

Sacramento Natural Foods Co-op Human Resources Privacy Notice

Revised December 2022 and effective January 2023

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INTRODUCTION

Sacramento Natural Foods Co-op and its subsidiaries: Blue Heron Farms (collectively, “CO-OP”) is providing this CO-OP’s Human Resources Privacy Notice (“HR Privacy Notice”) to provide information to its employees, job applicants, temporary employees, and contractors (collectively “Personnel”) – and other individuals whose Personal Data is collected for human resources purposes (such as qualified dependents) – regarding how we collect and use your Personal Data in connection with your employment and other relationship with the CO-OP. In this Notice, “Personal Data” means data relating to identified or identifiable individuals and households.

SCOPE OF THIS POLICY

This HR Privacy Notice applies only to Personal Data processed in the 12-months preceding the effective date in the context of CO-OP’s human resources (“HR”), employment, and other internal business functions relating to our Personnel and their family members or beneficiaries, including internal computer systems, networks, online services, benefits, etc.

CO-OP’s Consumer Privacy Notice (“Consumer Privacy Notice”) describes how we collect, use and protect the Personal Data of individuals who use the CO-OP website (<https://sac.coop/privacy-policy>) and other online services. The Privacy Notice will apply to the extent CO-OP Personnel use any products or services subject to the Consumer Privacy Notice.

HOW TO CONTACT US

Sacramento Natural Foods Co-op
2820 R St.
Sacramento, CA 95816
hr-group@sac.coop
916-732-3142

See below for information relating to how to submit requests to exercise your rights in the Personal Data we process.

CATEGORIES OF PERSONAL DATA

This chart describes the categories of Personal Data that the CO-OP may collect in connection with its employment and contractual work relationships. Note, all Personal Data may be used and disclosed in connection with our Business Purposes.

Category of Personal Data & Representative Data Elements	Common Purposes for Collecting & Sharing
Contact Data	We use your Contact Data to communicate with you by mail, email, telephone, or text about your employment,

Category of Personal Data & Representative Data Elements	Common Purposes for Collecting & Sharing
<ul style="list-style-type: none"> • Honorifics and titles, preferred form of address • Mailing address • Email address • Telephone number • Mobile number 	<p>including sending your work schedule information, compensation and benefits communications, and other company information and communications.</p> <p>Contact Data is also used to help us identify you and personalize our communications, such as by using your preferred name.</p>
<p>Identity Data</p> <ul style="list-style-type: none"> • Full name, nicknames or previous names (such as maiden names) • Date of birth • Language • Employee ID number • Company account identifiers and passwords • Benefits program identifiers • Biometric identifiers • System identifiers (e.g., usernames or online credentials) 	<p>We use your Identity Data to identify you in our HR records and systems, to communicate with you (often using your Contact Data) and to facilitate our relationship with you, to facilitate obligations to unions (including under applicable collective bargaining agreements), for internal record-keeping and reporting (including for data matching and analytics), cash register access and time clock usage, and to track your use of company programs and assets, and for most processing purposes described in this HR Privacy Notice, including governmental reporting, employment/immigration verification, background checks, etc.</p>
<p>Government ID Data</p> <ul style="list-style-type: none"> • Social security/national insurance number • Driver's license information • Passport information • Other government-issued identifiers as may be needed for risk management or compliance (<i>e.g., if you are a licensed professional, we will collect your license number</i>) 	<p>We use your Government ID Data to identify you and to maintain the integrity of our HR records, enable employment verification and background screening, such as reference checks, license verifications, and criminal records checks (subject to applicable law), enable us to administer payroll and benefits programs and comply with applicable laws (such as reporting compensation to government agencies as required by law), as well as for security and risk management (such as collecting driver's license data for employees who operate company vehicles, professional license verification, fraud prevention and similar purposes).</p> <p>We may also use Government ID data for other customer business purposes, such as collecting passport data and secure flight information for employees and contractors who travel as part of their job duties.</p>
<p>Biographical Data</p>	<p>We use Biographical Data to help us understand our employees and contractors and for professional and</p>

Category of Personal Data & Representative Data Elements	Common Purposes for Collecting & Sharing
<ul style="list-style-type: none"> • Resume or CV • Application and screening questionnaires • Data from information publicly available on the Internet • Education and degree information • Employment or other work history • Professional licenses, certifications, and memberships and affiliations • Personal and professional skills and talents summaries (e.g., languages spoken, CPR certification status, community service participation), interests and hobbies • Professional goals and interests • Criminal records 	<p>personal development, to assess suitability for job roles, and to ensure a good fit between each individual's background and relevant job functions.</p> <p>We also use Biographical Data to foster a creative, diverse workforce, for recruiting, for coaching, and to guide our decisions about internal programs and service offerings.</p>
<p>Transaction and Interaction Data</p> <ul style="list-style-type: none"> • Dates of Employment • Re-employment eligibility • Position, Title, Reporting Information • Work history information • Time and attendance records • Leave and absence records • Salary/Payroll records • Benefit plan records • Housing records • Travel and expense records • Training plan records • Performance records and reviews • Disciplinary records 	<p>We use Transaction and Interaction Data as needed to manage the employment relationship and fulfill standard HR functions, such as scheduling work, providing payroll and benefits and managing the workplace (e.g., onboarding, maintenance, evaluations, performance management, investigations, etc.).</p>
<p>Financial Data</p> <ul style="list-style-type: none"> • Bank account number and details • Company-issued payment card information, including transaction records • Tax-related information 	<p>We use your Financial Data to facilitate compensation, (such as for direct deposits), expense reimbursement, to process financial transactions, for tax withholding purposes, and for security and fraud prevention.</p>

Category of Personal Data & Representative Data Elements	Common Purposes for Collecting & Sharing
<p>Health Data</p> <ul style="list-style-type: none"> • Medical information for accommodation of disabilities • Medical information for leave and absence management, and emergency preparedness programs • COVID-19 testing and vaccination data and exposure to COVID-19 • Vaccination status • Wellness program participation • Information pertaining to enrollment and utilization of health and disability insurance programs 	<p>We use your Health Data as needed to provide health and wellness programs, including health insurance programs, and for internal risk management and analytics related to our HR functions, staffing needs, and other Business Purposes.</p> <p>In response to the COVID-19 pandemic, we have implemented health and other screening procedures, vaccination tracking, and other measures to reduce the possibility of transmission to our Personnel and guests and to comply with applicable public health orders and guidance. We use and may need to share this data to carry out contact tracing, implement and enforce workplace safety rules, and for public safety reasons and compliance obligations.</p>
<p>Device/Network Data</p> <ul style="list-style-type: none"> • Device information from devices that connect to our networks • System logs, including access logs and records of access attempts • Records from access control devices, such as badge readers • Information regarding use of IT systems and Internet search and browsing history, metadata and other technically-generated data • Records from technology monitoring programs, including suspicious activity alerts • Data relating to the use of communications systems and the content of those communications 	<p>We use Device/Network Data for system operation and administration, technology and asset management, information security incident detection, assessment, and mitigation and other cybersecurity purposes. We may also use this information to evaluate compliance with company policies. For example, we may use access logs to verify work hours and attendance records. Our service providers may use this information to operate systems and services on our behalf, and in connection with service analysis, improvement, or other similar purposes related to our business and HR functions.</p>
<p>Audio/Visual Data</p> <ul style="list-style-type: none"> • Photographs • Video images, videoconference records • Call center recordings and call monitoring records 	<p>We may use Audio/Visual Data for general relationship purposes, such as call recordings used for training, coaching, or quality control.</p>

Category of Personal Data & Representative Data Elements	Common Purposes for Collecting & Sharing
<ul style="list-style-type: none"> • Voicemails 	
Inference Data <ul style="list-style-type: none"> • Performance reviews • Results of tests related to interests and aptitudes 	<p>We use Inference Data to help tailor professional development programs and to determine suitability for advancement or other positions. We may also analyze and aggregate data for workforce planning. Certain Inference Data may be collected in connection with information security functions (e.g., patterns of usage and cybersecurity risk).</p>
Compliance and Demographic data <ul style="list-style-type: none"> • Employment eligibility verification records, background screening records, and other records maintained to demonstrate compliance with applicable laws, such as payroll tax laws, ADA, FMLA, ERISA, etc. • Occupational safety records and workers' compensation program records • Records relating to internal investigations • Records of privacy and security incidents involving HR records, including any security breach notifications 	<p>We use Compliance and Demographic Data for internal governance, corporate ethics programs, institutional risk management, reporting, demonstrating compliance and accountability externally, and as needed for litigation and defense of claims.</p>
Protected Category Data Characteristics of protected classifications under state or federal law, e.g. race, national origin, religion, gender, disability, marital status, sexual orientation, or gender identity	<p>We use Protected Category Data as needed to facilitate the employment relationship or other relationship, for compliance and legal reporting obligations, to evaluate the diversity of our Personnel and the success of our diversity and inclusion efforts, and as needed for litigation and defense of claims.</p>
Sensitive Personal Data The following categories of data we collect are considered "Sensitive Personal Data:" <ul style="list-style-type: none"> • Protected Category Data; 	<p>We use Sensitive Personal Data only as strictly necessary for the purpose it is collected with your knowledge and consent if required by law (e.g. health information on a health insurance benefits application, COVID-19 vaccination status for staffing or entry into locations</p>

Category of Personal Data & Representative Data Elements	Common Purposes for Collecting & Sharing
<ul style="list-style-type: none"> • Health Data • Government ID • any other Personal Data revealing: <ul style="list-style-type: none"> (i) Social security, driver's license, state identification card, or passport number; (ii) account log-in and password, financial account, debit card, or credit card number; (iii) racial or ethnic origin, religious or philosophical beliefs, or union membership; (iv) mail, email, and text message content (unless we are the intended recipient); and (v) (1) biometric data for the purpose of uniquely identifying a natural person; (2) data concerning health. 	<p>where vaccination is required, and requests for accommodation).</p>

SOURCES OF PERSONAL DATA

We collect Personal Data from various sources, which vary depending on the context in which we process that Personal Data.

- **Data you provide us** – We will receive your Personal Data when you provide them to us, when you apply for a job, complete forms, via the CO-OP employee portal (Paycom), provide information via the employee self-service app, allow us to perform a health-related test or otherwise direct information to us.
- **Data from a third party** – We will receive your Personal Data from third parties such as recruiters, credit reporting agencies, or employment screening providers.
- **Data from publicly available sources** – We may collect data that is publicly available on the Internet (e.g. through a Google search of a candidate's name).
- **Data we collect automatically** – We may also collect information about or generated by any device you have used to access internal IT services, applications, and networks.
- **Data we receive from Service Providers** – We receive information from service providers performing services on our behalf.
- **Data we create or infer** – We (or third parties operating on our behalf) create and infer Personal Data such as Inference Data based on our observations or analysis of other Personal Data processed under this Privacy Notice, and we may correlate this data with

other data we process about you. We may combine Personal Data about you that we receive from you and from third parties.

DISCLOSURE OF PERSONAL DATA

We generally process HR Personal Data internally; however, it may be shared or processed externally by third party service providers, when required by law or necessary to complete a transaction, or in other circumstances described below.

CATEGORIES OF INTERNAL RECIPIENTS

The Personal Data identified below collected from our Personnel may be disclosed to the following categories of recipients in relevant contexts.

- **Personnel of HR Departments** – All Personal Data relating to HR and Recruitment.
- **Personnel of Finance Departments** – Personal Data to the extent related to payroll, compensation, expense reimbursements, etc.
- **Supervisors and Managers** – Elements of Personal Data to the extent permitted in the jurisdiction, to the extent necessary to evaluate, establish, and maintain the employment or contractual relationship, conduct reviews, handle compliance obligations, and similar matters.
- **Department Managers searching for new employees or contractors** – Personal data of job candidates contained in job applications to the extent allowed by relevant laws and departmental needs.
- **IT Administrators** of CO-OP and/or third parties who support the management and administration of HR processes may receive Personal Data as necessary for providing relevant IT related support services (for example, conducting IT security measures and IT support services).
- **Peers and colleagues** – Elements of Personal Data in connection with company address books, intracompany and interpersonal communications, and other contexts relevant to the day-to-day operation of company business.

CATEGORIES OF EXTERNAL RECIPIENTS

CO-OP may provide HR Personal Data to external third parties as described below. The specific information disclosed may vary depending on context, but will be limited to the extent reasonably appropriate given the purpose of processing and the reasonable requirements of the third party and CO-OP. We generally provide information to:

- Our subsidiaries, affiliates, and parent company.
- Service providers, vendors, and similar data processors that process Personal Data on CO-OP's behalf (e.g., analytics companies, financial analysis/budgeting, trainings, benefits administration, payroll administration, background checks, etc.) or that provide other services for our Personnel or for the CO-OP.
- To prospective seller or buyer of such business or assets in the event CO-OP sells or buys any business or assets.

- To future CO-OP affiliated entities, if the CO-OP or substantially all of its assets are acquired by a third party, in which case Personal Data held by it about its employees and contractors will be one of the transferred assets.
- To your employment references, in order to inform them that you have applied with the CO-OP as part of our recruiting process.
- To future prospective employers seeking to confirm your relationship with the CO-OP.
- To government agencies or departments, employee unions, or similar parties in connection with employment related matters.
- To any public authority in relation to national security or law enforcement requests, if the CO-OP is required to disclose Personal Data in response to lawful requests by a public authority.
- To any other appropriate third party, if the CO-OP is under a duty to disclose or share your Personal Data in order to comply with any legal obligation or to protect the rights, property, health, or safety of the CO-OP, our employees, contractors, customers, or others.

Locations of Recipients

The CO-OP and some CO-OP affiliates are located in the United States. Any Personal Data collected under this Policy will likely be processed in the United States, in addition to any other jurisdiction where such CO-OP affiliate is located.

PURPOSES FOR COLLECTING, USING, AND DISCLOSING PERSONAL DATA

The CO-OP collects Personal Data about its prospective, current, and former Personnel and other individuals as appropriate in the context of an employment or contractual work relationship (such as dependents) for various general HR and business purposes, as described below. We do not sell or “share” (as defined in CCPA) HR Personal Data with third parties in exchange for monetary consideration or for advertising purposes.

GENERAL HR PURPOSES

The CO-OP collects Personal Data about its prospective, current, and former employees, job applicants, contractors and other individuals as appropriate in the context of an employment or contractual work relationship, including for recruitment and IT/technical support services, and as needed for using internal software, networks and devices. The categories of Personal Data we process, along with representative data elements, are listed in the chart below. We may not collect from you or process all of the Personal Data identified below, depending on your position or the nature of your relationship with the CO-OP.

We generally process Personal Data for the following purposes:

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| Personal Data pertaining to <u>prospective</u> | <ul style="list-style-type: none"> • Recruitment and staffing, including evaluation of skills and job placement. |
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employees or contractors may be processed for:

- Hiring decisions, including negotiation of compensation, benefits, relocation packages, etc.
- Risk management, including reference and other background checks.
- Our Business Purposes (defined below).

Personal Data pertaining to current employees and contractors may be processed for:

- Staffing and job placement, including scheduling and absence management.
- Verification of eligibility to work and compliance with immigration laws, rules and regulations.
- Administration of compensation, insurance and benefits programs.
- Time and attendance tracking, expense reimbursement, other workplace administration and facilitating relationships within the CO-OP.
- Technology support uses, such as managing our computers and other assets, providing email and other tools to our workers.
- EEO programs.
- Internal and external directories of Personnel.
- Health and wellness programs.
- Reasonable accommodations.
- Occupational health and safety programs (including required injury and illness reporting, disaster recovery and business continuity planning, and workers' compensation management).
- Health and safety requirements imposed by the CO-OP, government authorities, or others, depending on the location of employment, engagement or travel (e.g. vaccination status or health screening).
- Talent and performance development, skills management and training, performance reviews, employee feedback surveys, and recognition and reward programs.
- HR support services, such as responding to inquiries, providing information and assistance.
- Employee relations, such as implementing and administering HR policies, investigations, and resolving disputes or concerns that you may raise.
- Risk management and loss prevention, including employee and premises monitoring.
- Implementing an effective sickness absence management system including monitoring the amount of leave and subsequent actions to be taken, such as making adjustments.

- Managing statutory leave programs such as family and parental leave.
- Succession planning and adjustments for restructuring.
- As requested by individuals, including to verify employment and income verifications (e.g., for mortgage applications).
- Facilitating obligations to unions, including under applicable collective bargaining agreements
- Business Purposes (defined below).

Personal Data pertaining to ***former*** employees and contractors may be processed for:

- Re-employment.
- Administration of compensation, insurance and benefits programs.
- Expense reimbursements.
- For archival and recordkeeping purposes.
- Responding to claims for unemployment benefits and other government inquiries.
- As requested by individuals, including employment and income verifications (e.g., for mortgage applications).
- EEO/Affirmative Action programs.
- Business Purposes (defined below).

Personal Data pertaining to individuals whose information is provided to the CO-OP in the course of HR management (such as information pertaining to employees' family members, beneficiaries, dependents, emergency contacts, etc.) may be processed for:

- Administration of compensation, insurance and benefit programs.
- Workplace administration.
- To comply with child support orders or garnishments.
- To maintain emergency contact lists and similar records.
- Business Purposes (defined below).

BUSINESS PURPOSES

"Business Purposes" means the following purposes for which Personal Data may be collected, used and shared:

- Maintaining comprehensive and up-to-date Personnel records.
- Establishing, managing, or terminating the employment or other working relationship.
- Maintaining a safe and respectful workplace and improving Personnel satisfaction and performance.

- Identity and credential management, including identity verification and authentication, issuing ID card and badges, system administration and management of access credentials.
- Security, safety, loss prevention, information security, and cybersecurity.
- Legal and regulatory compliance, including without limitation all uses and disclosures of Personal Data that are required by court orders and applicable laws, regulations, orders and ordinances, and for compliance with legally-mandated policies and procedures, such as anti-money laundering programs, security and incident response programs, intellectual property protection programs, and corporate ethics reporting system, and other processing in connection with the establishment and defense of legal claims.
- Corporate audit, analysis, and consolidated reporting.
- To enforce our contracts and to protect the CO-OP, our workers, our clients and their employees and the public against injury, theft, legal liability, fraud or abuse, to people or property.
- As needed to de-identify the data or create aggregated datasets, such as for consolidating reporting, research, or analytics.
- Making back-up copies for business continuity and disaster recovery purposes, and other IT support, debugging, security, and operations.
- For the operations, analysis, upgrade, enhancement, development, or improvement internal IT or other services, operations, and similar matters.
- As needed to facilitate corporate governance.

DATA ADMINISTRATION

SECURITY

The CO-OP requires that Personal Data be protected using technical, administrative, and physical safeguards, as described in our various security policies. The CO-OP staff must follow the security procedures set out in applicable security policies at all times.

RETENTION AND DISPOSAL

The CO-OP intends to retain Personal Data or Sensitive Personal Data (as defined above) for no longer than is reasonably necessary and proportionate to achieve the legitimate business purpose for which it was collected or to satisfy a legal requirement. What is necessary may vary depending on the context and purpose of processing. We generally consider the following factors when we determine how long to retain data (without limitation):

- Retention periods established or necessary under applicable law;
- Industry and human resources best practices;
- Whether the purpose of processing is reasonably likely to justify further processing;
- Risks to individual privacy in continued processing;
- Applicable data protection impact assessments;
- IT systems design considerations/limitations; and

- The costs associated continued processing, retention, and deletion.

The CO-OP staff must follow any applicable records retention schedules and policies and destroy any media containing Personal Data or Sensitive Personal Data in accordance with applicable company policies. Personal Data shall not be further processed in a manner that is incompatible with these purposes.

We retain certain Personal Data for specific periods, as follows:

Category of Personal Data	Retention Period OR Criteria Used to Determine Retention Period
Contact Data	Length of employment plus 7 years unless otherwise required by law.
Identity Data	Length of employment plus 7 years unless otherwise required by law.
Government ID Data	Length of employment plus 7 years unless otherwise required by law.
Biographical Data	Length of employment plus 7 years unless otherwise required by law.
Transaction and Interaction Data	Length of employment plus 7 years unless otherwise required by law.
Financial Data	Length of employment plus 7 years unless otherwise required by law.
Health Data	Length of employment plus 7 years unless otherwise required by law.
Device/Network Data	Length of employment plus 7 years unless otherwise required by law.
Audio/Visual Data	Length of employment plus 7 years unless otherwise required by law.
Inference Data	Length of employment plus 7 years unless otherwise required by law.
Compliance and Demographic data	Length of employment plus 7 years unless otherwise required by law.
Protected Category Data	Length of employment plus 7 years unless otherwise required by law.
Special Category Data	Length of employment plus 7 years unless otherwise required by law.

Sensitive Personal Information	Length of employment plus 7 years unless otherwise required by law.
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YOUR RIGHTS AND CHOICES

YOUR RIGHTS, INCLUDING YOUR CALIFORNIA PRIVACY RIGHTS

Under the California Consumer Privacy Act (“**CCPA**”) and other comprehensive state privacy laws, you may have the following rights, subject to your submission of an appropriately verified request (see below for [verification requirements](#)):

<i>Right to Know</i>	You may request any of following, for the 12 month period preceding your request: (1) the categories of Personal Data we have collected about you, or that we have sold, or disclosed for a commercial purpose; (2) the categories of sources from which your Personal Data was collected; (3) the business or commercial purpose for which we collected, sold or shared your Personal Data; (4) the categories of third parties to whom we have sold or shared your Personal Data, or disclosed it for a business purpose; and (5) the specific pieces of Personal Data we have collected about you.
<i>Right to Delete</i>	You have the right to delete certain Personal Data that we hold about you, subject to exceptions under applicable law.
<i>Right to Correct</i>	You have the right to correct certain Personal Data that we hold about you, subject to exceptions under applicable law.
<i>Right of Non-retaliation</i>	You have the right to not to receive discriminatory treatment as a result of your exercise of rights conferred by the CCPA.
<i>Direct Marketing</i>	You may request a list of Personal Data we have disclosed about you to third parties for direct marketing purposes during the preceding calendar year, if applicable.
<i>Minors’</i>	<p>To the extent we have actual knowledge that we collect or maintain Personal Data of a minor under age 16, those minors between the age of 13 and 16 must opt in to any sharing of personal information (as defined under CCPA), and minors under the age of 13 must have a parent consent to sharing of personal information (as defined under CCPA). All minors have the right to opt-out later at any time.</p> <p>Minors under age 13 may have other rights under the Children’s Online Privacy Protection Act (“COPPA”).</p>

SUBMISSION OF REQUESTS

Current CO-OP employees can review and update much of their Personal Data via the CO_OP employee portal (Paycom).

If you are a current CO-OP employee, you can send an email to hr-group@sac.coop to submit requests to exercise your rights in Personal Data subject to this HR Privacy Notice, to the extent you have those rights under applicable law. You may also contact your HR Office for assistance. If you are [a contractor, or an applicant, former employee, beneficiary, dependent, or family member,] please contact us at the address or email listed below for assistance with your privacy requests. For all other questions or comments about this HR Privacy Notice or our privacy practices, please contact hr-group@sac.coop.

FOR FORMER EMPLOYEES, BENEFICIARY, DEPENDENT OR FAMILY MEMBER

Human Resources Department
c/o Sacramento Natural Foods Co-op
2820 R St.
Sacramento, CA 95816
Re: Data Rights Requests

hr-group@sac.coop

916-732-3111 for Data Rights Requests

FOR CONTRACTORS

Finance Department
c/o Sacramento Natural Foods Co-op
2820 R St.
Sacramento, CA 95816
Re: Data Rights Requests

accounting-group@sac.coop

916-732-3124 for Data Rights Requests

VERIFICATION OF REQUESTS

Requests to receive a copy of Personal Data, and requests to delete or correct Personal Data, must be verified to ensure that the individual making the request is authorized to make that

request, to reduce fraud, and to ensure the security of your Personal Data. We may require that you log in through the CO-OP employee portal (if you are a current employee, and/or that you provide the email address we have on file for you (and verify that you can access that email account) as well as an address, phone number, or other data we have on file, in order to verify your identity. If an agent is submitting the request on your behalf, we reserve the right to validate the agent's authority to act on your behalf.