

The Bumble Bee Seafood Company Policy, Process and Procedures



Team Member and Applicant Privacy Notice

Human Resources Department

This Notice became effective on May 3, 2023. We update this Notice every year.

DEFINITIONS

For purposes of this Notice, the following definitions apply:

Personal Information

“Personal Information” is information that identifies, relates to, describes, is associated with, or could be linked to a particular person.

Sensitive Personal Information

“Sensitive Personal Information” is “Personal Information” that includes a person’s:

- Government identification
- Finances
- Race
- Communications (unless the company is the intended recipient)
- Biometrics
- Health

WHAT SPECIFIC CATEGORIES OF *PERSONAL INFORMATION* DO WE COLLECT FROM TEAM MEMBERS AND APPLICANTS FOR EMPLOYMENT?

We collect the following categories of “Personal Information” from team members and applicants for employment:

- Name
- Address
- Date of birth
- Employment history
- Education
- Telephone numbers
- Photographic image
- Gender
- Veteran status

WHAT *SENSITIVE PERSONAL INFORMATION* DO WE COLLECT FROM TEAM MEMBERS AND APPLICANTS FOR EMPLOYMENT?

We collect the following categories of “Sensitive Personal Information” from team members and applicants for employment:

- Social Security number
- Passport numbers
- Driver's license information
- Banking information
- Biometric – voice and fingerprint
- Medical information
- Email messages
- Audio messages

- Race
- Relating to Covid 19, for team members only:
 - Whether or not team members have been vaccinated against Covid 19, including proof of vaccination for those who have been vaccinated
 - Whether the Covid 19 vaccine is medically contraindicated for particular team members, or medical necessity requires a delay in vaccination
 - Whether particular team members cannot be vaccinated for Covid 19 and/or wear a face covering as required by policy because of a disability or due to a sincerely held religious belief, practice, or observance
 - Whether team members test positive for Covid 19
 - If tested for Covid 19, the type or types of tests taken
 - If team members had a Covid 19 infection or positive Covid 19 test requiring a medical removal from the workplace
 - Results of a Covid 19 test allowing team members to return to work
 - Whether team members have been diagnosed with Covid 19 by a licensed healthcare provider
 - If team members have severe COVID-19 or an immune disease, the guidance provided by a licensed healthcare provider regarding return to work

WHAT ARE THE SOURCES OF THE SPECIFIC CATEGORIES OF *PERSONAL INFORMATION* AND *SENSITIVE PERSONAL INFORMATION* THAT WE COLLECT FROM TEAM MEMBERS AND APPLICANTS FOR EMPLOYMENT?

We obtain information from team members and applicants for employment through email, regular mail, telephone contacts, and in-person interviews.

FOR WHAT SPECIFIC PURPOSES DO WE COLLECT *PERSONAL INFORMATION* AND *SENSITIVE PERSONAL INFORMATION* FROM TEAM MEMBERS AND APPLICANTS FOR EMPLOYMENT?

We use this Personal Information, Sensitive Personal Information, or both:

- To determine an applicant's eligibility for employment.
- To administer internal functions – including pay, benefits, time and attendance, workers' compensation, and access to protected space.

- To comply with legal requirements governing corporate minutes, corporate resolutions, and shareholder information.
- For race and gender voluntarily submitted by team members and applicants for employment, to comply with Title VII of the Civil Rights Act of 1964, the federal equal employment opportunity law which makes it illegal to discriminate against a person on the basis of a legally protected class – for example, race, color, religion, gender, and national origin.
- For veteran status voluntarily submitted from team members and applicants for employment, to comply with the Vietnam Era Veterans Readjustment Assistance Act.
- For team member email information over the Company email system, to further any lawful purpose – including business conduct or human resources inquiries, ensuring that use of the system is authorized, and operational security.
- For team members only relating to Covid 19 vaccination status and Covid 19 testing, to comply with the Bumble Bee Seafoods Mandatory Covid 19 Vaccination Policy.

SUMMARY OF INFORMATION COLLECTED, SOURCES, AND PURPOSE OF COLLECTION

Information Collected	Personal or Sensitive	Purpose of Collection
Name	Personal	Administer internal functions
Address	Personal	Administer internal functions
Date of birth	Personal	Administer internal functions
Employment history	Personal	Determine eligibility for employment
Education	Personal	Determine eligibility for employment
Telephone number	Personal	Administer internal functions
Photographic image	Personal	Administer internal functions
Gender	Personal	Comply with Title VII of the Civil Rights Act of 1964
Veteran status	Personal	Comply with Vietnam Era Veterans Readjustment Assistance Act
Social Security number	Sensitive	Administer internal functions
Passport numbers	Sensitive	Administer internal functions
Driver’s license information	Sensitive	Administer internal functions
Banking information	Sensitive	Administer internal functions
Biometric – fingerprint	Sensitive	Administer internal functions; determine access to space
Biometric – voice	Sensitive	Administer internal functions
Medical information	Sensitive	Administer internal functions
Email messages	Sensitive	Administer internal functions
Audio messages	Sensitive	Administer internal functions
Race	Sensitive	Comply with Title VII of the Civil Rights Act of 1964

TO WHOM DO WE DISCLOSE PERSONAL INFORMATION FROM TEAM MEMBERS AND APPLICANTS FOR EMPLOYMENT?

We disclose Personal Information from team members to regulatory agencies – including the California Department of Industrial Relations, Division of Workers’ Compensation, and California Department of Labor, Employment Development Department.

When necessary, we disclose Personal Information from team members to our workers’ compensation insurance carriers, and our outside counsel who represents us in employment-related matters.

We disclose Personal Information to third parties who conduct background reviews on prospective team members.

We disclose Personal Information and Sensitive Personal Information collected from team members to select business partners for routine human resources functions:

- The Company sponsored employee health insurer (Anthem)
- The financial firm that administers employee 401k investment plans (Fidelity)
- The Company payroll system (Paylocity)
- The Company time and attendance recording system (Novatime)
- The Company performance management system (PerformYard – beginning 2023)

We do not sell or share applicant or team member Personal Information or Sensitive Personal Information for any other purpose – including for behavioral advertisements.

HOW LONG DO WE KEEP PERSONAL INFORMATION?

We retain Personal Information in accordance with our Records Management Policy. That policy states that depending on the type of information collected, the information will be deleted from our records after a pre-determined amount of time.

ARE EMPLOYEE USE OF, AND COMMUNICATIONS ON COMPANY SYSTEMS AND DEVICES PRIVATE?

Any information sent or received using the Company’s resources – including the Company computer system, email system, or intranet – is the property of the Company. Team members have no expectation of privacy in the use of Company computers or emails.

The Company may monitor team member communications and team member use of the Internet for any lawful purpose – including detection of misconduct, access to inappropriate websites, or other misuse of the Company’s computer network.