



BUMBLE BEE SEAFOODS PRIVACY POLICY FOR EMPLOYEES AND APPLICANTS FOR EMPLOYMENT

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INTRODUCTION

This *Policy* applies to information relating to Bumble Bee Foods, LLC (“Bumble Bee”) employees and applicants for employment.

For the benefit of consumers, the Company also has a public-facing Privacy Policy. Employees and applicants for employment are referred to that policy for consumer-oriented questions regarding privacy, including the California Consumer Privacy Act. That Policy is found on the Compliance page of the Fishbowl, or through <https://www.bumblebee.com>.

We update this policy every year. This Policy became effective on **February 4, 2022**.

WHAT IS “PERSONAL INFORMATION”?

This *Policy* applies to all Personal Information of Bumble Bee Foods, LLC (“Bumble Bee”) employees and applicants for employment collected, processed, or stored by Bumble Bee. Any information that is personally identifiable – including, but not limited to, your name, address, zip code, email address, IP address, telephone numbers, birth date, and security question answers – is considered Personal Information.

WHAT SPECIFIC CATEGORIES OF PERSONAL INFORMATION DO WE COLLECT FROM EMPLOYEES AND APPLICANTS FOR EMPLOYMENT?

We collect the following categories of information from employees and applicants for employment:

- Name
- Address
- Social Security Number
- Date of birth
- Employment history
- Education
- Telephone numbers
- Passport numbers
- Driver's license information
- Banking information
- Biometric – voice and fingerprint
- Photographic image
- Medical information
- Audio messages
- Race
- Gender
- Veteran status
- Information contained in email communications over the Company email system.
- Relating to Covid 19, for employees only:
 - Whether or not employees 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 employees, or medical necessity requires a delay in vaccination.

- Whether particular employees 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 employees test positive for Covid 19.
- If tested for Covid 19, the type or types of tests taken.
- If employees had a Covid 19 infection or positive Covid 19 test requiring a medical removal from the workplace.
- Results of a Covid 19 test allowing employees to return to work.
- Whether employees have been diagnosed with Covid 19 by a licensed healthcare provider.
- If employees 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 THAT WE COLLECT FROM EMPLOYEES AND APPLICANTS FOR EMPLOYMENT?

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

Email communications over the Company email.

FOR WHAT SPECIFIC PURPOSES DO WE COLLECT PERSONAL INFORMATION FROM EMPLOYEES AND APPLICANTS FOR EMPLOYMENT?

We use some of this information to determine an applicant’s eligibility for employment.

We use information from employees to administer internal functions – including without limitation 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 employees 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.

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

We use employee email information over the Company email system for any lawful purpose – including business conduct or human resources inquiries, ensuring that use of the system is authorized, and operational security.

For employees only, we use information relating to Covid 19 vaccination status and Covid 19 testing to comply with the *Bumble Bee Seafoods Mandatory Covid 19 Vaccination Policy*.

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

We disclose Personal Information from employees 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 employees to our workers’ compensation insurance carriers, and our outside counsel who represent us in employment-related matters.

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

We disclose Personal Information from employees to company sponsored employee health insurers, and the financial firms that administer employee 401k investment plans.

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.

DO WE SELL PERSONAL INFORMATION?

Bumble Bee does not sell any personal information we collect.

HOW DO WE SAFEGUARD INFORMATION?

We have in place procedural, technical, and administrative measures to safeguard the information we collect and use.

As a matter of policy, we do not disclose details regarding our security measures because they could be used by those who intend harm, or violate the law.

While Bumble Bee takes every reasonable step to securely maintain all information, no safeguards or standards are guaranteed to provide 100% security. We encourage you to use appropriate self-protection measures and practice safe browsing on all websites.

Finally, some who intend harm attempt to use our brand to create fake websites, send fake texts or emails, and conduct other activities to commit fraud or attempt to breach consumers' security. If you receive anything with the Bumble Bee brand that seems suspicious, please contact our Information Technology Department.

WHO CAN YOU CONTACT WITH QUESTIONS?

You may contact the Legal Department or Chief Compliance Officer with questions or concerns