

# CWGS California Employee Privacy Policy

*Last Updated: January 1, 2023*

This California Employee Privacy Policy (“**Employee Policy**”) describes our Personal Information processing practices with respect to the Personal Information we process about current and former full-time, part-time, and temporary employees and staff of the Camping World and Good Sam family of companies (“**CWGS**,” “**we**,” “**our**,” “**us**,” or the “**Company**”) and who are California residents (each an “**Employee**” or “**you**”). This Employee 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**”).

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## 1. Scope and Relation to Other Policies

This Employee Policy applies to the Personal Information we collect in the employment context about our Employees who are California residents. This Employee Policy supplements additional Company policies and procedures, including but not limited to, our Associate Handbook.

For purposes of this Employee 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 Employee 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 Employee Policy also does not apply to the Personal Information we collect from our customers, contractors, job applicants, or our Employees 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 Employees additional notices about our information practices that are covered by other laws (e.g., background check, drug tests, etc.).

## 2. Personal Information We Collect

The following identifies the categories of Personal Information we collect about Employees (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, and 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 job title, employee ID, office phone number, company cell number, work email, salary and salary history, work performance, disciplinary actions, information related to working hours, absences, training records, annual leave, and retirement.
- **Financial Information.** Such as information related your bank account and other financial account details, payroll records, and tax status information.
- **Health Information.** Such as time on statutory or parental leave and sick leave, information related to testing for controlled substances, vaccination records, records related to administering and maintaining your healthcare and other benefits, and information about a condition needed for pensions and permanent health insurance purposes when you leave employment and the reason for leaving is related to your health.
- **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, and platforms and other information about your use of our computers, devices, and networks, including your Internet use and your email communications using our computers or systems.
- **Audio, Video, and other Electronic Data.** Such as audio, electronic, visual, and similar information, including information collected via call recordings if you are interacting with a customer or member of the public in a customer service capacity, if you call a recorded line, recorded meetings and webinars, videos, photographs, and CCTV footage.
- **Inferences.** Such as inferences drawn from any of the information described in this section reflecting your preferences, characteristics, attitudes, behaviors, and abilities.

- **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:

- **Compliance with Legal Obligations.** Related to our compliance with applicable legal obligations including employment and labor, Social Security and tax, environmental, and other applicable laws, regulations, opinions, and guidance.
- **Onboarding.** To complete necessary onboarding paperwork such as policy acknowledgements.
- **Manage Our Relationship.** To manage our relationship with you, including but not limited to, hiring, payroll, and maintaining records of emergency contact information.
- **Benefits.** To enroll you in and administer eligible benefits, including 401Ks, health insurance, medical plans, and other employee benefits (which may include the collection of Personal Information about others such as beneficiaries, where necessary to administer such benefits).
- **Leaves of Absence.** To manage and respond to requests for vacation time and similar requests.
- **Work-Related Injury Reporting.** To manage and respond to claims if you are injured at work.
- **Security and Monitoring.** For security purposes we monitor our network activity and secure our offices, premises, and assets, including through the use of electronic access systems, and to investigate privacy, security, or workplace-related incidents. Please note that we reserve the right – but do not assume any obligation – to monitor our computer systems. Please see the “**Notice of Monitoring Practices**” section below for more information about our workplace monitoring practices.
- **Business Operations.** For business purposes such as management of our information technology systems and infrastructure, quality control and service level verification, and to otherwise support our business operations.
- **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 employee and other 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 Employees beyond the purposes authorized by the CCPA. Accordingly, we only collect, use, and disclose sensitive personal information about Employees 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:

- **Employment Relationship.** When it is necessary to evaluate your requests and where it is necessary to administer the working relationship.
- **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 or employment-related information; financial information; health information; usage data; audio, video, and other electronic data; inferences; sensitive personal information.
- **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.

- **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. Notice of Monitoring Practices

**TO THE MAXIMUM EXTENT PERMITTED BY LAW, EMPLOYEES HAVE NO REASONABLE EXPECTATION OF PRIVACY WHEN USING COMPANY TECHNOLOGY ASSETS.** Please note that we reserve the right – but do not assume any obligation – to physically and electronically monitor our offices and any use of our IT and communications systems, including all incoming and outgoing email, phone calls, voicemails, website activity, or other information passing through Company technology assets. We may also monitor activity and presence in our offices and site locations (including our dealerships) with CCTV cameras. Our primary purpose for monitoring the workplace is to prevent unauthorized access to our offices and to protect our Employees and property. We may also monitor or record activity on our IT and communications systems and network for security purposes, such as internet traffic, website filtering, email communications, or systems accessed.

## 9. 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 employment tools (such as through ADP) that will allow you to update your Personal Information. If your Personal Information changes during the course of your employment, you can use these self-help tools to update your Personal Information or you may contact Human Resources. In addition, you should keep your information accurate and current with your benefits providers.

## 10. 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 Employees 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. Employees merely seeking to update their information (for example to update your bank information for payroll or 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.** We do not “sell” or “share” Employee Personal Information (as those terms are defined under the CCPA). We do not sell or share “sensitive personal information,” nor do we sell or share the Personal Information of individuals under who we know are under sixteen (16) years old.

**Right to Limit Use of Sensitive Personal Information.** We do not engage in uses or disclosures of Employee “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 filling out a Data Request Form available at <https://www.campingworld.com/hr-dar>. You may also use the various self-help functions within our employment tools (such as through ADP) to access, correct, or delete certain Personal Information, as described in the “**Updating Your Personal Information**” section above.

You can also have an authorized agent make a request at <https://www.campingworld.com/hr-dar>.

### 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;
- Provide your Employee ID; and/or
- Confirm your request using the email or telephone number stated in the request.

**Note, this Employee Policy applies only to rights and practices pursuant to the CCPA.**

These rights are in addition to any rights that may be available to you under the California Labor Code. To the extent you wish to exercise any rights pursuant to the California Labor Code, please contact Human Resources.

## **11. Changes to this Employee Policy**

This Employee Policy is current as of the Last Updated date set forth above. We may change this Employee Policy from time to time, so please be sure to check back periodically. We will post any updates to this Employee 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 Employee Policy are effective when posted.

## **12. Contact Us**

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

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