

CWGS California Applicant Privacy Policy

Last Updated: January 1, 2023

This California Applicant Privacy Policy (“**Applicant Policy**”) describes our Personal Information processing practices with respect to the Personal Information we process about applicants/candidates for employment with the Camping World and Good Sam family of companies (“**CWGS**,” “**we**,” “**our**,” “**us**,” or the “**Company**”) and who are California residents (each an “**Applicant**” or “**you**”). This Applicant Policy is intended to satisfy the requirements of the California Consumer Privacy Act of 2018 (as amended by the California Privacy Rights Act of 2020), codified at Cal. Civ. Code §§ 1798.100 - 1798.199.100, and its implementing regulations (collectively, the “**CCPA**”).

Table of Contents

1. **Scope and Relation to Other Policies**
2. **Personal Information We Collect**
3. **Sources of Personal Information**
4. **Purposes for Which Personal Information is Collected, Used, and Disclosed**
5. **How We May Disclose Personal Information**
6. **How We Retain Personal Information**
7. **Security of Personal Information**
8. **Updating Your Personal Information**
9. **Your Rights Under the CCPA**
10. **Changes to this Applicant Policy**
11. **Contact Us**

1. Scope and Relation to Other Policies

This Applicant Policy applies to the Personal Information we collect from Applicants who are California residents and who apply to work with us.

For purposes of this Applicant Policy, “**Personal Information**” is any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you (subject to some exemptions under the CCPA). This Applicant Policy **does not** address or apply to our information practices that are not subject to the CCPA, such as:

- **Business Information.** Company or business information such as trade secrets, proprietary information, intellectual property, privileged or investigative materials, and information that helps secure the integrity of Company assets.
- **Publicly Available Information.** Information that is lawfully made available from federal government records and information we have a reasonable basis to believe is lawfully made available to the general public by you or by widely distributed media or by a person to whom you have disclosed the information and not restricted it to a specific audience.
- **Aggregated and Deidentified Information.** Information that is aggregated or deidentified in accordance with applicable laws.
- **Protected Health Information.** Information governed by the Health Insurance Portability and Accountability Act or California Confidentiality of Medical Information Act.
- **Activities Covered by the Fair Credit Reporting Act (“FCRA”).** This includes information we receive from consumer reporting agencies that are subject to the FCRA

(e.g., information contained in background check reports we obtain as part of our vetting process).

This Applicant Policy also does not apply to the Personal Information we collect from our customers, contractors, employees, or our Applicants in the context of their personal use of our products and services, which are subject to different notices. For additional information on our general privacy practices, please visit our online privacy policy, available on our consumer-facing websites.

We may provide Applicants additional notices about our information practices that are covered by other laws (e.g., if we conduct a background check).

2. Personal Information We Collect

The following identifies the categories of Personal Information we collect about Applicants (and have collected in the prior 12 months), as enumerated by the CCPA. Some Personal Information included in the categories below may overlap with other categories.

- **Identifiers.** Such as name, alias, title, address, telephone number, personal email address, date of birth, unique personal identifier, online identifier, Internet Protocol (IP) address, social security number, driver's license number, state identification card number, passport number, or other similar identifiers.
- **Protected Classifications.** Such as age, race, national origin, citizenship, marital status, sex, veteran or military status, and other characteristics of protected classifications under California or federal law.
- **Professional or Employment-Related Information.** Such as employment history, qualifications, licensing, and any other related information.
- **Education Information.** Such as education records, including grades, transcripts, student disciplinary records, and any other information you choose to provide, and information about education history and 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).
- **Internet or Other Electronic Network Activity Information or Usage Data ("usage data").** Such as network activity information or usage data including, browsing history, search history, clickstream data, as well as interactions with our portals, websites, applications, platforms, and if applicable, advertisements, used to recruit you as a candidate for employment with us.
- **Audio, Electric, Visual, or Similar Information.** Such as audio, electronic, visual, and similar information, including information collected via call recordings, recorded meetings, videos, photographs, and CCTV footage.
- **Inferences.** Such as inferences drawn from any of the information described in this section reflecting your preferences.
- **Sensitive Personal Information.** Such as social security number, driver's license number, state identification card number, passport number, and racial or ethnic origin.

3. Sources of Personal Information

We generally collect Personal Information identified above from the following categories of sources:

- Directly from you
- Recruiters and recruiting platforms/applications

- Employee referrals
- References you provide
- Former employers
- Our service providers, representatives, and agents

4. Purposes for Which Personal Information is Collected, Used, and Disclosed

We generally collect Personal Information as reasonably necessary for the following business or commercial purposes:

- **Recruiting and Hiring.** To evaluate your qualifications and eligibility for employment, including scheduling interviews, evaluating qualifications, extending offers, communicating with Applicants, and maintaining Applicant information for future consideration, workforce planning, and supporting our equal opportunity employment practices.
- **Compliance with Legal Obligations.** Related to our compliance with applicable legal obligations including employment and labor, Social Security and tax, and other applicable laws, regulations, opinions, and guidance.
- **Securing Premises.** To secure our offices, premises, and assets, including through the use of electronic access systems, and to investigate privacy, security, or workplace-related incidents.
- **Auditing, Accounting, Reporting, and Corporate Governance.** To conduct financial, tax, and accounting audits; audits and assessments of our business operations, privacy, security, and financial controls, and compliance with legal obligations; our general business, accounting, record keeping, and legal functions and to maintain appropriate business records and enforce company policies and procedures.
- **Mergers, Acquisitions, and Other Business Transactions.** For purposes of planning, due diligence, and implementation of commercial transactions, such as mergers, acquisitions, reorganizations, bankruptcies, and other business transactions, such as financings, and 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 legal disputes, to respond to legal claims or disputes, and to otherwise establish, defend, or protect our rights or interests.

Notwithstanding the purposes described above, we do not collect, use, or disclose “sensitive personal information” about Applicants beyond the purposes authorized by the CCPA. Accordingly, we only collect, use, and disclose sensitive personal information about Applicants as reasonably necessary and proportionate: (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.

5. How We May Disclose Personal Information

Purposes for Disclosing Personal Information

We may disclose the categories of Personal Information we collect for the purposes described above and as follows:

- **Evaluate Candidacy.** When it is necessary to evaluate your requests and where it is necessary to identify Applicants, schedule interviews, and otherwise evaluate your qualifications and eligibility for employment.
- **Compliance and Legal Obligations.** If required to do so by law or if we reasonably believe such action is necessary to comply with the law, judicial proceeding, court order, or the reasonable requests of regulators, law enforcement, or other public authorities.
- **Protection of Us and Others.** To protect the rights, property, or safety of our other workers or our customers, ourselves, or others or where we have a legitimate interest in doing so.
- **Corporate Transactions.** As part of our business transactions.
- **Other Disclosures.** To others and in ways not described above that we notify you of or that we obtain your consent for.

Who We Disclose Personal Information To

We may disclose Personal Information to the following categories of recipients:

- **Affiliates and Subsidiaries.** To our affiliates and subsidiaries.
- **Business Partners.** To business partners where it is necessary to administer the working relationship, conduct our business, or for business operations purposes.
- **Service Providers.** To our service providers who perform services on our behalf.
- **Regulatory and Government Entities.** To comply with our legal obligations and where otherwise required by law, we may disclose the following categories of Personal Information to applicable regulatory and government entities: identifiers; characteristics of protected classifications; professional and employment-related information; education information; usage data; audio, electric, visual, or similar information; inferences; sensitive personal information.
- **Data Analytics Providers.** To undertake internal research, we may disclose the following categories of Personal Information to data analytics providers: identifiers and usage data.
- **Operating Systems and Platforms.** If you sign in to or access Company applications from a personal or CWGS-owned device, we may disclose the following categories of Personal Information to operating systems and platforms, such as Apple iOS, for security and integrity purposes: identifiers and usage data.
- **Social Networks.** To advertise and market to you, we may disclose the following categories of Personal Information to certain social networks: identifiers and usage data.
- **Other Parties With Your Consent.** To a third party such as a bank, mortgage company, lender, credit agency, landlord, or travel agency, but only at your request and with your consent.

6. How We Retain Personal Information

We retain your Personal Information for as long as needed, or permitted, based on the reason we obtained it, subject to applicable law. When deciding how long to keep your Personal Information, we consider whether we are subject to any legal obligations (e.g., any laws that require us to keep records for a certain period of time before we can delete them), whether we have taken any legal positions (e.g., issued any legal holds or otherwise need to preserve the information), or whether there are other business reasons that require us to keep your Personal Information (e.g., workforce planning and system integrity).

7. Security of Personal Information

We use a combination of physical, technical, and administrative safeguards designed to protect the Personal Information we process. While we use these precautions to safeguard your Personal Information, we cannot guarantee the security of the networks, systems, servers, devices, and databases we operate or that are operated on our behalf.

8. Updating Your Personal Information

It is important that the information contained in our records is both accurate and current. We offer various self-help functions within our recruitment platform (such as through ADP) that will allow you to update your Personal Information. If your Personal Information changes during the application process, you can use these self-help tools to update your Personal Information.

9. Your Rights Under the CCPA

The CCPA provides California residents with specific rights regarding Personal Information. This section describes your rights under the CCPA and explains how to exercise those rights. Subject to certain exceptions, California Applicants have the right to make the following requests:

Right to Know/Access. You have the right to request (up to twice per year and subject to certain exemptions), free of charge, that we disclose information about our collection, use, and disclosure of your Personal Information over the past twelve (12) months, including:

- The categories of Personal Information we have collected about you;
- The categories of sources from which the Personal Information is collected;
- Our business or commercial purpose for collecting, selling, or sharing Personal Information;
- For each category of Personal Information, the categories of third parties with whom it was disclosed; and
- A copy of the specific pieces of Personal Information we have collected about you.

Right to Correct. Subject to certain exceptions, you have the right to request that we correct inaccuracies in your Personal Information. Applicants merely seeking to update their information (for example to provide a new mailing address) may do so by using the processes described in the “**Updating Your Personal Information**” section above.

Right to Delete. Subject to certain exceptions, you have the right to request that we delete any Personal Information we have collected from you. After we receive your request and verify your identity, we will review your request to see if an exception requires us to retain the Personal Information. We will delete or de-identify Personal Information not subject to an applicable exception from our records and will direct our service providers to take similar action.

Right to Opt-Out of Sale/Sharing. The CCPA defines “sale” as disclosing or making available Personal Information to a third party for monetary or other valuable consideration, and “sharing” includes disclosing or making available Personal Information to a third party for purposes of cross-contextual behavioral advertising. While we do not disclose Personal Information to third parties in exchange for monetary compensation, we may “sell” or “share” certain identifiers and usage data to third parties (through third-party cookies or pixel tags on our websites). We do so in order to evaluate our advertising campaigns and better reach potential job applicants. The categories of third parties to whom we have “sold” or “shared” Personal Information are data analytics providers, operating systems and platforms, and social networks. We do not sell or share

“sensitive personal information,” nor do we sell or share any Personal Information about individuals who we know are under sixteen (16) years old.

We honor your right to opt out of “sales” and “sharing” as signaled by a universal opt out signal or Global Privacy Control (“**GPC**”). To enable GPC, you can visit the Global Privacy Control page at <https://globalprivacycontrol.org>. If you download a supported browser or extension and exercise your privacy rights with GPC, we will turn off certain third-party cookies on our website after our website detects a GPC signal. If you visit our website from a different device or from a different browser on the same device, you will need to opt-out, or use an opt-out preference signal, for that browser and/or device.

To exercise your right to opt out of “sales” or “sharing,” you can download a supported GPC browser or extension, or you can use the “Do Not Sell or Share My Personal Information” link on the bottom of our Careers website to toggle controls that are available through the privacy preferences page.

Right to Limit Use of Sensitive Personal Information. We do not engage in uses or disclosures of Applicant “sensitive personal information” that would trigger the right to limit use of sensitive personal information under the CCPA.

Right to Non-Discrimination. You have the right to be free from discriminatory adverse treatment for exercising these rights. We will not discriminate against you for exercising your CCPA rights.

Submitting CCPA Requests

Exercising Your Rights

If you are a California resident and would like to exercise your CCPA rights, you may do so by contacting us by phone at the toll-free number, +1 (866) 890-2810 or by visiting <https://www.campingworld.com/hr-dar> and submitting a request.

Verification of Certain Requests

Only you, or an individual legally authorized to act on your behalf, may make a request related to your Personal Information.

Depending on the type of request, we may request information from you in order to verify your identity. Additionally, authorized agents may be required to provide proof of their authorization, and we may also require that you directly verify your identity and the authority of the authorized agent. We cannot respond to your request if we are unable to verify your identity, your authority to make a request on behalf of another person, or if we cannot confirm that the Personal Information relates to you. In general, we will verify your request by asking you to:

- Provide personal identifiers we can match against information we may have collected from you previously and/or
- Confirm your request using the email or telephone number stated in the request.

10. Changes to this Applicant Policy

This Applicant Policy is current as of the Last Updated date set forth above. We may change this Applicant Policy from time to time, so please be sure to check back periodically. We will post any updates to this Applicant Policy here. If we make material changes to how we collect, use, and disclose the Personal Information we have previously collected about you, we will endeavor to provide you with notice. All changes to this Applicant Policy are effective when posted.

11. Contact Us

If you have any questions or concerns about this Applicant Policy, please contact us by using the contact information below:

CWGS Group, LLC
PO Box 6888
Englewood, CO 80155-6888
+1 (866) 890-2810