

# Employee Privacy Policy

Last Updated: August 27, 2024

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This Employee Privacy Policy (“Policy”) describes how Ridge Vineyards, Inc. (“Ridge Vineyards,” “we,” “us,” or “our”) collects, uses, discloses, and retains personal information about our current and former employees, independent contractors, and job applicants. This Policy also describes the rights that you may have regarding our processing of your personal information under applicable local law.

**California Residents:** This Policy describes how we collect, use, disclose, sell, share, and retain your personal information. For additional information relating to your rights and our processing of your personal information, please navigate to the [Additional Disclosures Under Applicable Law](#) Section below.

You may download a printable copy of this Policy (PDF): [here](#).

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## Categories of Personal Information We Collect About You

In the course of your employment relationship or engagement with Ridge Vineyards, including during the recruitment process, we may collect the following categories of personal information about you and your emergency contacts, dependents, and beneficiaries, directly from you, from third parties, and automatically through your use of Ridge Vineyards IT systems, networks, and resources.

- **Identifiers**, such as your real name, alias, postal address, telephone numbers, employee identification number or other unique personal identifier, online identifier, IP address, email address, usernames and passwords, social security number, driver’s license number, passport number, or other similar identifiers.
- **Protected classifications**, such as your age, race, gender, color, national origin, ancestry, physical or mental disability, marital status, religion, and sexual orientation.
- **Compensation information**, such as your salary, pay group, pay type, bank account information, and time off balances.
- **Audio, electronic, visual, thermal or similar information**, such as professional photographs, photographs taken in the workplace, audio and/or video recordings made in the workplace with various recording devices as well as on Microsoft Teams, Zoom and similar systems as well as CCTV footage.

- **Professional or employment-related information**, such as your employer, current position, job title, employment status and type, emergency contact and dependent information, performance, attendance, disciplinary records, experience and expertise, professional contact information, location of employment, working hours, work history, length of service, professional biography, travel and expense data, skills, interests, professional memberships, compliance/training records, references, and any other information provided in your resume or CV.
- **Education information**, such as information about where you attended school and your academic history.
- **Geolocation data**, such as the general and precise physical location of your device.
- **Internet or other electronic network activity**, such as your browser type and operating system, IP address, browsing history, clickstream data, search history, and information regarding your interaction with Ridge Vineyards IT systems, networks, and resources, and the Ridge Vineyards careers page, including access logs and other activity information, electronic communications and files, and network connections.
- **Inferences**, such as inferences drawn to create a profile reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, or aptitudes.
- **Sensitive personal information**, as defined under applicable local law, such as certain characteristics of protected classifications, social security number, account login credentials and passwords, driver's license number, passport number, precise geolocation, and information regarding your physical or mental health.

Information We Collect Directly From You. We collect personal information about you and your emergency contacts, beneficiaries, and dependents, directly from you in the course of your employment or engagement with Ridge Vineyards, and in the online resume submission process.

Information We Collect From Other Sources. We may collect personal information about you from third parties, such as your former employer or references, background check providers or credit reference agencies, higher education institutions, government entities, public databases, social media platforms, providers of demographic data, professional organizations, and service providers and third parties that help us locate, screen, and onboard individuals for hiring purposes, such as recruiting agencies, as well as entities that help us train and develop our employees. We may also collect information about your performance and conduct from other employees or business contacts you work with who may provide feedback about you.

Information We Collect Automatically. We automatically collect personal information when you access Ridge Vineyards IT systems, mobile applications, networks, and resources, or the Ridge Vineyards careers page, such as the information described above as "Internet or other electronic network activity."

## **How We Use Your Information**

We use the categories of personal information described above for the following business purposes:

- To manage your employment relationship with us and to communicate with you and respond to your inquiries.
- To determine eligibility for hiring, including the verification of references and qualifications, and where permitted by law, administering background checks.
- To evaluate your candidacy for a job posting and make decisions about your recruitment and the terms on which you may work with us.
- To administer your salary, payroll and benefits, such as compensation, payroll, expense reimbursement, or benefits enrollments, or providing you with vendors for the purpose of administering benefits.
- To assess your performance and support you in career development, such as performance management, career development, training, and continued employment.
- To provide activities relating to our business operations in the context of your role, such as managing vacation, leave, and other absences.
- For IT identification and authentication purposes.
- To send periodic updates to you covering employment opportunities relevant to you, company news, and other information.
- For business administration purposes, including record keeping obligations, accounting, auditing, financial and business planning purposes, understanding employee retention and attrition rates, social activities and employee engagement (where applicable) and arranging systems and building access.
- To review work performance, and where appropriate, conduct disciplinary action or termination.
- To comply with our legal obligations or exercise or defend our rights or the rights of a third party, including complying with law enforcement or government authority requests and participating in compliance audits.
- Where we believe necessary to investigate, prevent, or take action regarding suspected or actual illegal activities, fraud, situations involving potential threats to the safety of any person or to otherwise enforce this Policy.
- We may also deidentify or anonymize your data in such a way that you may not reasonably be re-identified by us or another party, and we may use this deidentified data for any purpose permitted under applicable law. To the extent we deidentify any data originally based on personal information, we will maintain and use such data in deidentified form and will not attempt to reidentify the data.

### **How We Disclose the Information We Collect**

We may disclose each of the categories of personal information described above in order to fulfill our employment obligations to you and for the business purposes described above as follows:

- **Related Entities.** We may disclose the personal information we collect about you to our parent and affiliated entities as appropriate for the purposes described in this Policy, including to fulfill

business-related purposes, such as for payroll, administration and provision of benefits, IT infrastructure, etc.

- **Service Providers.** We may disclose the personal information we collect about you to service providers, contractors, and agents who perform functions and business operations on our behalf, for the purposes set out above. For example, these service providers provide us with services relating to hiring, payroll, benefit and wellness, travel, training and development, web hosting, research and data analytics, infrastructure, technology, email and other communication, fraud and security, legal, and other business support services.
- **Third Parties.** We may disclose the personal information we collect about you to our third party business partners, such as benchmarking companies for purposes that help us with benchmarking the compensation afforded to our employees
- **Business Transfers.** If (i) we or our affiliates are or may be acquired by, merged with, or invested in by another company, or (ii) if any of our assets are or may be transferred to another company, whether as part of a bankruptcy or insolvency proceeding or otherwise, we may transfer the information we have collected about you to the other company. As part of the business transfer process, we may disclose certain of your information to lenders, auditors, and third party advisors, including attorneys and consultants.
- **In Response to Legal Process.** We may disclose your personal information to comply with the law, a judicial proceeding, court order, or other legal process, such as in response to a court order or a subpoena.
- **To Protect Us and Others.** We disclose your personal information where we believe it is appropriate to do so to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of this Policy, or as evidence in litigation in which we are involved.
- **Aggregate and De-Identified Information.** We may share aggregate, anonymized, or de-identified information about you for any purpose permitted under applicable local law.
- **Consent.** We may also disclose your personal information with your consent, where permitted by applicable local law.

### **Additional Disclosures Under Applicable Law**

You may have certain rights regarding our processing of your personal information under applicable local law, including if you are a California resident. If our processing of your personal information is governed by such laws, the following provisions apply to our processing of your personal information. These provisions supplement the other sections of this Policy.

We may “sell” your personal information (as that term is defined under applicable local law) in limited contexts, including to benchmarking companies that help us with benchmarking the compensation afforded to our employees. These benchmarking companies may combine the personal information we provide to them, including your salary, title, and location, with other personal information maintained by the company. Under California law, this may be considered as a “sale” of personal information. We do not “share” your personal information for cross-contextual behavioral advertising purposes (as those terms are defined under applicable local law).

Below is a chart that describes the categories of third parties to whom we may disclose for a business purpose, or “sell,” your personal information.

<b>Category of personal information</b>	<b>Categories of third parties to whom we may disclose personal information for a business purpose</b>	<b>Categories of third parties to whom we may “sell” or “share” personal information</b>
<b>Identifiers</b>	<ul style="list-style-type: none"> <li>• Related entities</li> <li>• Service providers</li> <li>• Government entities</li> </ul>	None.
<b>Protected classifications</b>	<ul style="list-style-type: none"> <li>• Related entities</li> <li>• Service providers</li> <li>• Government entities</li> </ul>	Benchmarking providers
<b>Compensation information</b>	<ul style="list-style-type: none"> <li>• Related entities</li> <li>• Service providers</li> <li>• Government entities</li> </ul>	Benchmarking providers
<b>Audio, electronic, visual, thermal, or similar information</b>	<ul style="list-style-type: none"> <li>• Related entities</li> <li>• Service providers</li> <li>• Government entities</li> </ul>	None.
<b>Professional or employment-related information</b>	<ul style="list-style-type: none"> <li>• Related entities</li> <li>• Service providers</li> <li>• Government entities</li> </ul>	Benchmarking providers
<b>Education information</b>	<ul style="list-style-type: none"> <li>• Related entities</li> <li>• Service providers</li> <li>• Government entities</li> </ul>	None.
<b>Geolocation data</b>	<ul style="list-style-type: none"> <li>• Related entities</li> <li>• Service providers</li> <li>• Government entities</li> </ul>	Benchmarking providers
<b>Internet or other electronic network activity</b>	<ul style="list-style-type: none"> <li>• Related entities</li> <li>• Service providers</li> <li>• Government entities</li> </ul>	None.
<b>Inferences</b>	<ul style="list-style-type: none"> <li>• Related entities</li> <li>• Service providers</li> <li>• Government entities</li> </ul>	None.
<b>Sensitive personal information</b>	<ul style="list-style-type: none"> <li>• Related entities</li> <li>• Service providers</li> <li>• Government entities</li> </ul>	None.

We do not use or disclose your sensitive personal information for purposes other than permitted under applicable local law.

## ***Data Retention***

Your personal information will be held for only so long as it is necessary for the purpose for which it was originally collected, including during the duration of your employment relationship with us, and in accordance with applicable local law. We will retain your personal information for the period necessary to fulfill the purposes outlined in this Policy. When assessing retention periods, we first examine whether it is necessary to retain the personal information collected and, if retention is required, work to retain the personal information for the shortest possible period permissible under applicable law.

## ***Your Privacy Choices and Rights***

You may have certain rights regarding our processing of your personal information under applicable local law, including if you are a California resident. Depending on the jurisdiction in which you live, these rights may include the:

- Right to request access and a copy of your personal information and information relating to how it is processed;
- Right to request deletion of your personal information;
- Right to request the correction or update of the personal information we hold about you;
- Right to opt-out of “sales” of your personal information and “sharing” of your personal information for cross-context behavioral advertising purposes (as these terms are defined under applicable law)
- Right to limit our use of your sensitive personal information;
- Right to opt-out of certain profiling activities;
- Right to not be unlawfully discriminated against for exercising your rights.

These rights may be limited or denied in some circumstances. For example, we may retain your personal information where required or permitted by applicable law.

To exercise your rights under applicable local law or if you are an authorized agent submitting a request on behalf of an individual under applicable local law, you may contact us toll free at 844-441-9869 (pin 617011) or submit a request through our [WEBFORM](#). When you or your authorized agent are exercising your privacy rights, we require that you explain your relationship with us, specify your request type, and provide your name, email address, country, home address, the details of your request, and your date of birth. We use this information to identify responsive records, and in certain cases, to verify your identity. Authorized agents must also provide a copy of the signed permission authorizing the agent to submit requests on your behalf. We will not discriminate against you if you choose to exercise your privacy rights.

## ***Security of My Information***

We implement physical, technical, and organizational security measures designed to safeguard personal information. These measures are aimed to protect the personal information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction. Please be aware that despite our efforts, no data security measures can guarantee security.

## **Contact Us**

All comments, questions, concerns or complaints regarding your personal information or our privacy practices should be sent to [hr@ridgewine.com](mailto:hr@ridgewine.com).

## **Changes to this Policy**

This Policy is current as of the Last Updated date set forth above. We may change this Policy from time to time, so please be sure to check back periodically. If we make any changes to this Policy that materially affect our practices with regard to the information we have previously collected about you, we will highlight the change on our website and intranet, and in some situations, send you an email.