



**DATE:** January 1, 2023  
**TO:** Applicants and Employees  
**FROM:** Michael Rodriguez, VP-Human Resources  
**SUBJECT:** Privacy Policy - California Privacy Rights Act (CPRA) Effective January 1, 2023

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Please take notice that the Company collects certain information about you. For more information on the Company's policies, please refer to the Company's privacy policy

California's California Consumer Privacy Act ("CCPA") and California Privacy Rights Act ("CPRA") provide California applicants and employees with certain rights:

- Knowledge of information collected;
- Deletion of information collected;
- Opt-out of information collected;
- Opt-in of information collected;
- Correction of information collected;
- Go to court;
- Limit use of information collected;
- Not to be discriminated or retaliated against for exercising rights under the law.

**Where We Get Your Information From.** The Company collects information about you from the following sources: 1) you; 2) prior employers, references, recruiters, job-related social media platforms; 3) third-party sources of demographic information; 4) third-party companies, such as background check companies, drug testing facilities; and 5) claim administrators and investigators. Depending on the Company's interactions with you, we may or may not collect all of the information identified about you.

**The Personal and Sensitive Personal Information That We Are Collecting.** We are collecting the following information:

- Identifiers, such as name, government-issued identifier (e.g., Social Security number), and unique identifiers (e.g., employee ID);
- Personal information, such as real name, signature, SSN, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, passport number, federal identification authorizing work in the United States, access and/or passcodes, insurance policy number, education, employment, employment history, bank account number, other financial information, medical information, or health insurance information;

- Characteristics of protected classifications under California or federal law, such as age, marital status, gender, sex, race, color, disability, citizenship, primary language, immigration status, military/veteran status, disability, request for leave, and medical conditions;
- Commercial information, such as transaction information and purchase history (e.g., in connection with travel or other reimbursements);
- Internet or network activity information, such as browsing history and interactions with our online systems and websites and any personal information that you provide while accessing the Company's computer systems, such as personal credit card information and passwords;
- Geolocation data, such as device location from usage of the Company's devices;
- Biometric information related to access to the Company's secured access points;
- Audio, electronic, visual, and similar information;
- Professional or employment-related information, such as work history and prior employer;
- Non-public education information;
- Inferences drawn from any of the Personal and Sensitive Personal Information listed above to create a profile or summary about, for example, an individual's preferences and characteristics.

**How Your Personal and Sensitive Personal Information is Used.** We may use Personal and Sensitive Personal Information:

- To operate, manage, and maintain our business;
- For hiring, retention, and employment purposes;
- To otherwise accomplish our business purposes and objectives, including, for example:
  - Emergency services;
  - Conducting research, analytics, and data analysis;
  - Maintaining our facilities and infrastructure;
  - Quality and safety assurance measures;
  - Conducting risk and security controls and monitoring;
  - Protecting confidential and trade secret information;
  - Detecting and preventing fraud;
  - Performing identity verification;
  - Performing accounting, audit, and other internal functions, such as internal investigations;
  - Complying with the law, legal process, and internal policies;
    - Maintaining records;
    - Claims processing;
    - Responding to legal requests for information and subpoenas; and
    - Exercising and defending legal claims.
- Any other purposes authorized by the California Privacy Protection Agency, California or Federal law.

We may or may not have used Personal and Sensitive Personal Information about you for each of the above purposes.

**Sharing of Personal Information.** We only share your information with the following third-party entities:

- Payroll and Benefit Administrators who require the information to manage our programs
- State and Federal organizations that are legally entitled to your information

**Selling of Personal Information.** The Company does not sell your personal information.

**Data Retention.** The Company retains the information it receives about you in accordance to the requirements under state and federal law.

**For Inquiries and/or to Submit Requests for Information, Deletion or Correction.**

Please contact Human Resources at (1) (323) 582-9977 x 93095, (2) [hr@overhillfarms.com](mailto:hr@overhillfarms.com), (3) 2727 E. Vernon Ave, Vernon CA 90058 for inquiries about the Company's policy, or to submit your requests for information, deletion or correction.