

The Bumble Bee Seafood Company Policy, Process and Procedures



Team Member and Applicant Privacy Notice of Collection

Compliance Department

INTRODUCTION

This Notice is made available to all Team Members and applicants for employment.

We update this Notice every year. This version became effective on August 1, 2023.

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 may 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 may 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

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 employment history and education to determine an applicant’s eligibility for employment.

We use information from team members to administer internal functions – including pay, benefits, time and attendance, workers’ compensation, and access to protected space.

We use information relating to race and gender voluntarily submitted to us from 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 based on a legally protected class – for example, race, color, religion, gender, and national origin.

We use information relating to veteran status voluntarily submitted to us from team members and applicants for employment to comply with the Vietnam Era Veterans Readjustment Assistance Act.

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

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 may disclose Personal Information and Sensitive 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 and Sensitive 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 investigations and drug screenings 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 travel and expense reporting system (SAP Concur and Gant)
- The Company performance management system (PerformYard – beginning 2023)
- The firm that compiles information about the Company affirmative action plan (FP Consulting, LLC)

HOW LONG DO WE KEEP PERSONAL INFORMATION?

We retain Personal Information and Sensitive Personal Information in accordance with legal and policy requirements in line with our record retention schedule. We only collect, process, and retain the

minimum necessary personal information that is required for the purposes for which it was collected. In general, we retain personnel files – including hirings and terminations, relocation expenses, and training and development programs – for eight years.

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.