## RESTAURANT SUPPLY CHAIN SOLUTIONS ®, LLC ("RSCS") PRIVACY POLICY STATEMENT

Effective Date: May 5, 2023

Last Updated: May 5, 2023

This privacy policy statement ("Privacy Policy") describes information Restaurant Supply Chain Solutions, LLC ("RSCS"), may collect when you visit websites owned or operated by RSCS ("the Site"). References in this Privacy Policy to "we" and "us" refer to RSCS. We are committed to maintaining your privacy and take the issue of collecting and processing your personal data seriously. Please read this statement carefully. If you do not agree, please do not access or use the Site. By accessing or using the Site, or by clicking "I agree," you agree to this Privacy Policy. If we make changes to the Privacy Policy, we will notify you by updating this statement on the Site. Your continued use of the Site after the statement is modified is deemed to be acceptance of those modifications.

This Privacy Policy applies to information collected when you use the Site and in electronic communications transmitted through the Site. It does not apply to information collected offline. In addition, this Privacy Policy does not apply to information collected by any third parties, whether or not the Site includes links to the websites of those third parties.

#### WHAT INFORMATION DO WE COLLECT?

RSCS collects personal information and non-personal information. For purposes of this Privacy Policy, personal information includes information that identifies, relates to, describes, is reasonably capable of being associated with, or could be reasonably linked to you. RSCS collects some information that is about you individually, but does not identify you, and collects information about your internet connection, your device used to access the Site, and your use of the Site. If RSCS combines that information with personal information, we will treat it as personal information.

## HOW DO WE COLLECT YOUR INFORMATION AND FOR WHAT PURPOSE?

RSCS collects personal information in a variety of ways. For example, you may provide us your personal information when you place an order, register for an account, make an online purchase, send us messages, subscribe to our mailing lists or other forms of marketing communications, submit a job application, redeem a promotion, or use some other feature of the Site.

The categories of personal information we collect may include:

## **Information you provide:**

- Contact and profile information. RSCS may collect personal information, such as your name, phone number, address, payment card information, business information, postal/zip code, and e-mail address, when you register for our services, place an order for delivery, sign up for our mailing list, or otherwise communicate or interact with us. We use this information to create, verify and personalize your account, to fulfill your request or transaction, to communicate with you directly, and to send you marketing communications in accordance with your preferences.
- **Payment and transaction information**. We may collect information such as items purchased, date and time of your transaction, amount purchased, whether you used a particular coupon or deal, and payment information, such as your credit/debit card details, when you make an online purchase. We use this information to fulfill your order and complete your transaction, detect and prevent fraud, and to inform our advertising and marketing.
- Comments, chat, and opinions. When you contact us directly (e.g., by email, phone, mail or by completing an online form or participating in online chat), we may transcribe your comments and opinions. We may also store comments and opinions you express when responding to surveys, entering a contest or sweepstakes or taking part in a promotion. We use this information to respond to your question or comment, to evaluate and improve our products and services and to inform our marketing and advertising activities. When you contact us directly to submit a concern, complaint or question, we may transcribe your comments and collect the personal information contained in your communications (e.g., contact information, etc.). We use this information to respond to your questions or concerns and to evaluate and improve our products and services.

#### INFORMATION WE COLLECT WHEN YOU USE OUR SITE:

**Location information.** RSCS may collect information about your general location if you provide your address or we may approximate your location based on your IP address. RSCS may use your location information to provide personalized content and advertising, to enhance your shopping or website viewing experience, to allow you to view products available to you based on your location, to assist us with analytics, to improve the effectiveness of our Site, advertising, and customer service. Google uses various technologies to determine your location, including your IP address, GPS, and other sensors that may, for example, provide Google with information on nearby devices, Wi-Fi access points, and cell towers (see the Google Maps <a href="Privacy Policy">Privacy Policy</a> to learn more).

**Information you may post or submit to our Sites**. RSCS may collect information about how you use and interact with the Site.

**Information collected from applicants for employment**. If you apply for a job through our Site, we collect the information you include in your application, which could include your name, address, phone number, email address as well as sensitive personal information including your work or education background and history and other such information. We may also obtain information about you from your references. We may also receive this information if you submit an application through a third party site or service, or if we receive your information through a recruiter or employment agency. We collect and use the personal information of applicants for employment to evaluate the application and the suitability of employment, and use sensitive personal information collected according to relevant applicable law.

This information will be retained for a period defined by our retention policies, which is tailored to the legal requirements of the location for which you are applying. We may retain an applicant's personal information for a reasonable time period after the date of application for the purpose of assessing an individual's suitability for other employment opportunities within our organization, though we have no obligation to do so and the applicant may wish to submit another application to be considered for another job opening of interest.

#### HOW DO WE USE YOUR PERSONAL INFORMATION

To fulfil your requests and provide our services to you. For example, RSCS may use your information to complete your order or other online transactions, deliver orders you place online, or respond to your customer service requests or feedback. We may also use your information to personalize your experience with us. This processing is necessary to perform our contracts with you.

For marketing and analytics purposes. RSCS may send you communications about new features, updates, products, and special offers. We may also use your information to serve you ads about products or services we think you might find interesting. We may also use individual and aggregate information about you to develop more complete customer profiles to develop new services, understand our customers, and to inform our marketing and advertising campaigns. For more information on your choices about marketing communications, see "Your Choices and Control Over Your Information" below and our Cookie and Ads Policy, available on our Site. This processing is necessary for our legitimate interest, namely to inform and direct our marketing.

To communicate with you. For example, RSCS may communicate with you about your account activities, such as by providing you transaction confirmations or updating you about employment opportunities for which you've applied. If you register with us, we may enroll you in our email newsletter or other periodic electronic communications and may also send you user surveys and promotional communications. RSCS may communicate with you by email, postal mail, telephone, text message, or other means. This processing is necessary for our legitimate interest, namely to answer your questions and comments, to evaluate and improve our services, and to inform and direct our marketing.

**To monitor, improve and develop our products and services**. RSCS may use your information to understand our visitors and customers and tailor our services accordingly. We may use your interactions with our services as the basis for developing new customer service capabilities. From time to time, we analyze statistics and trends to make our Site and services better and to develop new services or features. This processing is necessary for our legitimate interest, namely to evaluate and improve our services.

To protect the security and integrity of our business, comply with legal requirements and obligations, or as otherwise permitted by law. RSCS may use information to protect our company, our customers, and our Site. We may also use information in order to comply with laws, regulations, court orders, or other legal obligations or to assist in an investigation, to protect and defend our rights and property, or the rights or safety of third parties, to enforce our Terms of Use, this Policy, or agreements with third parties, to detect and prevent fraud or for crime-prevention purposes, or for any other reason permitted by law. This processing is necessary for our legitimate interest, namely to comply with applicable law and the detection and prevention of fraud.

#### HOW DO WE PROTECT YOUR INFORMATION

Helping to keep your personal data safe against loss, misuse, unauthorized access, disclosure, and alteration is our top priority.

To protect your personal data, we use technical, physical, and administrative security measures, but no security measures can be guaranteed as one hundred percent secure. While we protect our systems and services, you're responsible for keeping your password(s) and account information private. You are also responsible for making sure your personal information is accurate and up to date.

If your account is closed, we may keep your personal data and other information as required by law and according to our data retention policy. If we do, we'll continue to handle your personal information as we describe in this statement.

## WHAT INFORMATION DO WE SHARE WITH OTHERS?

We may contract with other companies to provide certain services to RSCS, including credit card processing, shipping, name and address verification, sponsorships, email distribution, market research, marketing, warranty services, advertising services (including advertising on third party websites, social media networks and profiling), and promotions management. We provide these companies with only the information they need to perform their services.

For certain websites, we also engage third-party service providers to assist with the collection and monitoring of data regarding website traffic, as well as marketing and advertising. These third parties use cookies and other tracking technologies to analyze behavior, track movements around certain websites, gather demographic information and other data, assist with email marketing and communications, and may provide targeted and retargeted advertisements. If the website you are visiting uses cookies, please refer to that website's Cookie Policy for more information.

#### LINKED SITES ON OUR WEBPAGE

These and other linked sites have separate and independent privacy policies. We encourage you to review those policies when you visit those sites. This Privacy Policy Statement only covers websites owned or operated by RSCS and does not cover the privacy practices of any other website. We therefore have no responsibility or liability for the content and activities of any linked sites.

#### **DATA TRANSFER:**

We may transfer personal data that we collect from you to third party data processors or servers located in the United States and Europe in connection with the above purposes. The privacy protections in the United States and Europe may not be the same as in your home country. If you submit personal information to RSCS, you consent to the general use and disclosure of such information as provided in this Privacy Policy and to the transfer and/or storage of that information outside of your home country and to the United States and Europe. Any such transfer of your personal data will be carried out in compliance with applicable laws and we will treat the information in a manner consistent with this Privacy Policy. However, we will not pass your information on to any other companies or other third parties for their own marketing purposes.

This means that we use your information for marketing, promotional, and all other legitimate business or commercial purposes. We don't sell, trade, give away, or rent your personal information, except as disclosed in this statement.

#### **DATA RETENTION**

RSCS will retain your personal information as long as reasonably necessary to maintain services to you, to meet legal and accounting obligations, and for the other purposes described in this Policy, or as otherwise required or permitted by law. RSCS may anonymize and/or aggregate personal information and store it in order to analyze aggregate metrics and trends.

## ANONYMIZED DATA

RSCS will not attempt to re-identify your information that has been deidentified, in the course of providing services to other organizations.

#### GOOGLE ANALYTICS.

This Site may use Google Analytics. Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google Analytics assists RSCS with collecting and monitoring data about traffic to the Site. Google Analytics collects visitation information via Google advertising cookies and identifiers. You can learn how Google collects and processes data by visiting the following website: <a href="www.google.com/policies/privacy/partners/">www.google.com/policies/privacy/partners/</a>. If you would like to opt-out of the collection of data by Google Analytics, visit <a href="https://tools.google.com/dlpage/gaoptout/">https://tools.google.com/dlpage/gaoptout/</a>. For information about how to opt out of Google Marketing Platform's use of cookies, visit <a href="https://optout.networkadvertising.org/?c=1">https://optout.networkadvertising.org/?c=1</a>. For more information about targeting and advertising cookies and how to opt out of those,

visit <u>www.optout.aboutads.info</u>. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

Google Analytics collects data about how you use a website. At its most basic, it will collect: Time of visit, pages visited, and time spent on each page of the webpages, Referring site details (such as the URL a user came through to arrive at this site), Type of web browser, Type of operating system (OS), Flash version, JavaScript support, screen resolution, and screen color processing ability, Network location, document downloads, clicks on links leading to external websites, errors when users fill out forms, clicks on videos, scroll depth, interactions with site-specific widgets, and IP address.

Please see Google policies: <a href="https://policies.google.com/privacy?hl=en-GB&gl=uk">https://policies.google.com/privacy?hl=en-GB&gl=uk</a>

If you want to stop websites collecting website usage data about you via Google Analytics, you can: disable cookies in your browsers, disable Javascript in your browser, use Google's Opt-out browser add-on, or use a third-party tool.

The first two options will affect your online experience (some features or functionality may not work).

#### COOKIES

RSCS may use the following technologies to collect data as you visit the Site. To learn more about RSCS's use of cookies and your choices on various websites owned and operated by RSCS, please see RSCS's <u>Cookie Policy</u> for that particular website.

"Cookies" are small pieces of data that a website, when visited by a user, asks your browser to store on your device in order to remember information about you, such as your language preference or login information. Cookies set by RSCS are called first party cookies. Third party cookies are cookies from a domain different than the domain of the website you are visiting. Cookies can be either persistent or temporary. A persistent cookie retains user preferences for a particular website, allowing those preferences to be used in future sessions and remains valid until its set expiry date (unless deleted by the user before the expiry date). Temporary cookies expire at the end of a user session when the browser is closed.

Most internet browsers are initially set to accept cookies. Cookies are classified in the following categories: Necessary Cookies, Performance Cookies, and Functional Cookies. You cannot opt-out of Necessary Cookies, but you can opt out of the other cookie categories by clicking on

the "cookie settings" button in your browser, in this policy, or in the applicable website cookie notice. If you decline the use of cookies or set your browser to refuse cookies, then you may not be able to access or use portions of this Site.

"Web beacons" and "pixels" are small bits of code embedded in web pages or emails that assist in delivering cookies and measuring statistics. Web beacons and pixels help RSCS determine whether a page on this Site has been viewed and, if so, how many times. RSCS may also use web beacons and pixels in email messages to determine what the recipient has done with the message. Although you cannot decline to receive web beacons and pixels when visiting a web page, you can choose not to receive them by email if you disable HTML images or refuse HTML email messages.

## FOR EEA RESIDENTS: YOUR RIGHTS.

If you reside in the European Economic Area (the "EEA"), the following provisions apply to you:

## 1. Right to access your personal data

You have a right to access the personal data that we hold on you and the following information regarding our use of it: (i) purpose of the use, (ii) categories of personal information used, and (iii) to whom we have disclosed your personal information. If you would like a copy of the personal information that we hold on you, please contact us.

# 2. Right to correct and update your personal data

You also have a right to require that any inaccurate personal data that we hold on you is corrected. If you find that any of your personal data is incorrect, please contact us.

# 3. Right to be forgotten/request that we delete your personal data

You may request that RSCS erase your personal information when RSCS no longer needs such data. For implementation on your rights including the "right to be forgotten," please contact us.

# 4. Right to withdraw consent

If RSCS's ability to use your personal information depends on consent you have given, you may withdraw such consent.

# 5. Right to restriction

You may request that RSCS restrict (or suspend) use of your personal information.

## 6. Right to object

You may object to RSCS's use of your personal information to perform services you have not requested.

## 7. Right to portability

You may request copies of your personal information that RSCS possesses in a structured, commonly used, and machine readable format, and you may request that this be transmitted to another controller.

# 8. Complaint

You may lodge a complaint with the supervising authority of your country.

- 9. Accept or reject the cookies that we use before browsing or shopping on our website
- 10. Right not be discriminated for exercising your privacy rights

# FOR IMPLEMENTATION OF THESE RIGHTS email us by writing to dataprotection of ficer @RSCS.com.

If you have any questions or concerns about personal data or this privacy policy or you wish to make a complaint about how we have processed your personal data, please contact us by writing to <a href="mailto:dataprotectionofficer@RSCS.com">dataprotectionofficer@RSCS.com</a>.

You also have the right to lodge a complaint to your local data protection authority. Further information about how to contact your local data protection authority is available at <a href="http://ec.europa.eu/justice/data-protection/bodies/authorities/index\_en.htm">http://ec.europa.eu/justice/data-protection/bodies/authorities/index\_en.htm</a>.

## **DELETING YOUR PERSONAL DATA**

The personal data that we hold may be retained and stored for a period after our relationship has ended. The length of the storage period is determined by the relevant local law, company policies, and regulations. We will delete your personal data once it is no longer required for the processing purposes to which you consented. Where regulatory requirements require us to keep data on you for a longer period we will do so. After the storage period has expired we shall securely destroy all of your personal data, except where such data is required in litigation, or has been requested by a supervisory body or other law enforcement agency, or where you or other data subjects concerned have requested that this data be retained (and paid an appropriate fee to do so).

## PROTECTING CHILDREN'S PRIVACY

We do not knowingly solicit or collect personal information from children under the age of 13 without parental consent. If we learn that we have collected personal information from a child under age 13 without parental consent, we will promptly delete that information. If you believe that a child under age 13 may have provided us with personal information without parental consent, please contact us as specified in the "UNSUBSCRIBE" section of this policy.

## DO NOT TRACK DISCLOSURE

Do Not Track ("DNT") is a web browser setting that requests that a web application disable its tracking of an individual user. When you choose to turn on the DNT setting in your browser, your browser sends a signal to websites and webserver to cease all tracking activities.

## **NEVADA RESIDENTS**

Under Nevada law, Nevada residents may submit a request directing RSCS not to make certain disclosures of personal information we maintain about them. If you are a Nevada resident and wish to exercise this right, you may contact us by email at <u>dataprotectionofficer@RSCS.com</u>.

## ADDITIONAL STATE PRIVACY RIGHTS

Colorado, Connecticut, Virginia, and Utah each provide their state residents with rights to:

- Confirm whether or not a controller is processing their personal data and to access such personal data;
- Correct inaccuracies in their personal data, taking into account the nature of the personal data and the purposes of the processing of the personal data;
- Delete their personal data; and
- Opt out of the processing of the personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarity significant effects concerning the consumer.

Colorado, Connecticut, and Virginia also provide their state residents with rights to:

- Correct inaccuracies in their personal data, taking into account the nature of the personal data and the purposes of the processing of the personal data;
- Opt out of the processing of the personal data for the purposes of targeted advertising, the sale of personal data, or profiling in furtherance of decisions that produce legal or similarity significant effects concerning the consumer.

To exercise any of these rights or to appeal a decision regarding a consumer rights request, you may contact us by email at <a href="mailto:dataprotectionofficer@RSCS.com">dataprotectionofficer@RSCS.com</a>. We will respond to all appeal requests as soon as we reasonably can, and no later than legally required.

# HOW THIS STATEMENT CHANGES OVER TIME

We'll make changes to this privacy statement from time to time. This helps us stay up to date with changes to our business and the most current laws. After a new version is published, we'll collect, store, use, and protect your personal data as we outline in that revised statement.

If the new version reduces your rights or increases your responsibilities, we'll post it on the Policy Updates or Privacy Statement page of our website.

We may notify you about these changes through email or other communications.

# **CONTACT US**

If you have any questions or comments about this statement or RSCS's privacy practices, please contact RSCS at <a href="mailto:dataprotectionofficer@RSCS.com">dataprotectionofficer@RSCS.com</a>.

# UNSUBSCRIBE

If you do not wish to be contacted for marketing purposes or receive newsletters, we offer a range of ways in which you can inform us about your marketing preferences:

- All email messages and email newsletters will contain information on how you can unsubscribe;
- Email us at dataprotectionofficer@RSCS.com; or

#### SUPPLEMENTAL NOTICE FOR CALIFORNIA RESIDENTS

Last Updated: May 5, 2023

This Supplemental Privacy Notice for California Residents (this "Supplemental Notice") supplements RSCS's Privacy Policy and applies to you if you reside in California. This Supplemental Notice is adopted to comply with the California Consumer Privacy Act of 2018 (the "CCPA") as amended by the California Privacy Rights Act of 2020 (collectively, the "CPRA"). This Supplemental Notice also addresses requirements of certain other California privacy laws. Capitalized terms used without definition shall have the meanings ascribed to them in the Privacy Policy and other undefined terms shall have the meanings ascribed to them in the CPRA.

**Information We Collect**. The Site collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked to a consumer or personal device. For purposes of this Supplemental Notice, such information constitutes personal information. Below are categories of personal information recognized by the CPRA along with examples (provided by the CPRA) of types of personal information in each category:

- *Identifiers*. Real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
- *CA Customer Records Statute categories*. Name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
- Protected Class Characteristics. Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
- *Commercial Information*. Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
- *Biometric Information*. Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, face prints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.

- *Internet/network activity*. Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
- Geolocation data. Physical location or movements
- Sensory data. Audio, electronic, visual, thermal, olfactory, or similar information
- Professional/employment-related information. Current or past job history or performance evaluations
- Non-public education information. Education records directly related to a student maintained by an educational institution
  or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student
  financial information, or student disciplinary records
- Inferences drawn from other personal information. Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes
- Sensitive Personal Information. Racial/ethnic origin, political opinions, religious or philosophical beliefs, genetic data, biometric data, sex life / sexual orientation, union membership, past or spent criminal convictions, mail, email and text message content, precise geolocation data, social security, driver's license, state identification card, passport number, account login, financial account, debit card, or credit card number.

For purposes of this Supplemental Notice, the term "personal information" has the meaning given in the CPRA and does not include information exempted from the scope of the CPRA. For example, for the purposes of this Supplemental Notice, "personal information" does not include:

- Publicly available information or lawfully obtained, truthful information that is a matter of public concern;
- Deidentified, aggregated or anonymized information that is maintained in a form that is not capable of being associated with or linked to you; or
- Information excluded from the CPRA's scope, such as health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data; or information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

## **USE OF PERSONAL INFORMATION**

RSCS uses the personal information it collects in the ways described in the HOW DO WE COLLECT YOUR INFORMATION AND FOR WHAT PURPOSE? section of the Privacy Policy. RSCS may use the personal information for commercial purposes as well as business purposes, as disclosed in the Privacy Policy.

#### CPRA NOTICE AT COLLECTION

The chart below summarizes the personal information RSCS collects by reference to the categories of personal information specified in the CPRA and describes our practices currently and during the twelve (12) months preceding the effective date of this Supplemental Notice. The terms in the chart refer to the categories of information, categories of sources, purposes for collection, and categories of third parties to whom we disclose, sell or share personal information that are described in further detail in our Privacy Policy. In addition, our Privacy Policy provides more detail on the purposes for which we sell or share personal information with specific categories of third parties. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

FOR CALIFORNIA CONSUMERS WHO ARE NOT APPLICANTS FOR EMPLOYMENT

Personal Information ("PI") we collect	CPRA statutory category	Source of PI	Business/ commercial purpose for PI collection	Categories of third parties to whom we "disclose" PI for a business purpose *	Categories of third parties to whom we "sell" or "share" Pl
Contact and profile information	<ul><li> Identifiers</li><li> Commercial information</li><li> California customer records</li></ul>	<ul> <li>You</li> <li>Our business partners (including franchisees), Brands, subsidiaries and affiliates</li> </ul>	<ul> <li>Service delivery and operations</li> <li>Analytics, research and development</li> <li>Marketing &amp; advertising</li> </ul>	<ul> <li>Our business partners         (including franchisees),         Brands, subsidiaries and         affiliates</li> <li>Your representatives and         third parties at your</li> </ul>	<ul> <li>Our business partners</li> <li>Select marketing and strategic business partne</li> <li>Advertising partners (to facilitate online</li> </ul>

<ul> <li>Contact and profile information</li> </ul>	<ul> <li>Identifiers</li> <li>Commercial information</li> <li>California customer records</li> </ul>	<ul> <li>You</li> <li>Our business partners         (including franchisees),         Brands, subsidiaries and         affiliates</li> <li>Third-party sources</li> <li>Data providers</li> <li>Your representatives</li> <li>Social networks</li> </ul>	<ul> <li>Service delivery and operations</li> <li>Analytics, research and development</li> <li>Marketing &amp; advertising</li> <li>Compliance &amp; protection</li> <li>With your consent</li> <li>To create aggregated, deidentified and/or anonymized data</li> </ul>	<ul> <li>Our business partners         (including franchisees),         Brands, subsidiaries and         affiliates</li> <li>Your representatives and         third parties at your         request</li> <li>The public</li> <li>The additional third parties         identified below *</li> </ul>	<ul> <li>Our business partners</li> <li>Select marketing and strategic business partne</li> <li>Advertising partners (to facilitate online advertising)</li> <li>Website function vendors</li> </ul>
Payment and transaction information	<ul> <li>Identifiers</li> <li>Commercial information</li> <li>California consumer records</li> <li>Sensitive personal information</li> </ul>	<ul> <li>You</li> <li>Our business partners, subsidiaries and affiliates</li> <li>Third-party sources</li> <li>Your representatives</li> <li>Social networks</li> </ul>	<ul> <li>Service delivery and operations</li> <li>Analytics, research and development</li> <li>Marketing &amp; advertising</li> <li>Compliance &amp; protection</li> <li>With your consent</li> <li>To create aggregated, deidentified and/or anonymized data</li> </ul>	<ul> <li>Our business partners</li> <li>Your representatives and third parties at your request</li> <li>The additional third parties identified below *</li> </ul>	<ul> <li>Our business partners</li> <li>Promotional partners</li> <li>Select marketing and strategic business partne</li> <li>Advertising partners (to facilitate online advertising)</li> <li>Website function vendors</li> </ul>

• Location information	<ul> <li>Identifiers</li> <li>Internet or Network         Information     </li> </ul>	<ul> <li>Automatic collection from your browser or device</li> <li>Third-party sources</li> </ul>	<ul> <li>Service delivery and operations</li> <li>Analytics, research and development</li> <li>Marketing &amp; advertising</li> <li>Compliance &amp; protection</li> <li>With your consent</li> <li>To create aggregated, deidentified and/or anonymized data</li> </ul>	<ul> <li>Our business partners         (including franchisees),         Brands, subsidiaries and         affiliates</li> <li>Your representatives and         third parties at your         request</li> <li>The additional third parties         identified below *</li> </ul>	<ul> <li>Our business partners, subsidiaries and affiliate</li> <li>Promotional partners</li> <li>Select marketing and strategic business partne</li> <li>Advertising partners (to facilitate online advertising)</li> <li>Website function vendors</li> </ul>
Information you post or submit to our Sites	<ul> <li>Identifiers</li> <li>Commercial information</li> <li>California customer records</li> </ul>	<ul> <li>You</li> <li>Your representatives</li> </ul>	<ul> <li>Service delivery and operations</li> <li>Analytics, research and development</li> <li>Marketing &amp; advertising</li> <li>Compliance &amp; protection</li> <li>With your consent</li> <li>To create aggregated, deidentified and/or anonymized data</li> </ul>	<ul> <li>Our business partners         (including franchisees),         Brands, subsidiaries and         affiliates</li> <li>Your representatives and         third parties at your         request</li> <li>The public</li> <li>The additional third parties         identified below *</li> </ul>	<ul> <li>Our business partners</li> <li>Promotional partners</li> <li>Select marketing and strategic business partne</li> <li>Advertising partners (to facilitate online advertising)</li> <li>Website function vendors</li> </ul>
Automatic data collection (e.g., online activity data)	<ul> <li>Identifiers</li> <li>Internet or Network         Information     </li> </ul>	Automatic collection from your browser or device	<ul> <li>Service delivery and operations</li> <li>Analytics, research and development</li> <li>Marketing &amp; advertising</li> <li>Compliance &amp; protection</li> <li>With your consent</li> <li>To create aggregated, deidentified and/or anonymized data</li> </ul>	<ul> <li>Our business partners, subsidiaries and affiliates</li> <li>Your representatives and third parties at your request</li> <li>The additional third parties identified below *</li> </ul>	<ul> <li>Our business partners</li> <li>Promotional partners</li> <li>Select marketing and strategic business partne</li> <li>Advertising partners (to facilitate online advertising)</li> <li>Website function vendors</li> </ul>
Data derived from the above	• Inferences	• N/A	<ul> <li>Service delivery and operations</li> <li>Analytics, research and development</li> <li>Marketing &amp; advertising</li> <li>Compliance &amp; protection</li> <li>With your consent</li> </ul>	<ul> <li>Our business partners</li> <li>Your representatives and third parties at your request</li> <li>The additional third parties identified below *</li> </ul>	<ul> <li>Our business partners</li> <li>Promotional partners</li> <li>Select marketing and strategic business partne</li> <li>Advertising partners (to facilitate online advertising)</li> </ul>

To create aggregated, de-	Website function vendors
identified and/or	
anonymized data	

FOR CALIFORNIA CONSUMERS WHO ARE APPLICANTS FOR EMPLOYMENT						
ersonal Information ("PI") we collect	CPRA statutory category	Source of PI	Business/ commercial purpose for PI collection	Categories of third parties to whom we "disclose" PI for a business purpose *	Categories of third parties to whom we "sell" or "share" P	
Contact and profile information	<ul> <li>Identifiers</li> <li>Commercial information</li> <li>California customer records</li> <li>Professional or employment-related information</li> <li>Education information</li> <li>Sensitive personal information</li> </ul>	<ul> <li>You (e.g., from your application)</li> <li>Third-party sources (such as recruiter or employment agency)</li> <li>Data providers</li> <li>Your representatives</li> <li>Social networks (e.g., your social media profile)</li> </ul>	<ul> <li>Evaluation of suitability for employment</li> <li>Compliance &amp; protection</li> <li>With your consent</li> <li>To create aggregated, deidentified and/or anonymized data</li> </ul>	parties at your request	• <i>N/A</i>	
Background information     (e.g., work and education     history, reference     information)	<ul> <li>Identifiers</li> <li>Commercial information</li> <li>California customer records</li> <li>Professional or employment-related information</li> <li>Education information</li> <li>Sensitive personal information</li> </ul>	<ul> <li>You (e.g., from your application)</li> <li>Third-party sources (such as recruiter or employment agency)</li> <li>Data providers</li> <li>Your representatives</li> <li>Social networks (e.g., your social media profile)</li> </ul>	<ul> <li>Evaluation of suitability for employment</li> <li>Compliance &amp; protection</li> <li>With your consent</li> <li>To create aggregated, deidentified and/or anonymized data</li> </ul>	parties at your request	• <i>N/A</i>	

<sup>\*</sup> For each of the categories of personal information above, please note the information may also be shared with the following categories of third parties:

- Service providers
- Professional advisors

- Law enforcement, regulators and other parties for legal reasons
- Purchasers and third parties in connection with a business transaction
- With your consent or at your direction

#### RETENTION

We will retain each category of personal information identified above as long as reasonably necessary to maintain the Service provided, to meet legal and accounting obligations, and for the other purposes described in the Privacy Policy, or as otherwise required or permitted by law. We may anonymize and/or aggregate personal information and store it in order to analyze aggregated metrics and trends.

To determine the appropriate retention period for personal information, RSCS considers the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

## YOUR CALIFORNIA PRIVACY RIGHTS

California residents have the rights listed below under the CPRA. However, these rights are not absolute and are subject to certain exceptions, and in certain cases we may decline your request as permitted by law.

- **Information**. You may request the following information about how we have collected and used your personal information during the past 12 months:
  - 1. The categories of personal information that we have collected.
  - 2. The categories of sources from which we collected personal information.
  - 3. The business or commercial purpose for collecting and/or selling or sharing personal information.
  - 4. The categories of third parties to whom we disclose personal information.
  - 5. The categories of personal information that we sold or disclosed or shared for a business purpose.
  - 6. The categories of third parties to whom the personal information was sold, shared or disclosed for a business purpose.
- Access. You may request a copy of the specific pieces of personal information that we have collected about you.
- **Deletion**. You may ask us to delete the personal information that we have collected from you.
- Correction. You may ask us to correct inaccurate personal information that we have collected about you.
- **Opt-out of sales**. You may ask us not to "sell" personal information we have collected about you to third parties now or in the future. The right to opt out of personal information sales is separate from our direct communications with you for marketing purposes.
  - 1. We do not sell the personal information of consumers we know to be less than 16 years of age, unless we receive affirmative authorization (the "Right to Opt In") from either the minor who is between 13 and 16 years of age, or the parent or guardian of a

minor less than 13 years of age. Please contact us at <u>dataprotectionofficer@RSCS.com</u> to inform us if you, or your minor child, are under the age of 16.

- **Opt-out of sharing**. You may request to opt out of cross-context behavioral advertising (targeted advertising based on your personal data).
- **Sensitive personal information**. You have the right to limit the certain uses or disclosures of sensitive personal information; however, we do not use or disclose sensitive personal information for purposes that California residents have a right to limit under the CPRA.
- Nondiscrimination. You are entitled to exercise the rights described above free from discrimination as prohibited by the CPRA. However, please note that if the exercise of these rights limits our ability to process personal information (such as in the case of a deletion or do not sell request), we may no longer be able to provide you our products and services or engage with you in the same manner.
- "Shine the Light." California residents that have an established business relationship with us have rights to know how their information is disclosed to third parties for their direct marketing purposes under California's "Shine the Light" law (Civ. Code § 1798.83).

**Exercising your right to information, access, deletion and correction**. You may submit requests to exercise your right to information, access, deletion or correction by filling out our California Consumer Rights Request Form.

We will need to verify your identity to process your information, access, deletion and correction requests and reserve the right to confirm your California residency. We need to verify your identity before processing your request, which may require us to request additional personal information from you, such as asking you about your residency, requesting government identification or a declaration under penalty of perjury or other information. We will only use personal information provided in connection with a Consumer Rights Request to review and comply with the request.

Your authorized agent may make a request on your behalf upon our verification of the agent's identity and our receipt of a copy of a valid power of attorney given to your authorized agent pursuant to California Probate Code Sections 4000-4465. If you have not provided your agent with such a power of attorney, you must provide your agent with written and signed permission to exercise your CPRA rights on your behalf, provide the information we request to verify your identity, and provide us with confirmation that you have given the authorized agent permission to submit the request.

RSCS cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it. In certain circumstances, we may decline a request to exercise the rights described above, particularly where we are unable to verify your identity or locate your information in our systems. If we are unable to comply with all or a portion of your request, we will explain the reasons for declining to comply with the request.

**Notice of right to opt-out of sales and sharing of personal information.** Unless you have exercised your right to opt-out of sales and sharing of personal information, we may sell personal information to third parties for monetary or other valuable consideration and may share your personal information with third parties for cross-context behavioral advertising.

- *Opt-Out of Sales*. You have the right to direct us not to "sell" personal information we have collected about you to third parties now or in the future. The third parties to whom we sell personal information may use such information for their own purposes in accordance with their own privacy statements, which may include reselling this information to additional third parties. To exercise the right to opt-out of sales of personal information, you may submit a request by clicking the following link:

  Do Not Sell or Share My Personal Information: https://apps.rscs.com/Member/Secure/UFPC/OptOutInfo.aspx
- Opt-Out of Sharing. You have the right to direct us to no "share" personal information for cross-context behavioral advertising (targeted advertising based on your personal data). Like many companies, we use services that help deliver interest-based ads to you. Our use of some of these services may be classified under California law as "sharing" your personal information with the advertising partners that provide the services because they use personal information from our users (e.g., device information and technical usage information) to provide cross-context behavioral advertising. These third parties use this information for the purposes of serving ads that are more relevant, for ad campaign measurement and analytics, and for fraud detection and reporting and may sell that information to other businesses for advertising and other purposes.

By opting out of the sharing of personal information, you will be able to opt out of some sharing of data to third parties for advertising based on your browsing and purchase habits. This will not affect activities within our own website, app, or other activities; responses to online applications; requests for feedback or information; or the processing of your personal information solely for measuring or reporting advertising performance, reach, or frequency. To exercise the right to opt-out of sharing of personal information, you may submit a request by clicking the following link: Do Not Sell or Share My Personal Information:

https://apps.rscs.com/Member/Secure/UFPC/OptOutInfo.aspx

To learn more about how third parties collect information automatically on our Service and the choices you may have in relation to those activities for those of our websites that use cookies, please see the Cookie Policy for the particular website you are visiting.

# CALIFORNIA'S "SHINE THE LIGHT" LAW

Under California's "Shine the Light" law (Civil Code Section §1798.83), California residents may ask companies with whom they have formed a business relationship primarily for personal, family or household purposes to provide the names of third parties to which they have disclosed certain personal information (as defined under the Shine the Light law) during the preceding calendar year for such third parties' own direct marketing purposes, and the categories of personal information disclosed. You may send us requests for this information to

dataprotectionofficer@RSCS.com. In your request, you must include the statement "Shine the Light Request" and provide your first and last name and mailing address and certify that you are a California resident. We reserve the right to require additional information to confirm your identity and California residency. Please note that we will not accept requests via telephone, mail or fax, and we are not responsible for notices that are not labeled or sent properly, or that do not have complete information.

## UPDATES TO THIS SUPPLEMENTAL NOTICE

RSCS will update this Supplemental Notice from time to time. When we make changes to this Supplemental Notice, we will change the "Last Updated" date at the beginning of this Supplemental Notice. All changes shall be effective from the date of publication unless otherwise provided in the notification.

## **CONTACT US**

If you have any questions or requests in connection with this Supplemental Notice or other privacy-related matters, please send an email <a href="mailto:dataprotectionofficer@RSCS.com">dataprotectionofficer@RSCS.com</a>.