

# WISMETTAC ASIAN FOODS CALIFORNIA APPLICANT AND PERSONNEL PRIVACY POLICY

*Last Updated: January 24, 2023*

This California Applicant and Personnel Privacy Policy (“**Policy**”) notifies you about Wismettac Asian Foods, Inc.’s (“**Wismettac**,” “**we**,” or “**us**”) privacy practices, including how we collect, use, and disclose information about you in connection with your employment or other engagement, when you access or use our website at [Wismettacusa.jobs.net](http://Wismettacusa.jobs.net), access or use our careers portal (“**Career Portal**”), or when you otherwise interact with us, such as through our human resources or other support channels.

This Policy sets forth our privacy practices as required by the California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”). The Policy applies only to individuals residing in the State of California who are considered “Consumers” under the CCPA and from whom we collect “personal information” as described in the CCPA. We provide you this notice because, under the CCPA, California Residents who are our current or former employees, officers, directors, contractors, agents, consultants, agent workers, job applicants, and any other individuals who currently work or previously worked for us (collectively, “**Personnel**” or “**you**”) qualify as Consumers. Where we refer to employment, engagement, or work, in this Policy, we do so for convenience only, and this should in no way be interpreted as purporting to confer employment status on non-employees to whom this Policy also applies. This Policy does not form part of any contract of employment or engagement, does not confer any employment status or contractual right on any Personnel, and does not place any contractual obligation on us.

We may change this Policy from time to time. If we make material changes, we will notify you by revising the date at the top of this Policy and, in some cases, we may provide you with additional notice (such as adding a statement to the Career Portal and employee intranet or sending you a notification). We encourage you to review the Policy often to stay informed about our information practices and the choices available to you.

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## APPLICABILITY OF OTHER POLICIES

This Policy does not cover our processing of personal information collected from you as a Wismettac customer or a visitor of our websites outside the scope of your employment, engagement, or application.

To learn more about Wismettac’s privacy practices in these cases, please read our online Privacy Statement at <https://www.wismettacusa.com/privacy-statement/>.

In some cases, you may provide personal information to third parties that we work with. This could be, for example, when you opt-in at your own discretion to services or benefits programs provided by third parties to our personnel. By participating in such services or benefits programs, you understand that the collection of your personal data is subject to separate privacy policies of the third party organizations.

## NOTICE OF COLLECTION OF INFORMATION

We may collect personal information from you in a variety of different situations, including but not limited to, on our website, your mobile device, through email, in physical locations, through the mail, and/or over the telephone. More specifically, in the preceding 12 months, we have collected the following categories of personal information from California Personnel, which will depend on the particular business purpose for which we collect it:

<b>Categories of Personal Information</b>	<b>Examples of Personal Information Collected</b>
Identifiers.	A real name, alias, postal address, unique personal identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
California Customer Records.	A name, signature, Social Security number, or, address, telephone number, passport number, driver's license or state identification card number, education, employment, employment history, bank account number, or any other financial information, medical information, or health insurance information.
Protected classification characteristics under California or federal law.	Age, race, national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), information relating to same sex benefits, veteran or military status.
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.
Geolocation data.	Company trucks
Professional or employment-related information.	Current or past job history or performance evaluations.

**Monitoring:** We reserve the right to monitor the use of our premises, equipment, devices, computers, network, applications, software, and similar assets and resources. In the event such monitoring occurs, it may result in the collection of personal information about you. Some Wismettac facilities are equipped with surveillance equipment such as cameras and CCTV which may capture your image or information about

your movements, and which may be used to protect the safety of Wismettac's staff, visitors and property. This is not meant to suggest that all Personnel will in fact be monitored, but to alert you that when using Wismettac equipment and resources, you should not have any expectations of privacy with respect to your use of such equipment or resources. We will ensure that any personal information generated by this monitoring is treated in accordance with this Policy.

Wismettac obtains the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms or surveys you complete or services we provide you.
- Indirectly from you. For example, from observing your actions on our website or from information your computer or mobile device transmits when interacting with our website, among other things.
- Third parties. For example, staffing and recruiting agencies with whom we contract for services, consumer reporting agencies when we perform employee background screenings, and from our business contacts who may provide your information in connection with a survey response or service request.

## USE OF INFORMATION

When you apply for a position on our Career Portal, we use your personal information to evaluate a potential employment relationship with you and for other business purposes. If you submit your information to our talent network, we use that information to keep you informed about career opportunities with us. In particular, we use personal information to:

- Provide, maintain, and improve the Career Portal and personalize your experience;
- Assess your skills, qualifications, and suitability for the role;
- Communicate with you about the recruitment process;
- Verify your information and complete your reference and/or background checks (where applicable) if we offer you a position;
- Manage and improve our recruitment and hiring process more generally and enable other processing for legitimate business interests and internal uses that are reasonably aligned with the expectations of applicants;
- Cooperate with law enforcement investigations and comply with applicable laws, regulations, legal processes, and governmental requests;
- Send you technical notices, security alerts, support messages, and other transactional or relationship messages;
- Monitor and analyze trends, usage, and activities in connection with our Career Portal;
- Detect, investigate, and help prevent security incidents and other malicious, deceptive, fraudulent, or illegal activity and help protect the rights and property of Wismettac and others;
- Comply with our legal and financial obligations;
- Create de-identified, anonymized, or aggregated information; and
- Carry out any other purpose described to you at the time the information was collected.

If you are hired, we will process your personal information in connection with your employment or engagement, in particular for the following business purposes:

- *For entering into, execution of and termination of your employment or engagement, including the integration into our business and our organization, training, idea management, calculation and*

execution of company pension schemes, and as necessary for the performance of a contract or in order to take steps at your request prior to entering into a contract;

- *General HR and personnel administration*, including payroll and benefits, expense reimbursement, travel and time-keeping, administration of work time and value accounts, training and development, performance management, sickness and absence management, emergency contact, grievance and disciplinary procedures, equal opportunity monitoring, as necessary and appropriate to provide reasonable workplace accommodations, and for business continuity planning;
- *Personnel planning, assignment and development*, including considering your suitability for any of our current or future employment opportunities, succession planning, assigning you to project teams, know-how pools or other internal groups and to confirm your references, character and educational background;
- *Secondment, relocation and business travel purposes*, including working with local authorities or organizations, doctors, relocation agencies, travel agents, and other service providers as needed to facilitate the secondment, relocation, or business travel;
- *Strategic business planning and organizational purposes*, including planning, controlling, budgeting, benchmarking, and restructuring;
- *Marketing purposes*, including marketing photos, billboards, website content, videos, social media posts, research and development of new products and services, and other related marketing activities, for which we will only use personal data about you in creating this content with your consent;
- *Security purposes*, including maintaining and protecting our property, ensuring integrity and security of and controlling access to our premises, facilities, IT and communication systems, platforms, websites and other systems or facilities (including monitoring by camera or other means of surveillance), investigating, preventing and detecting security threats, fraud, theft or other criminal or malicious activities, and as necessary in order to protect the vital interests of Personnel or of another natural person such as during an emergency threatening the health or security of Personnel;
- *Legal documentation purposes*, to ensure compliance with legal documentation and document retention obligations (such as record keeping obligations);
- *Organizational compliance*, in particular monitoring and assessing compliance with our policies and standards;
- *Regulatory compliance*, ensuring compliance with our legal and regulatory obligations and exercising and enforcing our rights under applicable laws or regulations, such as laws relating to tax and commercial law matters, social matters, work place security, medical matters, sickness benefits, employee protection (such as working time, maternity leave, termination protection, minimum wage), works constitution, and other relevant laws;
- *For specific compliance purposes*, such as compliance screening or recording obligations (e.g. under antitrust laws, export laws, trade sanction and embargo laws, or to prevent white-collar or money laundering crimes). This may include the following measures: checks of your contact or identity data against applicable sanctioned-party lists and contacting you to confirm your identity in case of a potential match, reporting to or cooperation with requests or audits by national and international regulatory, enforcement or exchange bodies, conducting reference checks, background checks, public register checks, conflict checks, credit checks, criminal records checks (where applicable), and other due diligence as required under applicable law and regulations;

- *Disputes and enforcement of claims*, including supporting us in dealing with and solving disputes, complying with orders of courts, authorities, or other public bodies, enforcing our contractual agreements and to establish, exercise or defend legal claims; and
- *To enable solely internal uses* in a lawful manner that are reasonably aligned with expectations of Personnel based on our work relationship and that are compatible with the context in which the information was provided to Wismettac.

## DISCLOSURES OF INFORMATION

In the preceding 12 months, we have disclosed the following categories of personal information for business purposes to the following categories of recipients:

<i>Category of Personal Information</i>	<i>Categories of Recipients</i>
Identifiers.	Service providers, such as Benefits Administrators, Payroll Processors, Personnel Management Providers, Legal Service Providers, IT and Security Providers.
California Customer Records.	Benefits Administrators, Payroll Processors, Personnel Management Providers.
Protected classification characteristics under California or federal law.	Benefits Administrators, Payroll Processors, Personnel Management Providers.
Commercial information.	Legal service providers, IT and Security Service Providers.
Biometric information.	IT and Security Service Providers.
Internet or other electronic network activity.	IT and Security Service Providers.
Professional or employment-related information.	Benefits Administrators, Payroll Processors, Personnel Management Providers, Legal Service Providers, IT and Security Service Providers.
Inferences.	IT and Security Service Providers.

We do not use or disclose sensitive personal information for the purpose of inferring characteristics about you. We will not retain your personal information for longer than is reasonably necessary to carry out the purposes we disclose in this Policy.

## SALES AND SHARING OF PERSONAL INFORMATION

California law requires that we provide transparency about personal information we “sell” or “share.” “Sale,” for the purposes of the CCPA, broadly means scenarios in which we have disclosed personal information with partners in exchange for valuable consideration, while “sharing” means we have disclosed information to a third party for cross-context behavioral advertising. We do not “sell” your personal information. However, we do “share” your personal information by allowing our advertising partners to collect identifiers and internet or other electronic network activity via our services to show you ads that are targeted to your interests. We do not knowingly sell or share personal information about consumers under the age of 16.

We engage others to provide analytics services and serve advertisements across the web and in mobile apps. These entities may use cookies, web beacons, device identifiers, and other technologies to collect information about your use of our Career Portal and other websites and applications, including your IP address, web browser, mobile network information, pages viewed, time spent on pages or in mobile apps, links clicked, and conversion information. This information may be used by Wismettac and others to, among other things, analyze and track data, deliver advertising and content targeted to your interests on our Career Portal, and better understand your online activity. For more information about interest-based ads, or to opt out of having your web browsing information used for behavioral advertising purposes, please visit [www.aboutads.info/choices](http://www.aboutads.info/choices).

## **YOUR PRIVACY RIGHTS AND CHOICES**

Subject to certain limitations, you have the right to (1) request to know more about the categories and specific pieces of personal information we collect, use, and disclose, (2) request correction of your personal information, (3) request deletion of your personal information, (4) opt out of any “sales” or “sharing” of your personal information that may be occurring, and (5) not be discriminated against for exercising these rights. You may make these requests by calling (800) 457-8844 or sending an email to [hr@wismettacusa.com](mailto:hr@wismettacusa.com). We will verify your request by asking you to provide information related to your recent interactions with us.

If we receive your request from an authorized agent and they do not provide a valid power of attorney, we may ask the authorized agent to provide proof that you gave the agent signed permission to submit the request to exercise rights on your behalf. In the absence of a valid power of attorney, we may also require you to verify your own identity directly with us or confirm to us that you otherwise provided the authorized agent permission to submit the request. If you are an authorized agent seeking to make a request, please call (800) 457-8844.

## **CONTACT US**

If you have any questions about this Policy, please contact us at [hr@wismettacusa.com](mailto:hr@wismettacusa.com)