



GREENBRIER APPLICANT PRIVACY POLICY

Introduction

The Greenbrier Companies, Inc. (“Greenbrier” or “We”) respects your privacy and are committed to protecting it through our compliance with this Privacy Policy (this “Policy”) when you provide information to us as part of the employment application process.

This Policy describes the types of information we may collect from you or that you may provide when you apply for an employment opportunity at Greenbrier (your “Application”) on our website’s portal for applications (our “Applicant Portal”) and our practices for collecting, using, maintaining, protecting, and disclosing that information.

This policy applies to information we collect:

- When you provide Greenbrier information as part of your Application.
- In email, text, and other electronic messages between you and Greenbrier regarding your Application.

This Policy does not apply to information collected by us offline or through any other means, including on any other areas of our general website (www.gbrx.com) or any other website operated by Greenbrier or any third party (including our affiliates and subsidiaries). Please see our general Website Privacy Policy (found at <https://www.gbrx.com/legal/>) for our policies and practices regarding information we collect on our websites outside of the Applicant Portal.

Please read this Policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies and practices, your choice is not to submit your Application. By submitting your Application, you agree to this Policy.

Location of Processing; Applicable Law

If you are submitting your Application from outside the United States, please be aware that your information may be transferred to, stored, and processed in the United States where our servers are located and our central database is operated. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country. Accordingly, any personal information you submit with your Application will be collected in the United States and will be subject to its laws. However, if we share your personal information with an affiliate located in another country in its capacity as a potential employer, the affiliate will handle your personal information in accordance with this Policy. Any hiring or other employment-related decisions will be made by the hiring affiliate in accordance with the laws of the

country where the job will be located. Please be assured that we seek to take reasonable steps to ensure that your privacy is protected. By submitting your Application, you understand that your information may be transferred to our facilities and those third parties with whom we share it as described in this Policy.

Children Under the Age of 18

No one under age 18 may submit an Application or any information to Greenbrier. We do not knowingly collect personal information from children under 18. If you are under 18, please do not use or provide any information on Applicant Portal or on or through any of its features, do not register on the Applicant Portal, or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or username you may use. If we learn we have collected or received personal information from a child under 18, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us at careers@gbrx.com.

Information We Collect

We collect several types of information from and about you, including information:

- by which you may be personally identified, such as your name, email address, or any other identifier by which you may be contacted online or offline (“personal information”);
- that is about you but individually does not identify you, and
- about your internet connection, the equipment you use to access your Application, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through your Application. Information collected automatically may include usage details, Internet Protocol (“IP”) addresses, and information collected through cookies, and other tracking technologies (see Automatic Collection).
- From third parties, for example, our business partners.

Information Provided Directly By You

In connection with your Application, Greenbrier will collect the following information:

- name, address, telephone number, email address, and other contact information;
- username and password;
- work authorization status;
- CV, resume, cover letter, previous work experience and education information;

- skills;
- professional and other work-related licenses, permits and certifications held;
- information relating to references;
- employment preferences, willingness to relocate, current salary, desired salary, awards or professional licenses; and
- any other information you elect to provide to us (e.g., employment or professional memberships).

We ask that you avoid submitting the following information that may qualify as sensitive personal information under applicable law, except where such information is legally required: information on religion, nationality or national origin, age, gender identity, sex life or practices or sexual orientation, marital status, genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, background check information, and judicial data such as criminal records or information on other judicial or administrative proceedings.

To the extent the personal information you provide contains details of the information referenced in the preceding paragraph or your job evaluations or educational records, you expressly authorize Greenbrier to handle such details for the purposes of your Application.

Any information you submit must be true, complete, and not misleading. Submitting inaccurate, incomplete, or misleading information may lead to a rejection of your application during the application process or disciplinary action including immediate termination of employment. In addition, it is your responsibility to ensure that information you submit does not violate any third party's rights.

If you provide us with personal information of a reference or any other individual as part of your Application, it is your responsibility to obtain consent from that individual prior to providing the information to us.

Automatic Collection

We may also use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your use of our Applicant Portal, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Applicant Portal.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The information we collect automatically is statistical data and does not include personal information, but we may maintain it or associate it with personal information that we collect in other ways or receive from third parties. This information helps us to improve

our Applicant Portal and application services and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Applicant Portal services according to your individual interests.
- Recognize you when you return to our Applicant Portal.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting, you may be unable to access certain parts of our Applicant Portal. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Applicant Portal.
- **Google Analytics.** We use a tool called “Google Analytics” to collect information about use of our Applicant Portal. Google Analytics collects information such as how often users visit the Applicant Portal, which pages they visit when they do so, and which other sites they used prior to coming to the Applicant Portal. We use the information we get from Google Analytics only to improve our Applicant Portal. Google Analytics collects only the IP address assigned to you on the date you visit the Applicant Portal, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally-identifiable information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit the Applicant Portal, the cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to our Applicant Portal is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You can prevent Google Analytics from recognizing you on return visits to our Applicant Portal by disabling cookies on your browser. For more information on how to opt-out of Google Analytics, see Choices About How We Use and Disclose Your Information.

How We Use Your Information

We collect and process information about you for the following reasons:

- because you voluntarily provide this information;
- because this information is necessary to take steps at your request prior to entering into an employment or internship relationship; or
- to comply with a legal obligation.

The information that you submit with your Application may be used for Greenbrier's personnel recruitment, management, and planning purposes, as permitted by applicable law, including:

- to fulfill or meet the reason you provided the information;
- to process your Application;
- to assess your capabilities and qualifications for a job;
- to conduct reference checks;
- to respond to your inquiries and communicate with you about your Application, and to send you information regarding changes to our terms and policies;
- to comply with or monitor compliance with any applicable law or regulation, including to maintain personnel records and comply with record retention requirements, applicable state and federal labor, employment, tax benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws;
- to provide employees with human resource management services and employee data maintenance and support services;
- to conduct background checks if we offer you a position;
- to prevent unauthorized access to or use of the Greenbrier property, including information systems, electronic devices, network, and data;
- to conduct internal audits and investigate complaints, grievances, and suspected violations of Greenbrier policy;
- to respond to law enforcement requests and as required by applicable law or court order;
- to exercise or defend the legal rights of Greenbrier and its employees, customers, contractors, and agents;
- to design, implement, and promote Greenbrier's diversity and inclusion programs;
- to perform workforce analytics, data analytics, and benchmarking;
- to administer and design health wellness programs;
- to facilitate the efficient and secure use of Greenbrier information systems;
- to improve the safety of employees, customers, and the public regarding use of Greenbrier property and equipment;
- to evaluate an individual's appropriateness for hire, or promotion or transfer to a new position at Greenbrier;
- to engage in human capital analytics, including to identify correlations about individuals and job success, analyze data to improve retention and productivity, and analyze employee preferences to inform human resources policies and procedures; and
- to preserve our other legitimate interests, for example, for Greenbrier's administrative purposes, aggregate management reporting, internal training, and as generally required to conduct our business.

The information about you will be added to Greenbrier's database. If we hire you, personal information we collect in connection with your Application may be incorporated into our human resources system and may become part of your employee file and may be used for other employment-related purposes.

Greenbrier may also use the information as we believe to be necessary or appropriate under applicable law, including laws outside your country of residence to: (a) comply with legal processes; (b) respond to requests from public and government authorities including public and government authorities outside your country of residence; (c) enforce our Terms of Use (found at <https://www.gbrx.com/legal/>) or other agreements; (d) protect our operations; (e) protect our rights, privacy, safety or property, or that of you or others; and/or (f) allow us to pursue available remedies or limit the damages that we may sustain.

If you do not provide sufficient information, we'll be unable to consider your Application.

Disclosure of Your Information

We do not sell personal information. We may disclose aggregated information about our users, and information that does not identify any individual, without restriction.

We will make the information in your Application available to personnel with a business need to know the information, including personnel in the recruiting, human resources and information technology departments, and in the department responsible for the position for which you are applying.

When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract. We may disclose personal information that we collect or you provide as described in this Policy:

- To contractors, service providers, and other third parties we use to support our business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Greenbrier's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Greenbrier about our applicants is among the assets transferred.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.

- To enforce or apply our Terms of Use (found at <https://www.gbrx.com/legal/>) and other agreements.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Greenbrier, our customers, or others.

Choices About How We Use and Disclose Your Information

We strive to provide you with choices regarding the personal information you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Tracking Technologies.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
 - *Google Analytics.* Google has a browser add-on for opting out of Google Analytics which can be found here: <https://tools.google.com/dlpage/gaoptout>.
- **Data Requests.** You may, where permitted by applicable law, request (i) access to personal information we collect, (ii) its modification or suppression, (iii) that we restrict its processing, (iv) that we cease using it (objection right); or (v) that we transfer personal information to you or another organization in a structured, commonly used and machine-readable format (right to data portability). Please use the form on your applicant dashboard to let us know what limitations you would like to create on our use of your personal information. For your protection, we may only implement requests with respect to the information associated with the applicant login used to submit the request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable. Please note that certain personal information may be exempt from such access, correction, or suppression rights pursuant to local data protection laws.

Accessing and Correcting Your Information

You can review and change your personal information by logging into your account in the Applicant Portal and visiting your account profile page. You may also send us an email at info@gbrx.com to request access to, correct, or delete any personal information that you have provided to us. We may not be able to delete your personal information except by also deleting your user account. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

Residents of certain states, such as California, Nevada, Colorado, Connecticut, Virginia, and Utah may have additional personal information rights and choices. Please see Your State Privacy Rights for more information.

Your State Privacy Rights

State consumer privacy laws may provide their residents with additional rights regarding our use of their personal information. If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about your California privacy rights, visit www.gbrx.com/legal to view our Privacy Notice for California residents.

Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether we process their personal information.
- Access and delete certain personal information.
- Data portability.
- Opt-out of personal data processing for targeted advertising and sales.

Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- Correct inaccuracies in their personal information, taking into account the information's nature and processing purpose.
- Opt-out of profiling in furtherance of decisions that produce legal or similarly significant effects.

To exercise any of these rights, or to appeal a decision regarding a consumer rights request, please send us an email at info@gbrx.com.

Nevada also provides its residents with a limited right to opt-out of certain personal information sales. However, please know we do not currently sell data triggering that statute's opt-out requirements.

California Civil Code Section 1798.83 permits California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. However, please know we DO NOT disclose personal information to third parties for their direct marketing purposes.

Current Greenbrier Personnel

If you currently work for Greenbrier or one of our affiliates, you may be eligible to apply for a different position within Greenbrier. If you accept such a position, your benefits programs and Human Resources policies may change. Please consult with your Human Resources manager for the new position concerning application eligibility, benefit programs, and Human Resources policies applicable to that position.

Data Retention

Greenbrier keeps your personal information for as long as required by law or as long as needed or permitted in light of the business purpose for which it was obtained.

We may also retain your information for the purpose of considering whether your skills are suitable for other opportunities. If you do not wish us to do this, please contact careers@gbrx.com. We may remove personal information for inactive accounts from our database, subject to any applicable legal or regulatory obligations. Additionally, Greenbrier may delete personal information about you from our database at any time and without providing any reason. Please retain your own copy of the personal information you provide to us.

Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. All information you provide to us is stored on secure servers behind firewalls and transmitted using SSL encryption technology.

The safety and security of your information also depends on you. Where you have a password for access to certain parts of our Applicant Portal, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to us. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures.

Do not send sensitive information to us via email. It is your sole responsibility to use the appropriate level of care whenever you communicate with us.

Greenbrier hereby disclaims, as far as permitted by local laws, any liability for itself and its affiliates and contractors for any personal information we collect in connection with your Application that is lost, misused, illegally accessed, disclosed, altered, or destroyed.

Changes to This Policy

It is our policy to post any changes we make to this Policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Applicant Portal home page. The date this Policy was last revised is identified at the bottom of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Applicant Portal and this Policy to check for any changes.

Contact Information

To ask questions or comment about this Policy and our privacy practices, or need to access this Policy in an alternative format due to having a disability, please contact us at careers@gbrx.com.

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