

California Privacy Rights

This notice to California Residents pursuant to the California Consumer Privacy Act of 2018 ("CCPA") and the California Privacy Rights Act of 2020 effective January 1, 2023 ("CPRA") supplements the information contained in our Website Privacy Policy and corporate Privacy policies, procedures, and standards, and applies solely to employees, independent contractors, visitors, and other individuals who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the CCPA, the CPRA and other California privacy laws. Any terms defined in the CCPA and CPRA have the same meaning when used in this notice.

We do not:

- sell your personal information;
- share or disclose your personal information to third parties other than the entities or service providers discussed below;
- share or disclose your sensitive information to third parties for purposes other than those listed below or otherwise permitted by the CPRA;
- sell or share the personal information of consumers under 18 years of age; or
- permit third parties to collect your personal information on our behalf other than our service providers discussed below.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device ("personal information"). In particular, we have collected the following categories of personal information on consumers as defined under the CPRA within the last twelve (12) months:

Category	Examples	Examples of how Personal Information is used by category, include:
Identifiers (A)	Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.	<ul style="list-style-type: none">• To provide you with information, products, or services that you request from us;• To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection;• Recruitment and retention of employees;• To fulfill any other purpose for which you provide it, including to evaluate applicants' qualifications for employment with the Company;• To evaluate employees' qualifications for promotion within the Company;• To create a talent pool for future job openings;• For recordkeeping purposes;• To demonstrate applicants' or employees' agreement to, or acceptance of, documents presented to them, e.g., acknowledgement of employment application, offer letter, or nondisclosure agreement; and• To evaluate and improve the recruiting process.

<p>Personal Information as defined in the CA Civil Code 1798.80(e) (B)</p>	<p>Your 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>	<p>Same uses as for Category (A) above and to do the following:</p> <p>Financial information: for direct deposit and benefit administration.</p> <p>Photograph and physical description: for security and internal identification purposes.</p> <p>Medical information: (a) for occupational health surveillance; (b) for occupational health and safety compliance and record-keeping; and (c) to respond to an applicant's or employee's medical emergency.</p>
<p>Protected Classification Characteristics under California or Federal law (C)</p>	<p>Age, race, ancestry, national origin, citizenship, religion, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, pregnancy, childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information.</p>	<p>Only as necessary to: (a) identify status to comply with the Family Medical Leave Act and other applicable laws; (b) confirm military and veteran status as necessary to comply with leave requirements under applicable law and for tax purposes; (c) identify national origin and immigration status as necessary to comply with immigration laws; and (d) confirm marital status and familial status as necessary to provide benefits and for tax purposes. <i>The Company collects the aforementioned types of personal information on a purely voluntary basis and uses the information in compliance with applicable laws and regulations.</i></p>
<p>Commercial Information (D)</p>	<p>Records of personal property, products or services purchased, obtained or considered, or other purchasing history or tendencies.</p>	<p>When applicable, to perform a credit check after your acceptance of a conditional offer of employment.</p>
<p>Internet or electronic network activity (F)</p>	<p>Browsing history, search history, and information regarding a consumer's interaction with an internet website application, or advertisement.</p>	<p>The Company may collect information about search history, browsing history, login information, and internet protocol (IP) addresses on the Company's information systems and networks to ensure compliance with Company protocol and protect the Company's systems. The Company may also collect information from publicly available social media, such as LinkedIn, for the purpose of identifying and recruiting candidates, evaluating an applicant's suitability for employment with the Company, or evaluating an employee's qualifications for promotion within the Company.</p>
<p>Sensory Data (H)</p>	<p>Audio, electronic, visual, thermal, olfactory or similar information.</p>	<p>Only as necessary to evaluate an applicant or employee's fitness for duty in accordance with applicable law and regulations.</p>

Professional or employment related information (I)	Current or past job history or performance evaluations	<ul style="list-style-type: none"> • To evaluate applicants' qualifications for employment with the Company; • To evaluate employees' qualifications for promotion within the Company; • To create a talent pool for future job openings; • For recordkeeping purposes; • To demonstrate applicants' or employees' agreement to, or acceptance of, documents presented to them, e.g., acknowledgement of employment application, offer letter, or nondisclosure agreement; and • To evaluate and improve the recruiting process.
Education information, that is not publicly available (J)	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	The Company may collect education information, including, without limitation, academic transcripts, educational discipline records, and academic counseling records, and may use such information to evaluate applicants' qualifications for employment with the Company or an employee's qualifications for promotion within the Company, to conduct a background check (after acceptance of a conditional offer of employment), or to confirm employee's qualification under the tuition reimbursement program.
Inferences drawn from any information identified to create a profile about a consumer and their preferences, trends, etc. (K)		The Company may collect information from references and self-assessments or other questionnaires to determine an applicant or employee's characteristics, attitudes, skills, engagement, initiative and preferences in the context of employment with the Company.

Personal information does not include:

- Publicly available information that is lawfully made available from government records, that a consumer has otherwise made available to the public.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's or CPRA's scope, like:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) and the Driver's Privacy Protection Act of 1994.

Sources of Personal Information

As permitted by law, we may collect personal information about you from the following categories of sources:

- You
- Service providers
- Publicly available information accessible via the Internet and third-party websites (such as LinkedIn), to the extent permitted under applicable local laws
- Educational institutions
- Background check providers and consumer reporting agencies (as legally permitted by law)

General Use of Information

To the extent permitted by applicable law, the Company may use or share any of the foregoing personal information with service providers or other third parties to facilitate administrative functions and internal business operations and for legal reasons and corporate transactions. These functions include, but are not limited to, the following:

- To enforce the Company's legal rights, detect or prevent fraud or security concerns, or protect public safety;
- To satisfy a legal or regulatory requirement, including responding to a lawful government request for information;
- In connection with evaluating or consummating a corporate contract, 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;
- To communicate with applicants and employees;
- To manage an employee's employment relationship with the Company, including for: hiring and onboarding processes; compensation, timekeeping, payroll, and expense report administration; employee benefits administration; employee training and development; the creation, maintenance, and security of online employee accounts; reaching an employee's emergency contacts when needed, such as when an employee is not reachable or is injured or ill; workers' compensation claims management; employee job performance, including goals and performance reviews, promotions, discipline, and termination; and other human resources purposes;
- To manage and monitor employee access to Company facilities, equipment, and systems;
- To conduct internal research, audits and workplace investigations;
- To investigate and enforce compliance with and potential breaches of Company policies and procedures;
- To fulfill or meet the reason for which the information is provided (for example, if an employee provides the Company with bank account information for the purpose of setting up a direct deposit payment option, the Company will use that information to initiate the electronic transfer of the employee's pay directly to the employee's bank account);
- To provide, support, and develop the Company's human resources and personnel functions;
- To create, maintain, and secure personnel files; and
- For other purposes as described herein or to employees or job applicants when collecting their personal information.

Categories of Third Parties to Which We Disclose Personal Information

We may disclose your personal information to the following categories of recipients for our business purposes:

- Service providers
- Data storage providers
- Professional advisors
- Background check providers and consumer reporting agencies (as legally permitted by law)
- Government entities (as required by law)

Your Rights as a California Resident

As a California resident, you have certain rights in relation to your personal information. This section describes those rights and explains how to exercise them.

Right to Know

You have the right to request that we disclose certain information to you about our collection and use of your personal and sensitive information over the last 12 months unless responding to the request is impossible or involves disproportionate effort. Specifically, you have the right to know:

- The categories of personal information and sensitive information we collected about you.
- The categories of sources for the personal and sensitive information we collected about you.
- The business or commercial purpose for collecting, using and/or disclosing that information.
- The categories of third parties, contractors and service providers with whom we share, sell or disclose that personal information.
- The specific pieces of personal information we collected about you.
- If we disclosed your personal information for a business purpose, a list of those disclosures, identifying the personal information categories that each category of recipient obtained.
- Whether your information is sold or shared.
- The retention period or criteria used for retention.

Personal Information Sales Opt-Out and Opt-In Rights

We do not sell your personal information.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Help to ensure security and integrity to the extent the use of the consumer's personal information is reasonably necessary and proportionate for those purposes.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request by either:

- Calling us at 800-325-1453
- Emailing us at privacy@xtra.com

In the case of access and deletion, your request must be verifiable before we can fulfill such request. To protect the security of your personal information, we will require you to verify your identity by providing us with identifying information such as your personal email address, personal telephone number, home address, and/or other information that we can match with the personal information we have already collected about you to verify your identity.

You may use an authorized agent to exercise your right to know, access, delete, or correct your personal information. We will require your authorized agent to provide us with either (1) a power of attorney authorizing the authorized agent to act on your behalf or (2) your written authorization permitting the authorized agent to request access to your personal information on your behalf. We may also require you to either verify your own identity directly with us or directly confirm with us that you provided the authorized agent permission to submit the request.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. Your request must also include sufficient detail for us to properly understand, evaluate, and respond to it. Any disclosures we provide will only cover the 12-month period preceding our receipt of the verifiable request. If we cannot fulfill, or are permitted to decline, your request then we will alert you or your authorized representative.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision. We reserve the right to either refuse to act on your request or charge you a reasonable fee to complete your request if it is excessive, repetitive, or manifestly unfounded.

Data Retention

We retain your personal data only as long as it is needed for business purposes in accordance with legal, regulatory, and contractual requirements and in accordance with our records retention schedules.

Right of Non-Discrimination

You have a right to not receive discriminatory treatment for exercising your access, data portability, and deletion rights described above. Except to the extent permitted by the CCPA, we will not deny you, or charge you different

prices or rates for, goods or services or provide a different level or quality of goods or services for exercising the rights described above.

Contact Information

To ask questions or comment about this privacy policy and our privacy practices, contact us at:

XTRA Lease
7911 Forsyth Boulevard, Suite 600
St. Louis, MO 63105
ATTENTION: Legal Department, privacy@xtra.com