

## Job Applicant and Other Non-Employee HR Privacy Policy

Effective Date: November 1, 2023

[Canada Applicant Data Privacy Policy](#)

[Hot-N-Ready México - Aviso de privacidad para candidatos](#)

This privacy policy describes the processing of California residents' personal information in relation to non-employee contexts, such as in relation to processing a job application that you submit and in other HR contexts described below. In this privacy policy, "we", "us", "our", and "Company" are used to refer to the companies in the Ilitch family of companies that do business in California, such as Little Caesar Enterprises, Inc., Blueline Foodservice Distribution, Inc. and certain of their affiliated and related entities. We are providing this privacy policy to you to meet our obligations under California's privacy law, the California Consumer Privacy Act ("CCPA").

**This privacy policy only applies to certain, non-employment HR contexts, such as pre-employment (when you apply for a job on our [Careers](#) page or in person in California), if you are a current or former independent contractor, or if you are listed as an emergency contact, beneficiary, or dependent for a Company employee or former employee, or if you are a beneficiary or dependent of a Company employee or former employee, and elsewhere it is posted or linked. It does not apply to our data practices outside of those contexts. Current or former employees that are California residents can access the CA employee privacy policy by logging into the employee portal or by calling us at 1-833-803-1077.**

If you interact with us in a non-HR context, such as when you visit the consumer-facing aspects of our [littlecaesars.com](https://littlecaesars.com) website or order pizza on our mobile app, the posted privacy policy (for example, <https://littlecaesars.com/en-us/legal/privacy-policy>) will apply, and describes our data practices in that context. In the event of a conflict between any other applicable Company policy, statement or notice and this privacy policy, this privacy policy will prevail as to personal information of California residents collected in the above HR contexts, unless stated otherwise.

- Section 1 of this privacy policy provides notice of our data practices, including our collection, use, and disclosure of California residents' personal information in the above HR contexts.
- Section 2 of this privacy policy provides information regarding California residents' rights under the CCPA and how you may exercise them.
- Sections 3-5 include other information required by the CCPA or information that we believe is helpful to provide to you as part of this privacy policy.

### 1. NOTICE OF DATA PRACTICES

As required by the CCPA, this privacy policy is designed to provide you with notice of our recent, historical data practices over the prior 12 months (from the Effective Date listed at the top of this privacy policy). This privacy policy will be updated at least annually.

This privacy policy also applies to our current data practices such that it is also meant to provide you with notice of personal information we collect and the purposes for which we process personal information, among other things required by the CCPA. For any new or substantially different processing activities that are not described in this privacy policy, we will notify you as required by the CCPA, including by either notifying you at the time of collecting personal information, or by updating this privacy policy earlier than required.

**(a) PI Collection, Retention, and Disclosures**

The first column in the table below lists the categories of personal information we collect, while the second column provides examples of types of personal information within such category. We collect the categories of personal information listed in the below table. We disclose or otherwise make available personal information to our vendors, affiliates, and related entities, and other parties for the purposes as more fully set forth in the table below.

Category of PI	Examples of types of PI within category	Categories of Recipients
1. Identifiers and contact information	Name, alias, postal address, phone number, email address, driver’s license, social security number, employee ID, IP address and other online IDs.	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• General IT, software, and other business vendors</li> <li>• HR system and software vendors</li> <li>• Non-software HR vendors, such as background check vendors</li> <li>• Payroll and benefits vendors and providers</li> <li>• Insurance providers and brokers</li> <li>• Affiliates and related entities</li> <li>• Governmental entities (for example, in relation to our obligations to determine employment eligibility and responding to requests pursuant to legal or regulatory process)</li> </ul> <p><b>Sale/Share:</b> N/A</p>
2. Personal Records	Some PI included in this category may overlap with other categories. Examples include name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, education, employment, or employment history.	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• General IT, software, and other business vendors</li> <li>• HR system and software vendors</li> <li>• Non-software HR vendors, such as background check vendors</li> <li>• Payroll and benefits vendors and providers</li> <li>• Insurance providers and brokers</li> <li>• Affiliates and related entities</li> <li>• Governmental entities (for example, in relation to our obligations to determine</li> </ul>

Category of PI	Examples of types of PI within category	Categories of Recipients
		<p>employment eligibility and responding to requests pursuant to legal or regulatory process)</p> <p><b>Sale/Share:</b> N/A</p>
<p>3. Personal Characteristics or Traits</p>	<p>In some circumstances, we may collect PI that is considered protected under U.S. or California law, such as age, gender, nationality, race or information related to medical conditions.</p>	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• General IT, software, and other business vendors</li> <li>• HR system and software vendors</li> <li>• Non-software HR vendors, such as background check vendors</li> <li>• Payroll and benefits vendors and providers</li> <li>• Insurance providers and brokers</li> <li>• Affiliates and related entities</li> <li>• Governmental entities (for example, in relation to our obligations to determine employment eligibility, responding to requests pursuant to legal or regulatory process)</li> </ul> <p><b>Sale/Share:</b> N/A</p>
<p>4. Commercial Information</p>	<p>Records of products or services purchased or obtained in the HR context, such as benefits you have signed up for.</p>	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• General IT, software, and other business vendors</li> <li>• HR system and software vendors</li> <li>• Non-software HR vendors, such as background check vendors</li> <li>• Payroll and benefits vendors and providers</li> <li>• Insurance providers and brokers</li> <li>• Governmental entities (for example, in relation to our obligations to determine employment eligibility, responding to requests pursuant to legal or regulatory process)</li> <li>• Affiliates and related entities</li> </ul> <p><b>Sale/Share:</b> N/A</p>
<p>5. Biometric Information</p>		<p>Not collected</p>
<p>6. Internet Usage Information</p>	<p>When you use our online systems or otherwise interact with us online, we may collect</p>	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• General IT, software, and other business vendors</li> </ul>

Category of PI	Examples of types of PI within category	Categories of Recipients
	browsing history, search history, and other information regarding your interaction with our internal systems and third-party applications, or other sites, applications, or content.	<ul style="list-style-type: none"> <li>• HR system and software vendors</li> <li>• Affiliates and related entities</li> <li>• Governmental entities (for example, in relation to our obligations to determine employment eligibility, responding to requests pursuant to legal or regulatory process)</li> </ul> <p><b>Sale/Share:</b> N/A</p>
7. Geolocation Data	If you use our systems or interact with us online, we may gain access to the approximate location of the device or equipment you are using, or the location from which you are accessing our systems.	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• General IT, software, and other business vendors</li> <li>• HR system and software vendors</li> <li>• Affiliates and related entities</li> <li>• Governmental entities (for example, in relation to our obligations to determine employment eligibility, responding to requests pursuant to legal or regulatory process)</li> </ul> <p><b>Sale/Share:</b> N/A</p>
8. Audio, electronic, visual, thermal, olfactory, or similar Information	Examples of this category may include security video if you apply in person.	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• General IT, software, and other business vendors</li> <li>• HR system and software vendors</li> <li>• Affiliates and related entities; and/or</li> <li>• Governmental entities (for example, in relation to our obligations to determine employment eligibility, responding to requests pursuant to legal or regulatory process)</li> </ul> <p><b>Sale/Share:</b> N/A</p>
9. Professional or Employment Information	For example, if you are an applicant, your current and prior jobs and education. If you are an employee, examples include your status of employment, title, performance reviews, store location, tenure.	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• General IT, software, and other business vendors</li> <li>• HR system and software vendors</li> <li>• Non-software HR vendors, such as background check vendors</li> <li>• Payroll and benefits vendors and providers</li> <li>• Insurance providers and brokers</li> <li>• Affiliates and related entities; and/or</li> <li>• Governmental entities (for example, in relation to our obligations to determine</li> </ul>

Category of PI	Examples of types of PI within category	Categories of Recipients
		<p>employment eligibility, responding to requests pursuant to legal or regulatory process)</p> <p><b>Sale/Share:</b> N/A</p>
10. Non-public Education Records	<p>For example, official grades, transcripts, class lists, or disciplinary records from your educational institution.</p>	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• General IT, software, and other business vendors</li> <li>• HR system and software vendors</li> <li>• Non-software HR vendors, such as background check vendors</li> <li>• Governmental entities (for example, in relation to our obligations to determine employment eligibility, responding to requests pursuant to legal or regulatory process)</li> <li>• Affiliates and related entities</li> </ul> <p><b>Sale/Share:</b> N/A</p>
11. Inferences from PI Collected	<p>We may draw inferences from other information we collect about you.</p>	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• General IT, software, and other business vendors</li> <li>• HR system and software vendors</li> <li>• Payroll and benefits vendors and providers</li> <li>• Insurance providers and brokers</li> <li>• Affiliates and related entities</li> <li>• Governmental entities (for example, in relation to our obligations to determine employment eligibility, responding to requests pursuant to legal or regulatory process)</li> </ul> <p><b>Sale/Share:</b> N/A</p>
12. Sensitive PI	<p>We collect the following categories of Sensitive PI: (a) Social Security, driver's license, state identification card, or passport number; (b) account log-in in combination with any required security or access code, password, or credentials allowing access to an account.</p>	<p><b>Disclosures for Business Purposes:</b></p> <ul style="list-style-type: none"> <li>• General IT, software, and other business vendors</li> <li>• HR system and software vendors</li> <li>• Affiliates and related entities</li> <li>• Governmental entities (making requests pursuant to legal or regulatory process)</li> </ul> <p><b>Sale/Share:</b> N/A</p>

**Scope of PI:** There may be additional information that we collect that meets the definition of personal information under the CCPA but is not reflected by a category above, in which case we will treat it as personal information as required but will not include it when we describe our practices by category of personal information.

**Retention Details:** The CCPA requires us to either disclose length of time we intend to retain each category of personal information listed above, or if that is not possible, the criteria used to determine the period of time it will be retained. Because there are so many different types of personal information in each category, and so many purposes and use cases for different data, we have determined that it is not possible to disclose in a clear manner how long we intend to retain each category. The criteria for determining the retention period are whether we have a legitimate purpose for the retention consistent with the collection purposes and applicable law, and/or a legal obligation or right to retain the data. For instance, we may maintain business records for so long as relevant to our business, and/or may have a legal obligation to hold PI for so long as potentially relevant to prospective or actual litigation or government investigation.

**(b) Sources of PI**

We may collect your PI from a number of sources, including:

- You, such as when you apply for a position or provide us with information otherwise
- Your devices
- From third parties (e.g., background check and vendors, references, job agencies), including third-party online services, and from public sources of data
- Our affiliates and related entities
- If you are an emergency contact, beneficiary, or dependent, from your family member or friend who is employed by us

**(c) Use of Personal Information**

Generally, we collect, retain, use, and disclose your personal information for HR business purposes and as otherwise related to the operation of our business. Our HR business purposes include the following:

- Recruitment
- Employee Intake/ Onboarding/ Offboarding
- Payroll, Reimbursements, and Timekeeping
- Benefits
- Employee activation initiatives and communications
- Training programs and education
- HR IT Systems and Security
- Employee and Performance Management
- Health & Safety/Occupational Health
- Security (including electronic and of premises)
- Other purposes disclosed at the time you provide your information or done at your direction

Additional business purposes that apply to our business more broadly, and that may apply in the HR context, include:

- To assignees or potential assignees as part of an acquisition, merger, asset sale, or other transaction where another party assumes control over all or part of our business;
- Compliance with legal obligations or legal process;
- Where we believe we need to in order to investigate, prevent or take action if we think someone might be using information for illegal activities, fraud, or in ways that may threaten someone's safety or violate our policies or legal obligations;
- Debugging, performing services, quality assurance, and research and development;
- Communicating with applicants regarding employment opportunities, including notifying applicants of open positions; and
- Otherwise to the extent not prohibited by applicable law.

The italicized business purposes in the list are those that are specifically defined in the CCPA. Our vendors may also use your PI for business purposes and may engage their own service providers or subcontractors to enable them to perform services for us.

## **2. YOUR HR DATA RIGHTS AND HOW TO EXERCISE THEM**

Company provides California residents the privacy rights described in this section, pursuant to our obligations under the CCPA. To exercise your privacy rights, or, if you are an authorized agent of another exercising privacy rights on behalf of someone else, you can submit a request by either:

- Calling us at 1-833-803-1077 and asking to be directed to the Legal Department
- Visiting our [webform](#)

Please respond to any follow-up inquiries we make, including in relation to the request verification process that we describe further below. Please be aware that we do not accept or process requests through other means (e.g., via fax, chats, social media, etc.).

### **(a) Right to Know/Access**

You can make "right to know" (also known as "access") requests, as described below, up to twice in a 12-month period.

#### **(1) Categories of Personal Information**

You have the right to request that we share certain information with you about our collection, use and disclosure of your PI over the 12-month period prior to the request date. You can request that we disclose to you: (1) the categories of PI we collected about you; (2) the categories of sources for the PI; (3) our business or commercial purpose for collecting or selling that PI (i.e., if we have, in fact, sold PI); (4) the categories of third parties with whom we shared that PI; (5) a list of the categories of PI disclosed for a business purpose in the prior 12 months and, for each, the categories of recipients, or that no disclosure occurred; and (6) a list of the categories of PI sold about you in the prior 12 months and, for each, the categories of recipients, or that no sale occurred.

## (2) Specific Pieces

You have the right to request a transportable copy of the specific pieces of personal information we collected about you in the 12-month period preceding your request. Please note that personal information is retained by us for various time periods, so there may be certain information that we have collected about you that we do not even retain for 12 months (and thus, it would not be able to be included in our response to you).

### (b) Right to Limit Sensitive PI Processing

Certain personal information qualifies as “sensitive” under CCPA, which we refer to in this privacy policy as “Sensitive PI”. You have the right to direct businesses to limit their use and disclosure of Sensitive PI if we use or disclose it beyond certain internal business purposes. We do not believe we use or disclose Sensitive PI beyond such internal business purposes, and therefore, this does not apply to our processing of Sensitive PI.

### (c) Do Not Sell / Share

You have the right to opt-out of the “sale” and “sharing” of your personal information, which are defined in the CCPA in ways that are different from their normal meanings as you may understand them. “Sale” of personal information includes “making available” of personal information to a third party, and “sharing” of personal information includes the “making available” of personal information to a third party for targeted advertising that is served based on an individual’s activity across different websites, applications, or services (defined in the CCPA as “cross-context behavioral advertising” and sometimes referred to as “interest-based advertising”). Neither concept requires money to be exchanged.

“Sales” and “sharing” of personal information may occur when third party operators of cookies and other tracking technologies (“**Cookie Operators**”) collect information on our websites that meet the definition of personal information. We understand that giving access to personal information on our websites to certain Cookie Operators could be deemed a “sale” and/or “sharing” under the CCPA. Therefore, we will treat such personal information (e.g., cookie ID, IP address, and other online IDs and internet or other electronic activity information) collected by Cookie Operators as such, except in circumstances where they are able to act as “service providers”, which are vendors that agree to process personal information pursuant to limited purposes.

We have disabled the cookies and other tracking technologies on our [Careers](#) page that may implicate “sale” or “sharing.” Therefore, we do not “sell” or “share” your personal information in the HR contexts described in this privacy policy.

Our webpages that you may come from that link to, or that you navigate to after visiting, our Careers page may have cookies and other tracking technologies enabled which implicate “sale” and “sharing.” Please visit the applicable privacy policy (for example, <https://littlecaesars.com/en-us/legal/privacy-policy>) and choice mechanism (for example, a cookie/consent management platform), as applicable, on

such webpages or websites for more information on how to opt out of “sale” and/or “sharing”, to the extent applicable.

The CCPA also requires us to state that we do not knowingly Sell the PI of Consumers under 16.

We may disclose your PI for the following purposes, which are not a “sale” or “sharing”: (i) if you direct us to disclose PI; (ii) to comply with a Consumer rights request you submit to us; (iii) disclosures amongst the entities that constitute Company as defined above, or as part of a Corporate Transaction; and (iv) as otherwise required or permitted by applicable law.

**(d) Opt-Out Preference Signals (also known as Global Privacy Control or GPC)**

The CCPA requires businesses to process opt-out preference signals (“OOPS”), which are signals sent by a platform, technology, or mechanism, enabled by individuals on their devices or browsers that communicates the individual’s choice to opt-out of the “sale” and “sharing” of personal information. The opt-out preference signal is also known as GPC. To use an OOPS/GPC, you can download an internet browser or a plugin to use on your current internet browser and follow the settings to enable the OOPS/GPC. As stated above, however, we have disabled cookies and other tracking technologies that may implicate “sale” or “sharing” on our Careers page.

**(e) Right to Delete**

You have the right to request that we delete personal information that we collected directly from you. However, we may have retention rights or obligations that apply, such as for legal, security, or internal business purposes such as maintaining business records, which we will take into consideration when processing your request.

**(f) Correct Your Personal Information**

You have the right to request that we correct inaccuracies that you find in your personal information maintained by Company. Your request to correct is subject to our verification (discussed below) and the CCPA’s response standards.

**(g) Automated Decision Making/Profiling**

We may engage in processing that constitutes automated decision-making or profiling under the CCPA. However, as of the Effective Date, the definitions of these concepts, and any associated opt-out and access rights have not been added to the updated CCPA and finalized.

**(h) Non-Discrimination / No Retaliation**

We will not discriminate or retaliate against you in a manner prohibited by the CCPA for your exercise of your privacy rights.

### **3. VERIFYING YOUR REQUESTS, AGENT REQUESTS, AND OUR RESPONSES**

#### **(a) Request Verification Process**

As required by the CCPA, when you make a request, we will verify that you are the person you say you are, or, if you are seeking information on behalf of another person, that you are authorized to make the request on their behalf. In addition, we will compare the information you have provided to ensure that we maintain personal information about you in our systems. We may ask initially that you provide certain verifying information, such as the company that you applied to, first and last name, mailing address, phone number and/or email address (we may also require that you prove that you have access to the email address which you submitted when you applied). We will review the information provided as part of your request and may ask you to provide additional information via e-mail or other means as part of this verification process. We will not fulfill your Right to Know (Categories), Right to Know (Specific Pieces), Right to Delete, or Right to Correction request unless you have provided sufficient information for us to reasonably verify you are the Consumer about whom we collected PI.

The verification standards we are required to apply for each type of request vary:

We verify your categories requests and certain deletion and correction requests (e.g., those that are less sensitive in nature) to a reasonable degree of certainty, which may include matching at least two data points provided by you with data points maintained by us, which we have determined to be reliable for the purpose of verifying you. For certain deletion and correction requests (such as those that relate to personal information that is more sensitive in nature) and for specific pieces requests, we apply a verification standard of reasonably high degree of certainty. This standard includes matching at least three data points provided by you with data points maintained by us, which we have determined to be reliable for the purpose of verifying you, and may include obtaining a signed declaration from you, under penalty of perjury, that you are the individual whose personal information is the subject of the request.

If we cannot verify you in respect of a certain requests, such as if you do not provide the requested information, we will still take certain action as required by the CCPA. For example:

- If we cannot verify your deletion request, we will refer you to this privacy policy for a general description of our data practices.
- If we cannot verify your specific pieces request, we will treat it as a categories request.

#### **(b) Agent Requests**

You may use an authorized agent to make a request for you, subject to our verification of (i) the agent, (ii) the agent's authority to submit requests on your behalf, and (iii) of you. Your agent may submit a request through one of the methods listed above. Once your agent's authority is confirmed, they may exercise rights on your behalf subject to the agency requirements of applicable U.S. Privacy Laws.

### **(c) Our Responses**

Some personal information that we maintain is insufficiently specific for us to be able to associate it with an individual (e.g., clickstream data tied only to a pseudonymous browser ID). We do not include that personal information in response to those requests. If we cannot comply with a request, we will explain the reasons in our response.

We will make commercially reasonable efforts to identify personal information that we maintain to respond to your requests. In some cases, particularly with voluminous and/or typically irrelevant data, we may suggest you receive the most recent or a summary of your PI and give you the opportunity to elect whether you want the rest. We reserve the right to direct you to where you may access and copy responsive PI yourself. We will typically not charge a fee to fully respond to your requests; provided, however, that we may charge a reasonable fee, or refuse to act upon a request, if your request is excessive, repetitive, unfounded, or overly burdensome. If we determine that the request warrants a fee, or that we may refuse it, we will give you notice explaining why we made that decision. You will be provided a cost estimate and the opportunity to accept such fees before we will charge you for responding to your request.

### **4. OUR RIGHTS AND THE RIGHTS OF OTHERS**

We may collect, use and disclose your PI as required or permitted by applicable law and this may override your rights and our obligations under the CCPA and as otherwise set forth in this privacy policy. In addition, we are not required to honor your requests to the extent that doing so would infringe upon our or another person's or party's rights or conflict with applicable law.

### **5. CONTACT US**

If you have any questions about this privacy policy or practices described in it, you should contact us in the following ways: Postal Mail: 2125 Woodward Ave, Detroit, MI 48201, Attn: HR/Legal; By e-mail [here](#).

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### **Canada Applicant Data Privacy Policy**

If you are a resident in Canada, or applying for a position in Canada or for a position offered by one of our companies located in Canada, this privacy policy applies to you. In this privacy policy, "we", "us", "our", and "Company" are used to refer to the companies in the Ilitch family of companies that do business in Canada, such as Little Caesar Enterprises, Inc., Blue Line Distribution, Inc., and certain of their affiliated and related entities. We are providing this privacy policy to you to meet our obligations under applicable Canadian privacy law.

This privacy policy applies to our current data practices and is meant to inform you of the types of personal information we may collect from you, the purposes for which we collect, use, disclose or communicate this information, the means through which such collection is affected, and of the rights you may have under applicable law. For any new or substantially different processing activities that are

not described in this privacy policy, we will notify you as required by applicable law, and, to the extent required by applicable law, obtain your renewed consent to such processing activities.

Unless otherwise allowed by the laws applicable in your province or territory of residence, we will only collect, use, or communicate your personal information with your consent. To the extent required under applicable law, we may ask you to confirm in writing that you have received, read and understood this policy, and that you consent to the collection, use and communication of your personal information in the manner described in this policy. Please note that, in certain cases, we may be unable to process your application for employment if you refuse to disclose certain personal information.

Your personal information may be communicated outside of your province or territory of residence: such communications will only be made in full compliance with all the requirements of applicable privacy laws.

Please read this policy carefully as it describes how we collect, use, retain, disclose, and otherwise process your personal information, and the rights you have under Canadian law as to your personal information. **This privacy policy does not apply to our data practices outside of the applicant context listed below. The Canadian privacy policy that applies to personal information collected in non-employment HR contexts is provided separately and can be found [here](#).**

**If you interact with us in a non-HR context, such as when you visit any of our brand websites in Canada or engage with any of our brands through a mobile app in Canada, the posted privacy policy for that brand will apply.**

In the event of a conflict between any other Company policy, statement or notice and this privacy policy, this privacy policy will prevail as to personal information collected in the employment application context, unless stated otherwise.

## **1. NOTICE OF DATA PRACTICES**

This privacy policy also applies to our current data practices such that it is also meant to provide you with notice of personal information we collect and the purposes for which we process personal information. For any new or substantially different processing activities that are not described in this privacy policy, we will notify you or obtain your consent as required by applicable law, including by either notifying you at the time of collecting personal information, or by updating this privacy policy.

### **(a) Collection of Personal Information**

We collect the following information for the purpose of assessing your eligibility for employment and, where applicable, establishing your employment relationship with us:

- Information about your qualifications, including employment history, information from your resumé and covering letter, education, reference letters, interview notes;
- Identification information, including name, home contact information, and, where applicable photograph or identification document;

- Information about your eligibility for employment, including authorization to work in Canada, ability to enter the United States and Mexico, criminal record check and reference checks (where required for the position and in accordance with applicable law);
- Driver's licence (if you will be driving as part of your employment, or to identify you) and provincial identification card (to identify you);
- Motor vehicle record (if you are applying to a position as a driver);
- Pre-employment drug and alcohol and substance screening (where required for the position and in accordance with applicable law);
- Information about driving logs, history and violations (in accordance with applicable law);
- Medical information (for the purpose of assessing any requests for accommodation during the application process); and
- Demographic information, if permitted by applicable laws (for workplace diversity purposes).

**(b) Sources of PI**

We may collect your PI from a number of sources, including:

- You, such as when you apply for employment with us (e.g., identification/identity data, contact details, educational and employment data), or otherwise during the course of our evaluation of your application for employment
- Your devices and our equipment and systems during the recruitment process
- From third parties (e.g., background check and vendors, references, job agencies), including third-party online services, and where permitted by applicable law, from publicly available online sources of data
- Our affiliates and related entities

**(c) Use of Personal Information**

Generally, we collect, retain, use, and disclose your personal information for recruitment purposes. Our recruitment purposes include the following:

- |   |   |
|---|---|
| • Evaluation of your application                | • Security, including electronic and of premises  |
| • Evaluation of your eligibility for employment | • Other purposes disclosed at the time you provide your information or done at your direction |
| • Employee Intake (if applicable)               |   |
| • Diversity and Inclusion initiatives           |   |

Additional business purposes that apply to our business more broadly, and that may apply in the HR context, include:

- To assignees or potential assignees as part of an acquisition, merger, asset sale, or other transaction where another party assumes or is considering assuming control over all or part of our business;

- Compliance with legal obligations or legal process;
- Where we believe we need to in order to investigate, prevent or take action if we think someone might be using information for illegal activities, fraud, or in ways that may threaten someone's safety or violate our policies or legal obligations; and
- Otherwise as required or authorized by applicable law.

**(d) Cross-Border Transfer**

We may transfer your personal information across provincial or national borders to fulfil any of the above purposes, including to the United States and other jurisdictions outside of your jurisdiction of residence in Canada, which may make that information subject to applicable disclosure laws in those jurisdictions. You may contact our Privacy Officer (whose contact information is provided below) to obtain information about our policies and practices regarding our transfer of personal information outside of your jurisdiction of residence or Canada, or to ask questions about the collection, use, disclosure or storage of personal information by us or our foreign service providers.

**(e) Consent**

We will obtain your consent to collect, use or disclose personal information except where we are authorized or required by law to do so without consent. For example, where permitted by law we will collect, use and disclose personal information about you relating to your potential employment (or onboarding for employment, if applicable) with us without your consent for the purposes of assessing your application for employment or, if applicable establishing your employment relationship with us. Other exceptions may apply.

Applicants may withdraw their consent to our continued use and disclosure of their personal information by contacting our Privacy Officer using the contact information provided below. Note that such withdrawal of consent may impact our continued ability to evaluate your application for employment or to extend an offer of employment to you, if applicable.

**(f) Limits on Collection of Personal Information**

We will not collect personal information indiscriminately but will limit collection of personal information to that which is reasonable and necessary. We will also collect personal information as authorized by law.

**(g) Use, Disclosure and Retention of Personal Information**

Your personal information will only be used or disclosed for the purposes set out above and as otherwise required or authorized by law.

We will keep personal information used to make a decision affecting you for at least one year after using it to make the decision.

We will also retain personal information for the time period required for the purpose of collection and/or where we have a legal obligation or right to retain the data. For instance, we may maintain business records for so long as required for the purpose of their collection, and/or may have a legal obligation to hold PI to comply with other legal or regulatory requirements or proceedings.

We will destroy, erase or make anonymous (to the extent permitted by applicable laws) documents or other records containing personal information as soon as it is reasonable to assume that the original

purpose is no longer being served by retention of the information and retention is no longer necessary for a legal purpose.

We will take due care when destroying personal information so as to prevent unauthorized access to the information.

#### **(h) Safeguarding Personal Information**

We protect the personal information in our custody or control by making reasonable security arrangements aimed at preventing unauthorized access, collection, use, disclosure, copying, modification, disposal or similar risks.

## **2. YOUR RIGHTS**

#### **(a) Accuracy**

We will make a reasonable effort to ensure that personal information we are using or disclosing is accurate and complete.

Depending on your jurisdiction (province or territory) of residence, you may have the right to request correction of your personal information held by LCE. If you demonstrate the inaccuracy or incompleteness of personal information, we will amend the information as required. If appropriate, we will send the amended information to third parties to whom the information has been disclosed.

If we do not correct the personal information, we will annotate the personal information under our control with a note that the correction was requested but not made.

#### **(b) Providing Access**

Depending on your jurisdiction of residence, you may have a right to access your personal information held by us.

We will make the information available within the timelines required by applicable law.

In some situations, we may not be able to provide access to certain personal information (e.g., if disclosure would reveal personal information about another individual, the personal information is protected by solicitor/client privilege, the information was collected for the purposes of an investigation or where disclosure of the information would reveal confidential commercial information that could harm our competitive position). We may also be prevented by law from providing access to certain personal information.

Where an access request is refused, we will notify you in writing, document the reasons for refusal and outline further steps which are available to you.

#### **(c) Changes**

We may update or revise this policy at any time. We will provide notice of any such updates or revisions. In the event that the scope of our collection, use, or disclosure of your personal information is modified as a result of such updates or revisions, you may, if required by applicable law, be asked to confirm your consent to such revised policy.

#### **(d) Complaints**

We will, on request, provide information regarding our complaint procedure.

Any inquiries, complaints or questions regarding this Policy should be directed in writing to our Privacy Officer as follows:

**Name:** Privacy Officer

**Address:** 2125 Woodward Ave, Detroit, MI 48201, Attn: Legal/HR

**E-mail:** [privacy@lcecorp.com](mailto:privacy@lcecorp.com)

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## Hot-N-Ready México - Aviso de privacidad para candidatos

**Fecha de entrada en vigor: 1 de noviembre de 2023**

Este Aviso de Privacidad (el "Aviso de Privacidad") describe nuestras prácticas relacionadas con el tratamiento de sus datos personales, es decir aquella información concerniente a una persona física identificada o identificable (los "Datos Personales"). Específicamente, este Aviso de Privacidad describe el tratamiento de los Datos Personales de los solicitantes y candidatos a un empleo en **Hot-N-Ready Mexico S. de R.L. de C.V.** El presente Aviso de Privacidad tiene por objeto satisfacer los requerimientos de la Ley Federal de Protección de Datos Personales en Posesión de los Particulares (la "Ley").

### 1. RESPONSABLE DEL TRATAMIENTO

**Hot-N-Ready Mexico S. de R.L. de C.V.** ("HNR"), con domicilio en Descartes #79, Col. Anzures, C.P. 11590, Ciudad de México, México, es el responsable del tratamiento y protección de sus Datos Personales.

Si usted es residente en México y ha interactuado con nosotros o nos ha proporcionado Datos Personales en relación con el proceso de solicitud de empleo, le rogamos que lea atentamente el presente, ya que en él se describe la forma en que recabamos, utilizamos, conservamos, divulgamos y tratamos sus Datos Personales, así como los derechos que le asisten en virtud de la Ley.

Este Aviso de Privacidad no se refiere al tratamiento de Datos Personales fuera del proceso de solicitud de empleo.

En caso de conflicto entre cualquier otra política, declaración o aviso de HNR y este Aviso de Privacidad, prevalecerá el presente en lo que respecta a los Datos Personales recabados y tratados como parte del proceso de solicitud de empleo, a menos que se indique lo contrario.

### 2. DATOS PERSONALES RECABADOS Y TRATADOS POR EL RESPONSABLE

#### Categorías de Datos Personales

Durante el proceso de solicitud de empleo, podemos recopilar las siguientes categorías de Datos Personales:

**a) Datos de identificación y contacto.** Nombre, dirección postal, número de teléfono, dirección de correo electrónico, permiso de conducir (en caso de ser necesario), estado civil, Clave Única de Registro de Población, Registro Federal de Contribuyentes.

**b) Características o rasgos personales.** Edad, sexo, nacionalidad, sólo cuando dicha información sea relevante para las finalidades establecidas en el presente Aviso de Privacidad.

**c) Información profesional o laboral.** Empleos y estudios actuales y anteriores, historial educativo, capacitación y habilidades, calificaciones oficiales, registros disciplinarios de instituciones educativas, experiencia laboral (empresa, cargo, duración, motivo de baja, trabajo desempeñado), conocimiento de idiomas, disponibilidad para viajar, disponibilidad para reubicarse, disponibilidad para empezar a trabajar.

**d) Datos personales sensibles.** Origen racial, información relacionada con características físicas, afiliación sindical, condición de salud, sólo cuando dicha información sea relevante para los fines establecidos en el presente Aviso de Privacidad.

### **Fuentes de datos personales**

Podemos recopilar sus Datos Personales de las siguientes fuentes:

- a) Usted, cuando solicita un empleo con nosotros (por ejemplo, datos de identificación, datos de contacto, datos educativos y laborales).
- b) De sus dispositivos y de nuestros equipos y sistemas.
- c) De otro personal de HNR a través de interacciones en el curso del proceso de solicitud de empleo (por ejemplo, entrevistas, etc.).
- d) De terceros (por ejemplo, proveedores y verificadores de antecedentes, referencias, reclutadores y agencias de empleo), incluidos servicios en línea de terceros, y de fuentes de acceso público.
- e) De nuestras filiales y entidades relacionadas.

### **Uso de los datos personales**

En general, recabamos, conservamos, utilizamos y transferimos sus Datos Personales según sea necesario para el proceso de solicitud de empleo. El tratamiento de sus datos personales tiene por objeto las siguientes finalidades principales:

- a) Identificarlo y ponernos en contacto con usted.
- b) Evaluar sus cualificaciones e idoneidad para el empleo, lo que puede incluir la programación de entrevistas, revisión de antecedentes, toma de decisiones de contratación y ampliación de ofertas.
- c) En su caso, para cumplir con las obligaciones derivadas de una posible relación jurídica entre usted y HNR.
- d) En su caso, y siempre que usted no se oponga, podremos conservar sus Datos Personales para ponernos en contacto con usted en relación con futuras ofertas de empleo en HNR. Conservaremos sus Datos Personales durante un máximo de un año tras la finalización de su solicitud de empleo.

No trataremos sus Datos Personales para finalidades secundarios o de mercadotecnia.

### **3. SUS DERECHOS COMO TITULAR DE DATOS PERSONALES Y CÓMO EJERCERLOS**

#### **Derechos ARCO**

Usted tiene derecho a: (i) acceder a sus Datos Personales; (ii) rectificar dichos Datos Personales en caso de ser inexactos o incompletos; (iii) cancelar sus Datos Personales; y (iv) oponerse al tratamiento para fines específicos (en conjunto, los "Derechos ARCO"). Para ejercer cualquiera de sus Derechos ARCO, póngase en contacto con nosotros en [privacy@lcecorp.com](mailto:privacy@lcecorp.com) y facilítenos la siguiente información:

- a) Nombre completo y correo electrónico o dirección.
- b) Acredite su identidad o, en su caso, la de su representante legal.
- c) Proporcione una descripción clara y precisa de los Datos Personales respecto de los cuales busca ejercer alguno de sus Derechos ARCO.
- d) Proporcione cualquier otra información que nos ayude a localizar sus Datos Personales.

En caso de ser necesario, podremos solicitarle información adicional que nos ayude a verificar su identidad o a localizar sus Datos Personales.

#### **Cómo revocar el consentimiento para el tratamiento de sus Datos Personales.**

Puede revocar su consentimiento para el tratamiento de sus Datos Personales en cualquier momento. Sin embargo, tenga en cuenta que es posible que no podamos responder a su solicitud o poner fin a nuestro uso de forma inmediata. Por ejemplo, es posible que necesitemos seguir tratando sus Datos Personales para cumplir con una obligación legal. Además, tenga en cuenta que la revocación del consentimiento puede dar lugar a la finalización de su relación con nosotros y el proceso de solicitud de empleo.

Hemos implementado un mecanismo mediante el cual usted puede revocar su consentimiento para el tratamiento de sus Datos Personales. Para ello, póngase en contacto con nosotros en [privacy@lcecorp.com](mailto:privacy@lcecorp.com).

#### **Otros derechos**

Si usted considera que alguna conducta u omisión de nuestra parte ha afectado sus derechos de protección de Datos Personales, puede presentar una queja ante el Instituto Nacional de Transparencia, Acceso a la Información y Protección de Datos Personales (INAI). Para más información, visite la página oficial: [www.inai.org.mx](http://www.inai.org.mx).

### **4. TRANSFERENCIAS**

Sus Datos Personales sólo serán comunicados o transferidos a proveedores, afiliadas, empresas del grupo, entidades relacionadas, entidades gubernamentales o a terceros a quienes sea necesario comunicarlos para cumplir con las finalidades descritas en el presente Aviso de Privacidad. En cualquier caso, HNR tomará las medidas necesarias para proteger y salvaguardar la confidencialidad de sus Datos Personales. HNR podrá transferir sus Datos Personales, sin requerir su consentimiento, en los casos previstos y autorizados por la Ley.

## **5. MODIFICACIONES AL AVISO DE PRIVACIDAD**

Nos reservamos el derecho de efectuar en cualquier momento modificaciones o actualizaciones al presente Aviso de Privacidad. Cuando los cambios sean sustanciales y resulte necesario, le haremos llegar una notificación por correo electrónico enviado a la dirección que nos haya proporcionado.

## **6. CONTACTO**

Si tiene alguna pregunta sobre este Aviso de Privacidad o sobre las prácticas aquí descritas, puede ponerse en contacto con nosotros en:

Correo Postal:

**Hot-N-Ready México S. de R.L. de C.V.**

Attn: Legal/Privacidad

Descartes #79, Col. Anzures, C.P. 11590,

Ciudad de México, México.

Correo electrónico: [privacy@lcecorp.com](mailto:privacy@lcecorp.com)

**Fecha de última actualización: octubre de 2023.**