

California Employee and Job Applicant Privacy Notice

Last Updated: January 1, 2023

Bristol Farms and Lazy Acres Natural Market (together, the “Company,” “we,” “us,” or “our”) provide this California Employee and Job Applicant Privacy Notice (“Privacy Notice”) to describe how the Company collects, uses, stores, and shares your personal information when you apply for a position with, or perform work for the Company.

The following disclosures are made pursuant to the California Consumer Privacy Act, as amended by the California Privacy Rights Act and its implementing regulations (“CCPA”).

This Privacy Notice supplements Bristol Farms and Lazy Acres Natural Market’s other privacy policies. To view Bristol Farms’ Privacy Policy, please visit <https://www.bristolfarms.com/privacy-policy/>. To view Lazy Acres Natural Market’s Privacy Policy, please visit <https://lazyacres.com/privacy-policy/>.

Relevant CCPA Definitions

Term	Definition
Personal information	Information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, to you or your household.
Sensitive personal information	Social security number, driver’s license number, state identification card, passport number, account log-in and password, financial account and password, debit or credit card number and access code, precise geolocation information, race, ethnic origin, religious or philosophical beliefs, union membership, the content of your mail, email or texts other than those communications with us, genetic data, biometric information, health information, and information that concerns your sex life or sexual orientation.
Sell, sale, or sold	Selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or other means, your personal information to a third party for money or other valuable consideration.
Share or shared	Sharing, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by other means, your personal information to a third party for “cross-context behavioral advertising,” whether or not for money or other valuable consideration.

Notice of Collection

Below is a summary of the categories of personal information we have collected from and about you in the twelve months preceding the date that this Privacy Notice was last updated. Also included in this description is information about: (1) why the information is collected and used; (2) whether the information is “sold” or “shared” to third parties; (3) whether the information is disclosed for a business purpose to third parties; (4) whether the information includes “sensitive personal information”; (5) and

a description of how long we may keep your information.

Category: Identifiers (Includes Sensitive Personal Information)

This category includes information such as your name, address, telephone number, unique personal identifier, online identifier, IP address, account log-in, email address, account name, social security number, employee identification number, driver’s license number, passport number, state identification number, signature, or similar identifiers.

Question	Answer
Does this category include sensitive personal information? If so, do we use your sensitive personal information for any purpose outside of what is permitted under the CCPA?	<p>Yes. Personal information that reveals your social security number, driver’s license number, state identification card, passport number, financial account, debit card, or credit card in combination with any required security or access code, password, or credentials, may be considered sensitive personal information.</p> <p>We do not process your sensitive personal information other than for the purposes permitted under the CCPA.</p>
When do we collect this information?	When you apply for a job with the Company, during the onboarding process, to facilitate benefits, or perform other related recruiting and/or employment functions.
Who do we collect this information from?	Directly from you and from our third-party service providers, such as background check/drug testing companies, credit agencies, private investigators, attorneys, or other related parties.
How do we use it?	We use this information for a variety of purposes, including but not limited to: (1) process your application to the Company; (2) run background checks/drug tests; (3) process your onboarding documents; (4) communicate with you about your offer of employment; (5) facilitate various employment functions, such as benefits, claims, leaves of absence, payroll, and other related functions; (6) detect security incidents and protect against malicious or illegal activity; (7) and debug and repair errors in our systems.
Who do we disclose this information to, and why?	To our service providers from time to time to perform certain tasks for the Company, such as providing payroll and benefits services, legal services, and related tasks. We may also share your identifiers with governmental agencies in some cases to facilitate or defend against claims. Finally, we may share this information in the course of a business transaction, such as a merger or acquisition.
Do we “sell” or “share” this information?	No.
How long do we keep it?	We keep this category for so long as is reasonably necessary and proportionate to the original purpose for which we collected the information. We base our criteria in determining appropriate retention

	periods on regulatory and legal requirements, contractual requirements, business needs, and the expectations of our employees/applicants.
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Category: Protected Characteristics (Includes Sensitive Personal Information)

This category includes information such as your race, color, national origin, sex, sexual orientation, gender, gender identity, gender expression, religious creed, mental disability, physical disability, medical condition, military / veteran status, marital status, age, genetic characteristics, ancestry, or reproductive health decision making.

Disclosure	Description
Does this category include sensitive personal information? If so, do we use your sensitive personal information for any purpose outside of what is permitted under the CCPA?	Yes. Sensitive personal information can include information pertaining to your race, ethnicity, religious beliefs, philosophical beliefs, sex, sex life, and health. We do not process your sensitive personal information other than for the purposes permitted under the CCPA.
When do we collect this information from you?	When you apply for a job with the Company, during the onboarding process, to facilitate benefits, or perform other related recruiting and/or employment functions.
Who do we collect this information from?	Directly from you and from our third-party service providers, such as background check/drug testing companies, credit agencies, private investigators, attorneys, or other related parties.
How do we use it?	We use this information for a variety of purposes, including but not limited to: (1) process your application to the Company; (2) run background checks/drug tests; (3) process your onboarding documents; (4) communicate with you about your offer of employment; (5) facilitate various employment functions, such as benefits, claims, leaves of absence, payroll, and other related functions; (6) detect security incidents and protect against malicious or illegal activity; (7) and debug and repair errors in our systems.
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Do we “sell” or “share” this information?	No.
How long do we keep it?	We keep this category for so long as is reasonably necessary and proportionate to the original purpose for which we collected the

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Category: Financial Information (Includes Sensitive Personal Information)

This category includes information such as your bank account number, credit card number, debit card number, or any other financial information along with a required access or security code, password, or credentials that would provide access to the account.

Disclosure	Description
Does this category include sensitive personal information? If so, do we use your sensitive personal information for any purpose other than what is permitted under the CCPA?	Yes. Sensitive personal information can include information that reveals your account log-in with password, and financial or payment account with password. We do not process your sensitive personal information other than for the purposes permitted under the CCPA.
When do we collect this information from you?	When you apply for a job with the Company, during the onboarding process, to facilitate benefits, or perform other related recruiting and/or employment functions.
Who do we collect this information from?	Directly from you and from our third-party service providers, such as background check/drug testing companies, credit agencies, private investigators, attorneys, or other related parties.
How do we use it?	We use this information for a variety of purposes, including but not limited to: (1) process your application to the Company; (2) run background checks/drug tests; (3) process your onboarding documents; (4) communicate with you about your offer of employment; (5) facilitate various employment functions, such as benefits, claims, leaves of absence, payroll, and other related functions; (6) detect security incidents and protect against malicious or illegal activity; (7) and debug and repair errors in our systems.
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Do we "sell" or "share" this information?	No.
How long do we keep it?	We keep this category for so long as is reasonably necessary and proportionate to the original purpose for which we collected the

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Category: Internet or other Electronic Network Activity

Information including your network activity information, browsing history, search history, and information regarding an employee/applicant’s interaction with an Internet Web site, application, or advertisement.

Disclosure	Description
Does this category include sensitive personal information? If so, do we use your sensitive personal information for any purpose other than what is permitted under the CCPA?	No.
When do we collect this information from you?	When you apply for a job with the Company, during the onboarding process, to facilitate benefits, or perform other related recruiting and/or employment functions.
Who do we collect this information from?	Directly from you and from our third-party service providers, such as background check/drug testing companies, credit agencies, private investigators, attorneys, or other related parties.
How do we use it?	We use this information for a variety of purposes, including but not limited to: (1) process your application to the Company; (2) run background checks/drug tests; (3) process your onboarding documents; (4) communicate with you about your offer of employment; (5) facilitate various employment functions, such as benefits, claims, leaves of absence, payroll, and other related functions; (6) detect security incidents and protect against malicious or illegal activity; (7) and debug and repair errors in our systems.
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Do we “sell” or “share” this information?	No.
How long do we keep it?	We keep this category for so long as is reasonably necessary and proportionate to the original purpose for which we collected the information. We base our criteria in determining appropriate

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Category: Biometric Information (Includes Sensitive Personal Information)

Such as fingerprints, handprints, or voice recordings.

Disclosure	Description
Does this category include sensitive personal information? If so, do we use your sensitive personal information for any purpose other than what is permitted under the CCPA?	Yes. Sensitive personal information can include your biometric information. We do not process your sensitive personal information other than for the purposes permitted under the CCPA.
When do we collect this information from you?	When you apply for a job with the Company, during the onboarding process, to facilitate benefits, or perform other related recruiting and/or employment functions.
Who do we collect this information from?	Directly from you and from our third-party service providers, such as background check/drug testing companies, credit agencies, private investigators, attorneys, or other related parties.
How do we use it?	We use this information for a variety of purposes, including but not limited to: (1) process your application to the Company; (2) run background checks/drug tests; (3) process your onboarding documents; (4) communicate with you about your offer of employment; (5) facilitate various employment functions, such as benefits, claims, leaves of absence, payroll, and other related functions; (6) detect security incidents and protect against malicious or illegal activity; (7) and debug and repair errors in our systems.
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Do we "sell" or "share" this information?	No.
How long do we keep it?	We keep this category for so long as is reasonably necessary and proportionate to the original purpose for which we collected the information. We base our criteria in determining appropriate retention periods on regulatory and legal requirements, contractual

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Category: Professional, Education, and Employment Information (Includes Sensitive Personal Information)

Information such as your resume, current or prior job history, performance evaluations, education history, and other information relating to your professional, education, or employment history with the Company or others.

Disclosure	Description
Does this category include sensitive personal information? If so, do we use your sensitive personal information for any purpose other than what is permitted under the CCPA?	Yes. Some employment information may include sensitive personal information. We do not process your sensitive personal information other than for the purposes permitted under the CCPA.
When do we collect this information from you?	When you apply for a job with the Company, during the onboarding process, to facilitate benefits, or perform other related recruiting and/or employment functions.
Who do we collect this information from?	Directly from you and from our third-party service providers, such as background check/drug testing companies, credit agencies, private investigators, attorneys, or other related parties.
How do we use it?	We use this information for a variety of purposes, including but not limited to: (1) process your application to the Company; (2) run background checks/drug tests; (3) process your onboarding documents; (4) communicate with you about your offer of employment; (5) facilitate various employment functions, such as benefits, claims, leaves of absence, payroll, and other related functions; (6) detect security incidents and protect against malicious or illegal activity; (7) and debug and repair errors in our systems.
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Do we “sell” or “share” this information?	No.
How long do we keep it?	We keep this category for so long as is reasonably necessary and proportionate to the original purpose for which we collected the information. We base our criteria in determining appropriate

	retention periods on regulatory and legal requirements, contractual requirements, business needs, and the expectations of our employees/applicants.
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Category: Audio, Electronic, Visual, Thermal Information

Including information such as photographs, video recordings, and recorded messages.

Disclosure	Description
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When do we collect this information from you?	When you apply for a job with the Company, during the onboarding process, to facilitate benefits, or perform other related recruiting and/or employment functions.
Who do we collect this information from?	Directly from you and from our third-party service providers, such as background check/drug testing companies, credit agencies, private investigators, attorneys, or other related parties.
How do we use it?	We use this information for a variety of purposes, including but not limited to: (1) process your application to the Company; (2) run background checks/drug tests; (3) process your onboarding documents; (4) communicate with you about your offer of employment; (5) facilitate various employment functions, such as benefits, claims, leaves of absence, payroll, and other related functions; (6) detect security incidents and protect against malicious or illegal activity; (7) and debug and repair errors in our systems.
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Do we "sell" or "share" this information?	No.
How long do we keep it?	We keep this category for so long as is reasonably necessary and proportionate to the original purpose for which we collected the information. We base our criteria in determining appropriate retention periods on regulatory and legal requirements, contractual

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Notice of Disclosure For A Business Purpose

We may disclose your personal information, including those categories listed above, to our service providers, affiliates, subsidiaries, and other relevant third parties for a variety of business purposes, including to provide you with employment services during your employ at the Company, to facilitate your ability to apply for a job with the Company, and to complete certain elements of your employment with the Company. We may also disclose your personal information other third parties, such as attorneys, service providers, and governmental agencies and courts in the course of regularly providing business. Finally, we may disclose your personal information to third parties during the course of business transactions, such as mergers and acquisitions, or similar business transactions.

Notice of Sale or Sharing

The Company does not sell or share the personal information of California employees and applicants, and it will maintain all personal information under conditions of confidentiality where required by applicable law. We also do not have any actual knowledge of selling or sharing the personal information of any California resident who is 16 years or under.

Notice of Processing Sensitive Personal Information

The Company does not process your sensitive personal information outside of the permissible purposes set forth in the CCPA.

Your Choices

We provide you with the ability to exercise certain controls and choices about how we collect, use, share, and store your information, which are explained further below.

Please note, we may take steps to verify your identity by matching the information you provide with your request with the information we have on file about you. Depending on the sensitivity of the information at issue, we may utilize more stringent verification methods, including but not limited to requiring you to sign a declaration under penalty of perjury.

To submit any of the requests below, or have a request submitted by your representative, please email HR@bristolfarms.com. You may also call us at (310) 233-4700, or reach out to your Human Resources representative directly, via telephone or email.

- **Right of Access.** You have a right to ask that we disclose to you the categories and in some cases specific pieces of information we have collected about you in the 12 months preceding the date of your request, or as otherwise required under applicable law, including information about from where we collected this information and how it has been shared.
- **Right to Delete.** You have a right to ask that we delete your information, subject to appropriate legal exceptions such as, but not limited to, if the information is necessary to complete your application, continue your employment, or continue your contract.
- **Right to Correct Information.** You have a right to ask that we correct your personal information, subject to certain exceptions and limitations.

- **Non-Discrimination.** We will not discriminate against you in any way if you exercise your rights under this Privacy Notice.

Accessibility

If you have a disability, you may access this Privacy Notice and other notices in an alternative format by contacting us at HR@bristolfarms.com or via telephone at (310) 233-4700.

Changes

We may change this Privacy Notice from time to time. Changes to this Privacy Notice will be provided in person or by email or another electronic method, as appropriate under applicable law. The last updated date will be stated at the top of this Privacy Notice.

Contact

If you have any questions about this Privacy Notice, please contact Human Resources at HR@bristolfarms.com or via telephone at (310) 233-4700.