

EMPLOYEE PRIVACY POLICY

Last Modified: June 30, 2023

The Privacy Policy describes how GS Foods Group, Inc. and our subsidiaries and affiliates (“GS Foods”, “we”, “us”, or “our”), collects, stores, uses and discloses personal information about you as a former or current employee in connection with your employment. This notice describes how we use that personal information, to whom we disclose it, how you can exercise your data choices, and how you can contact us.

California Residents: See the California Privacy Rights section below for important information about your personal information and rights under applicable state privacy laws.

Not in scope. This Privacy Policy does not apply to interactions with us outside of the employment context, such as applying to work with us or browsing our website. Please click [here](#) to review our Privacy Notice to learn more about our privacy practices related to those types of interactions.

We may also collect, generate, use and disclose aggregate, anonymous, and other non-identifiable data, which is not personal information subject to this Privacy Policy.

If you have any questions, please contact us as provided below. You may download a copy of this Privacy Policy by clicking [here](#). If you need to receive this Privacy Policy in a different format, please contact us at (888) 671-9626 or HRPrivacy@GSFoodsGroup.com

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Categories of Personal Information We Collect

We collect, and in the preceding 12 months have collected, the below categories of employee personal information with your consent or as otherwise required or permitted by law.

- **Identifiers**, such as your name, address, telephone number, email address, social security number, driver’s license number, military identification number, passport number, tax identification number, signature, I-9 documentation (to show your identity and authorization to work) and emergency contact information.

- **Characteristics of Protected Classifications**, such as your racial, ethnic, or national origin, religion, disability information, marital status, sex, age, sexual orientation, and veteran or military status.
- **Professional or Employment Information**, such as information related to your employment history, including your resume and dates of prior employment, during the application process. Additionally, we collect information from you during your employment with us, such as dates of employment, your work attendance, and records pertaining to your work performance.
- **Biometric information**, such as scans of your fingerprint or handprint, recordings of your voice, and keystroke patterns or rhythms if you use our computer systems.
- **Audio, Visual, or Similar Information**, such as CCTV security camera recordings, and photographs. We may also collect audio messages (such as voicemails) you leave for us, as well as text messages that you send to us during the recruitment process or during our employment with us.
- **Financial Information**, such as your bank account information to process payroll and direct deposits. We may also collect your credit card or debit card information to process expense reimbursements.
- **Health Insurance Information**, such as your policy number and dependent or spouse information.
- **Medical Information**, such as your health, medical and treatment history, and your ability to work, to the extent permitted and required by applicable laws.
- **Internet or other electronic network activity information**, such as your browsing history, search history, cookie data, online identifiers, IP address(es), and information about your interactions with websites or mobile applications, from your device, if you use our networks or our devices.
- **Geolocation data**, such as the location of our vehicles that you may operate.

Sources Of Personal Information

We collect, and in the preceding 12 months have collected, personal information in the following ways:

- **Directly from you.** We may collect personal information directly from you, such as during the job application or onboarding process, during your employment, and/or when you experience a change in your employment status with us.
- **From third parties.** We may collect certain personal information about you from third parties. For example, this includes from vendors that administer leave of absence and retirement benefits. This also includes information from references. Other employees may provide us with information about you, such as performance or evaluation information from a manager or supervisor. We may combine information that we collect from different sources.
- **When you visit our locations.** When you visit our offices or facilities, we also collect identifiers and audio/visual data.

- **Automatically.** When you access our networks or use our electronic devices, we collect your browsing history, search history, cookie data, online identifiers, IP address(es), and information about your interactions with websites or mobile applications. If you operate our vehicles, we collect the geolocation of the vehicle(s).

Purposes for Collecting Personal Information

We use personal information for the following purposes:

- **Onboarding.** We use identifiers, characteristics of protected information, professional or employment information, and education information to complete new hire paperwork, enroll you in our HR system, and set up your personnel file.
- **Background Checks.** After receiving a conditional offer of employment, we may use the identifiers, professional or employment information, and education information we collect to complete a background check to verify your identity, check for criminal history, and confirm the validity of your application to work for us.
- **Benefits.** We use identifiers, financial information, professional or employment information, health insurance information, and medical information we collect to create benefits packages and, if eligible, provide you employee benefits through third-party benefits administrators.
- **Payroll.** We use identifiers, professional or employment information, and financial information to manage and pay you for services provided.
- **Leave and Accommodation Requests.** We use identifiers, professional or employment information, and characteristics of protected classifications we collect to evaluate and process time off, sick leave, leaves of absence, or accommodation requests, if you make such requests.
- **Training, Performance Reviews, and Goals Monitoring.** We use identifiers and professional or employment information we collect to provide you with relevant training, feedback, and to support your career development.
- **Business Operations.** We use identifiers, characteristics of protected classifications, professional or employment information, education information, financial information, health insurance information, medical information, biometric information, audio/visual information, internet or other electronic network activity information, and geolocation information we collect to guide our recruiting and hiring process, maintain files, and support our business operations and the operations of our parent(s), subsidiaries, and affiliates.
- **Security and Crime Prevention.** We use identifiers, biometric information, audio/visual information, internet or other electronic network activity information, and geolocation information to secure our facilities and networks, such as by monitoring access to our network; conducting periodic security checks; and limiting access to our facilities.
- **Legal Compliance and Protection.** We use identifiers, characteristics of protected classifications, professional or employment information, education information, financial information, health insurance information, medical information, biometric information, audio/visual information, internet or other electronic network activity information, and geolocation information we collect to comply with applicable laws, our legal obligations and in our defense of our company, property, and others through legal proceedings.

How We Disclose Personal Information

We disclose personal information in the following circumstances:

- **Service Providers.** We share personal information with vendors and service providers who support the operation of our business, including our background check administrator(s), payroll provider(s), benefits administrator(s), insurance administrator(s), and retirement plan administrator(s). In some cases, the service provider may directly collect the information from you. In the past 12 months, we have disclosed identifiers, professional or employment information, financial information, health insurance information to our service providers.
- **Professional Advisors.** We may share information with professional advisors, such as lawyers, bankers, tax consultants, auditors, and insurers, where necessary in the course of the professional services that they render to us. In the past 12 months, we have disclosed identifiers, characteristics of protected classifications, professional or employment information, and education information to our professional advisors.
- **Government Entities.** We share information with regulatory and government entities including government, administrative, law enforcement and regulatory agencies; tax authorities; and other public agencies or authorities if we think we should in order to comply with any applicable law, regulation, legal process or other legal obligation. This includes cooperating with law enforcement when we think it is appropriate, obtaining legal remedies or limiting our damages, and to enforcing or protecting our contracts, legal rights or the rights of others, including by responding to claims asserted against us. In the past 12 months, we have disclosed identifiers to government entities.
- **Corporate Transaction Recipients.** We may share information with potential investors, purchasers, merger partners, and their advisors in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations; or (iii) are soliciting or accepting investments.
- **Affiliates.** We may share some or all of your personal information with our parent company, subsidiaries, and other companies under common ownership or control with us for purposes consistent with this Privacy Policy.
- **Other Reasons.** We may disclose personal information for other reasons we may describe to you, including if you consent to the disclosure or direct us to disclose your information.

How Long We Keep Personal Information

To the extent permitted by applicable law, we will retain your personal information for as long as reasonably necessary to fulfill the purposes for which it was collected, including to meet any legal, accounting, or other reporting requirements or obligations. We use the following criteria to determine retention periods:

- how long the information is needed to provide our services and operate our business;

- whether there are contractual or legal obligations that exist that require us to retain the information for period of time;
- whether any law, statute, or regulation allows for a specific retention period;
- whether an individual has agreed to a longer retention period;
- whether the data is considered to be sensitive data; and
- what the expectation for retention was at the time the data was provided to us.

Security

We follow generally accepted industry standards to protect the personal information submitted to us and have implemented reasonable technical, organization, administrative and physical measures to protect personal information. No method of transmission or method of electronic storage, is 100% secure, however.

California Privacy Rights

If you are a California resident, this section applies to you.

California Consumer Privacy Act (“CCPA”), as Amended by the California Privacy Rights Act.

Sale or Sharing of Personal Information. In the preceding 12 months, we have not “sold” or “shared” (as those terms are defined in the CCPA) any personal information (including sensitive personal information) to “third parties”, as that term is defined in the CCPA.

Use or Disclosure of Sensitive Personal Information. The following forms of data listed above constitutes “sensitive personal information”: you social security, driver’s license, state identification card, or passport number; your precise geolocation (when in our vehicles); your racial or ethnic origin, and religious beliefs. We do not use or disclose Sensitive Personal Information, as defined by California law, for inferring characteristics or for purposes other than those permitted by law..

Your Rights Under the CCPA. Subject to certain exceptions and limitations, the CCPA affords California consumers the following rights:

- You have the right to request that we tell you (i) what personal information we have collected about you, (ii) the sources of that information, (iii) the purposes for collecting, selling or sharing the personal information; and (iv) the categories of third-parties to whom we have disclosed personal information.
- You have the right to request that we provide you with a copy of your personal information.
- You have the right to request that we delete personal information that we have collected from you. We may not delete all of your personal information if one of the exceptions to the CCPA applies.
- You have the right to correct inaccurate personal information that we hold about you.
- You have the right to not be discriminated against for exercising any of your CCPA rights. We will not discriminate against you if you exercise any of your CCPA rights.

Exercising Your Rights. To exercise any of your rights, please email at HRPrivacy@GSFoodsGroup.com, call us toll free at (888) 671-9626, or use the webform [here](#) on our website to submit a request. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it. You can ask to appeal any denial of your request in the same manner through which you may submit a request.

For all requests, you should provide us with your name, employee ID number, email address, phone number, and mailing address. We will verify your identity by matching the information we have regarding our current and former employees against the information you have provided. Failure to provide the foregoing information may prevent us from processing your request. If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation.

Authorized Agents. Your authorized agent may be able to make a request on your behalf. However, we may need to verify your authorized agent's identity and authority to act on your behalf. We may require a copy of a valid power of attorney given to your authorized agent pursuant to applicable law. If you have not provided your agent with such a power of attorney, we may ask you to take additional steps permitted by law to verify that your request is authorized, such as by providing your agent with written and signed permission to exercise your rights on your behalf, the information we request to verify your identity, and confirmation that you have given the authorized agent permission to submit the request.

Contact Us

If you have questions or concerns regarding this Notice or the handling of your Personal Information, please contact HRPrivacy@GSFoodsGroup.com

At-Will Employment

This Employee Privacy Policy does not form any part of any contract of employment. Your status as a current/former at-will employee with us does not change by virtue of this Employee Privacy Policy.

Updates to Our Privacy Policy

This Employee Privacy Policy may be updated from time to time for any reason. If we make material changes to this Privacy Policy we will notify you by posting the new Privacy Policy [here](#) and changing the effective date listed at the top of this Privacy Policy. If required by law we will also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail or another manner with which we communicate with you as an employee. Any modifications to this Employee Privacy Policy will be effective upon our posting the modified version as described above (or as otherwise indicated at the time of posting).