensitive personal information to only the uses necessary for us to provide employment-related services to you. We will not use or disclose your sensitive personal information after you have exercised your right unless you subsequently provide consent for the use of your sensitive personal information for additional purposes.
- **Right to Correct.** You have the right to request the correction of your inaccurate personal information.

**How to submit a request.** You may exercise any of the rights described in this section by emailing us at [contactgatx@gatx.com](mailto:contactgatx@gatx.com), by utilizing our [GATX Ethics and Compliance Portal](#) and following the instructions, or by calling **1-800-461-9330**.

Any request you submit to us is subject to an identification and residency verification process (“**Verifiable Consumer Request**”) as permitted by the CCPA. We will not fulfill your request unless you have provided sufficient information that enables us to reasonably verify that you are the consumer about whom we collected the personal information on. To verify you, you must provide us with your first name, last name, and last four digits of your Social Security number or your date of birth. These rights are also subject to various exclusions and exceptions under applicable laws.

You may also designate an authorized agent, in writing or through a power of attorney, to request to exercise the above rights on your behalf. If you should use an authorized agent to exercise your various rights under the CCPA, we may require that you provide your authorized agent with written permission to exercise your various rights and to verify your own identity with us. If your authorized agent does not submit proof that they have been authorized by you to submit verified requests for disclosure and deletion, we reserve the right to deny such a request that we have received and will explain to your authorized agent why we have denied such request. The authorized agent may submit a request to exercise these rights by emailing the letter of authorization or power of attorney to [contactgatx@gatx.com](mailto:contactgatx@gatx.com).

We currently do not collect household data. If we receive a request submitted by all members of a household, we will individually respond to each request. We will not be able to comply with any request by a member of a household under the age of 13, as we do not collect personal information from any person under the age of 13.

We will respond to your request within forty-five (45) days after receipt of a Verifiable Consumer Request for a period covering twelve (12) months and for no more than twice in a twelve-month period. We reserve the right to extend the response time by an additional forty-five (45) days when reasonably necessary and provided consumer notification of the extension is made within the first forty-five (45) days.

## **6. Contact Us**

If you have any questions about this Privacy Policy or wish to exercise one of your privacy rights, please contact us using the following information:

GATX Corporation  
233 S Wacker Drive  
Chicago, IL 60606-7147  
[contactgatx@gatx.com](mailto:contactgatx@gatx.com)  
312.621.6200 or 800.428.8161

or at

GATX Corporation  
233 S Wacker Drive  
Chicago, IL 60606-7147  
Attention: Chief Privacy Officer, Niyi Adedoyin  
[PrivacyOfficer@gatx.com](mailto:PrivacyOfficer@gatx.com)