

  <b>POLICIES &amp; PROCEDURES</b>	Number: GV.0000.030.0204	
	Effective Date:  January 1, 2020	
	Supersedes:  N/A	
	<b>Gate Gourmet, Inc. California Employee Privacy Policy</b>	
Carol Chan	Title: Interim General Counsel, North America	Page 1 of 4

**PURPOSE AND SCOPE**

This **Privacy Policy for California Employees (“Employee Policy”)** applies solely to all individuals that reside in the State of California who are job applicants, employees, directors, officers, or contractors (“**Workers**”) of Gate Gourmet, Inc. and its applicable affiliates (“**Gate**”). Gate has a different privacy notice for California residents who are not Workers. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“**CCPA**”) and any terms defined in the CCPA have the same meaning when used in this notice.

**POLICY**

**Information We Collect**

We may collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Worker or device (“**Personal Information**”). In particular, we may have collected the following categories of Personal Information from those Workers who are subject to this privacy notice within the last twelve (12) months:

<b>Categories of Personal Information as defined by Section 1798.140(o)(1) which are collected</b>
A. Identifiers and demographic data.
B. and C. Protected classification characteristics under California or federal law.
E. Biometric information.
F. Internet or other similar network activity.
G. Geolocation data.

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H. Sensory data.
I. Professional or employment-related information, including but not limited to Personal Information related to individuals who receive benefits from Gate as a result of your status as a Worker with Gate.
J. Non-public education information.
K. Inferences drawn from other Personal Information.

Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated information.
- Information excluded from the CCPA's scope

Gate obtains the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions as a Worker, from records of your use of Gate information technology, or from location-tracking enabled devices connected to Gate assets you may use as part of your regular employment related activities with Gate.
- From independent third parties related to your eligibility for employment, or our ongoing management of our business.
- Other Workers, as part of Gate's management, evaluation, training, and discipline processes.
- Information Technology use logs.

**Use of Personal Information**

We may process or disclose the Personal Information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to apply for a job at Gate, or, request vacation time, or, in order to administer benefits, or to process payroll.
- To provide, support, personalize, and develop our Worker population.

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- To provide you with support and to respond to your inquiries.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Information.
- Disclosures made in an effort to prevent or halt violations of Gate policies, illegal activities, or as required by law.
- Disclosures that we reasonably believe are necessary to defend against or prevent us from incurring liability to third parties.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

### **Sharing Personal Information**

Gate is part of an international group of companies where certain services are provided centralized by one or more affiliates for the entire group or a part of it. We, therefore, reserve the right to share personal information with our direct and indirect affiliates for all purposes described above. Whenever we share Personal Data with affiliates, we request from them that they commit themselves to process Personal Data in line with this Privacy Notice only.

We may disclose your Personal Information to a third party for a business purpose. When we disclose Personal Information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that Personal Information confidential and not use it for any purpose except performing the contract. These third parties are “Service Providers” as defined by applicable law. We do not share Personal Information with any third parties, who are not Service Providers, where Gate may receive a financial benefit from such sharing.

We may also disclose your Personal Information to another company as part of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets to that company; or where required by Gate policy, law, or in response to valid legal process compelling disclosure.

### ***Disclosures of Personal Information***

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In the preceding twelve (12) months, Gate has disclosed all of the categories of Personal Information as noted above, for the business purposes described above

We disclose your Personal Information for a business purpose only to Service Providers, or, where required by law, or in response to valid legal process compelling disclosure.

***Sales of Personal Information***

In the preceding twelve (12) months, Company has not sold Personal Information. The Company does not and will not sell Personal Information of Workers.

**Changes to Our Privacy Notice**

Gate reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date.

**Contact Information**

If you have any questions or comments about this notice, the ways in which Gate collects and uses your information, please do not hesitate to contact either your HR representative or the Gate Legal Department.

**Last Reviewed on:** December 31, 2019.