

U.S. Privacy Policy – Employees, other Personnel, and Retirees

Effective date: February 13, 2020

Ford is committed to be a trusted steward of the personal information You share with us. This Privacy Policy explains how Ford Motor Company and Ford Motor Credit Company (“Ford”) collect, use and share the personal information of employees, retirees, agents and contractors. In this Privacy Policy, we use the word “You” to refer to anyone within the scope of this Privacy Policy.

CATEGORIES, SOURCES, AND USES OF PERSONAL INFORMATION

The personal information we collect depends on how You interact with us. In the normal course of human resources and business activities, we collect personal information about You from different sources and in various ways. By personal information, we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with You or Your household. Other information directly associated with personal information also may be considered personal information. Information that is aggregated, de-identified, or anonymized is not considered personal information. Publicly available information that is made available from federal, state, or local government records also is not considered personal information.

Categories and Uses of Personal Information

We may collect the following categories of personal information from or about You, or generate about You (whether we collect a specific category of information depends the nature of Your interaction with us):

Category of Personal Information	Examples	Purpose of Use
Contact Information	Contact information such as name, postal address, email, phone, other names (nickname, alias etc.)	Business Operations, such as human resources, emergency contact program, communications
Demographics	Demographic data such as date of birth, gender, race, nationality etc.	Business Operations, such as human resources, reporting, legal compliance
Payment/Expense Data	Requests to reimburse You for personal expenses paid (e.g., meals, mileage) for Ford business	Business Operations, such as human resources, accounting, reporting
Preferences	Information such as preferred language, travel preferences	Business Operations, such as human resources, communications, travel and expense programs
Audio/Visual	Information such as profile pictures, CCTV, meeting and presentation recordings, etc.,	Business Operations, such as human resources, communications
Identification Numbers You Provide to Us	Unique identification numbers such as SSN, Tax ID, Visa/Passport Number, driver’s license or state identification	Business Operations, such as human resources, legal compliance, including compliance with government authority requests

		for information, liens, garnishments and tax compliance
New Hire/Onboarding	Resumes, applications, background checks, IRS Forms W-4 (withholding), etc.	Business Operations, such as human resources, workforce planning, recruitment and staffing
Professional or employment-related information	Current or past job history, education information, performance evaluations.	Business Operations, such as human resources, performance management, learning and development, advancement and succession planning
Biometric, e.g., fingerprint	If You choose to participate in Company biometrics programs, such as the Kensington VeriMark fingerprint reader and Windows Hello for Business (WHFB)	Business Operations, such as providing access to IT systems. See terms of specific program for more information.
Payroll Information	Banking account numbers for direct deposit	Business Operations, such as human resources, payroll and compensation programs
Timekeeping Information	Vacation, sick leave, FMLA, maternity/paternity leave etc.	Business Operations, such as human resources, payroll and compensation, workplace management, travel and expense programs, internal health and safety programs,
Benefits Information	Information used to administer benefits - for example, spouses or dependents of employees; beneficiary information, health information	Business Operations, such as human resources, workforce administration, and benefit programs
Security	Information provided to secure accounts such as passwords	Business Operations, such as human resources, providing access to IT systems
Content of Communications	Information relating to communications sent when using Ford devices or IT systems, e.g., email	Business Operations, such as human resources, legal compliance. See Directive B-104 for more information.
Device Activity	When using Ford devices or IT systems, online activity and usage patterns such as access times, webpages visited, web-logs, app features used, etc.	Business Operations, such as human resources, legal compliance. See Directive B-104 for more information.
Device Details and Network Information; Digital Activity	If You use an personal or Ford device to access Ford IT resources by participating in Ford's mobile programs, including Ford Anywhere, see https://www.digitalworker.ford.com/SitePages/Topic.aspx for additional information	see https://www.digitalworker.ford.com/SitePages/Topic.aspx

Vehicle Location Driving Data Vehicle Data Media Analytics Vehicle Analytics Vehicle Service History	If You operate a Company Vehicle. See Company Vehicle Privacy section below.	See Company Vehicle Privacy section below.
Personnel Contact Information We Generate About You	Personnel ID, such as Global ID or GPID, work email, work address	Business Operations, such as human resources, legal compliance, including compliance with government authority requests for information, liens, garnishments and tax compliance, performance management
Inferred Preferences we Generate about You	We infer new information from other data we collect, including using automated means to generate information about likely preferences or other characteristics.	Business Operations, such as human resources, improving our internal operations

Each of the above categories of information may be used for any or all Business Operations purposes, which includes the operations identified above, and the following: Accounting, finance, tax, regulatory compliance, litigation, information security, fraud detection and prevention, supplier and vendor management, human resources, information technology, and improving our internal operations.

We may combine categories of personal information. We may use de-identified information for any purpose in accordance with applicable law.

Cookies and Similar Technologies

Our online services may use cookies and similar technologies to operate the online service and to help collect data. Cookies are small text files placed on your device to store data that can uniquely identify a device.

Cookies are used to store your preferences and settings, enable you to sign-in, combat fraud, analyze how our sites and applications perform through click-through analysis, and fulfill other legitimate purposes.

We may also utilize electronic images known as web beacons (also called single-pixel gifs) to help deliver cookies on our websites, count users who have visited those websites, and gather usage and performance data. We also include web beacons in our email messages or newsletters to determine whether you open and act on them, and in banners to measure clicks.

Our websites and mobile apps may include web beacons and cookies from third-party service providers, such as analytics providers or third-party content (such as embedded videos, maps, plug-ins, or ads) that contain web beacons used to determine the effectiveness and track your interaction with that content. When a browser connects to a third party's web server to retrieve content and/or web beacons, that third party is able to set or read its own cookies on your device and may collect information about your online activities over time and across different websites or online services that also contain that third party's content or web beacons.

Sources of Personal Information

In relation to employees, some of the personal information that we collect will come from You. On recruitment, it may also come from third parties such as previous employers who provide references, a recruitment agency or background check provider, if used. In relation to agency workers and contractors, personal information will come from You or from Your agency or contractor.

We may also process personal information about You which comes from other sources. Internally, personal information may be obtained or derived from managers, HR and other colleagues or automatically, for example, from our IT systems and company or personal devices connected to our network, access security cards, or CCTV. It may also be derived from external customers or contacts with whom You communicate by email or other systems

We also receive information from others when You direct them to share information with us, and in the following cases:

- Affiliates: We share personal information among the companies within the Ford Motor Company family of companies and affiliates. Our “family of companies” is the group of companies related to us by common control or ownership. We share information within this “family” as a normal part of conducting business and offering products and services to our customers.
- Service Providers and Suppliers: We may receive personal information from our vendors or agents working on our behalf for the purposes described in this Privacy Policy.
- Law enforcement agencies, courts, regulatory agencies, and others: We may receive personal information from government agencies or courts for legal compliance purposes, to protect Your personal safety or the safety of others, to protect Ford’s or others’ rights, or to investigate fraud. We may also receive personal information from others; for example, in connection with litigation settlements, we may acquire information about You from third parties for the purpose of meeting our tax reporting obligations.
- Parties to Corporate Transactions: We may receive personal information as part of a corporate transaction or proceeding such as a merger, financing, acquisition, bankruptcy, dissolution, or at transfer, divestiture, or sale of all or a portion of business or assets.

Occasionally we may legitimately request additional information from You, for example to check if You have the right to work or to process sick pay or family rights (e.g. maternity or paternity leave and pay). If we are not provided with information that we require by law or contract, You may lose benefits or we may decide not to employ You or end Your employment (or if not employed by us, we may decide not to have You work for us or to stop You working for us).

OUR SHARING OF PERSONAL INFORMATION

Our policy is that only those who have a legitimate need to access Your personal information will be able to do so. Personal information may be provided to third parties if this is consistent with our grounds for processing and doing so is lawful.

We share personal information with Your consent, when You direct us to share it with others, or as necessary to complete Your transactions or provide services You have requested or authorized. We also share personal information with:

- Affiliates. We share personal information among the companies within the Ford Motor Company family of companies and affiliates. Our “family of companies” is the group of companies related to us by common control or ownership. We share information within this “family” as a normal part of conducting business and offering products and services to our employees.

- Service providers and suppliers. We share personal information with vendors or agents working on our behalf for the purposes described in this Privacy Policy. In such cases we require these vendors to protect the confidentiality of the personal information and to use it only to provide the services to us. For example, companies we've hired to provide employee service support or assist in protecting and securing our systems and services may need access to personal information to provide those functions.
- Law enforcement agencies, courts or regulatory agencies and others. We will access, transfer, disclose, and preserve personal information when we believe that doing so is necessary to:
 - comply with applicable law or respond to valid legal process, including from law enforcement or other government agencies;
 - detect, investigate, and prevent fraud, or to help prevent the loss of life or serious injury;
 - operate and maintain the security of our products, including to prevent or stop an attack on our computer systems or networks; or
 - protect the rights or property of ourselves or others, including enforcing our agreements, terms, and policies.
- Parties to Corporate Transactions. We may also disclose personal information as part of a corporate transaction or proceeding such as a merger, financing, acquisition, bankruptcy, dissolution, or at transfer, divestiture, or sale of all or a portion of our business or assets.

We may share de-identified information in accordance with applicable law.

CHOICE AND CONTROL OF PERSONAL INFORMATION

Your rights may depend on local law. Ford will be guided by local law in responding to privacy rights requests.

If You wish to see any personal information relating to You, we recommend that You contact Your local HR department in the first instance to see if Your request can be resolved informally. You may also be able to access, edit or delete some of the personal information we have collected by logging into Your HR account and accessing the information displayed in Your profile or account settings. In relation to agency workers and contractors we recommend that You contact Your agency or employing contractor.

SECURITY OF PERSONAL INFORMATION

Safeguarding personal information is important to us. While no systems, applications, or websites are 100% secure, we take reasonable and appropriate steps to help protect personal information from unauthorized access, use, disclosure, alteration, and destruction.

To help us protect personal information, we request that You use a strong password and never share Your password with anyone or use the same password with other sites or accounts.

FORD POLICIES AND DIRECTIVES

This Privacy Policy incorporates by reference Company policies and directives, which are available internally at <https://www.policyportal.ford.com/D2/#d2>, including the following:

Policy Letter No. 23: Privacy and Protection of Personally Identifiable Information

Directive B-104: Confidentiality of Employee Records and Protection of Personally Identifiable Information

SOCIAL SECURITY NUMBER (SSN) PRIVACY POLICY

We use systems, policies, and procedures to protect personally identifiable information, including SSNs, from loss, misuse, or alteration.

Specifically, our policies mandate the following with respect to protecting the confidentiality of sensitive personally identifiable information we have collected, including SSNs:

- Such information should be collected only when necessary to conduct business effectively and its use limited to the stated or reasonably implied purposes for which it was collected. For example, we collect SSNs to support legal and regulatory requirements, to provide products or services to You, and to fulfill our human resources needs.
- Access and/or disclosure of such information must be restricted to employees, agents, and authorized third parties who have a legitimate business need for access. We may disclose such information to other third parties as legally required.
- Such information must be stored and transmitted in a safe and secure manner. To the extent SSN data is collected over the public internet, encryption is required.
- All data containing such information, whether hard copy or electronic, must be destroyed securely in a manner that protects the confidentiality of the underlying data.

Unlawful or improper use or disclosure of SSN information is prohibited. Those who violate this Policy are subject to disciplinary action, up to and including termination.

COMPANY VEHICLE PRIVACY

For individuals who operate company-owned vehicles including individuals participating in Ford's Executive, Lease, and Sales vehicle programs, Ford collects additional personal information as described below:

Category of Personal Information	Examples
Vehicle Location	Location information, including its current location (latitude and longitude) travel direction speed and charging locations used.
Driving Data	Information about how the vehicle is operated and used (such as speed, use of accelerator, brakes, steering, seats, etc.) and the location and environment it is driven in (such as the temperature outside the vehicle and road conditions).
Vehicle Data	Information about the vehicle, its components, and its parts (such as VIN, hardware model, parts numbers, version numbers, technical specifications, etc.), information about the status and performance of the vehicle, its components, and its parts (such as odometer, tire pressure, fuel and fluid levels, batter level, lock status, etc.), and diagnostic information about how the vehicle and its systems are performing (such as trouble codes, warning indicators, and alerts)

Vehicle Service History	Vehicle service-related information such as visit details, service details, service or repair history, etc.
Vehicle Analytics	Information about usage and performance of vehicle features, services, and technology (such as which features are used).
Media Analytics	Information about what is listened to in the vehicle (such as radio presets, volume, channels, media sources, title, artist, and genre)

See the Company Vehicle Privacy Policy <https://www.lifetimeford.com/en-US/MyVehiclePrograms/>, which is incorporated herein by reference, and the terms of Your vehicle agreement where applicable, for additional information regarding our collection, purposes of use, and sharing of this information.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to amend this Privacy Policy at our discretion and at any time. If we make material changes to the Privacy Policy, we will provide notice or obtain consent regarding such changes as may be required by law.

HOW TO CONTACT US

If You have any questions about this Privacy Policy, please contact us through life@ford.com, or call 1-313-206-2706.

Agency and Contractors: we recommend that You contact Your agency or employing contractor.

This Privacy Policy does not form part of Your contract of employment and does not create contractual rights or obligations.