#### **CONTRACTOR PRIVACY POLICY**

Effective Date: June 30, 2023

The Privacy Policy describes how Harmony Foods, LLC dba SCN BestCo ("SCN Bestco", "us," "we," and "our"), collects, stores, uses and discloses personal information about independent contractors who provide services to SCN BestCo. This notice describes how we use that personal information, to whom we disclose it, how you can exercise your data choices, and how you can contact us.

**California Residents**: See the California Privacy Rights section below for important information about your personal information and rights under applicable state privacy laws.

**Not in scope**. This Privacy Policy does not apply to interactions with SCN Bestco outside of the independent contractor context, such as applying to work with us or browsing our website. Please click <a href="here">here</a> to review our Privacy Notice to learn more about our privacy practices related to those types of interactions. We may also collect, generate, use and disclose aggregate, anonymous, and other non-identifiable data, which is not personal information subject to this Privacy Policy.

If you have any questions, please contact us as provided below. You may download a copy of this Privacy Policy by clicking <a href="here">here</a>. If you need to receive this Privacy Policy in a different format, please contact us at 1-866-942-2429 or <a href="mailto:privacy@SCNBestco.com">privacy@SCNBestco.com</a>.

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# **Categories of Personal Information We Collect**

We collect, and in the preceding 12 months have collected, the below categories of contractor personal information with your consent or as otherwise required or permitted by law.

- **Identifiers**, such as your name, which we obtain from your employer, and if you provide your name to us.
- Professional Information, such as information related to work hours while at our facilities.
- Audio, Visual, or Similar Information, such as CCTV security camera recordings.

• **Biometric Information**, such as your fingerprints.

#### **Sources Of Personal Information**

We collect, and in the preceding 12 months have collected, personal information in the following ways:

- Directly from you. We may collect Personal Information directly from you, such as when you
  arrive at a SCN BestCo facility, during your rendering of services to SCN BestCo, and/or when you
  cease providing services to SCN BestCo.
- **From third parties.** We may collect certain Personal Information about you from third parties. For example, this includes from your employer, who will provide your name to us. This also includes information concerning the time you spend working at a SCN BestCo facility. We may combine information that we collect from different sources.

### **Purposes for Collecting Personal Information**

We use personal information for the following business and commercial purposes:

- **Business Operations.** We use identifiers, professional information, and audio, visual, or similar information to facilitate your contracting relationship with us, including for payment administration, to maintain files, and to otherwise run our day-to-day operations.
- **Communicate With You.** We use the identifiers and professional information we collect to communicate with you regarding the services you provide to us.
- **Communicate With Your Employer.** We use the identifiers and professional information we collect to communicate with your regarding the services you provide to us.
- Legal Compliance and Protection. We use the identifiers, professional information, and audio, visual, or similar information we collect to comply with applicable laws, our legal obligations and in our defense of our company, property, and others through legal proceedings.
- Security and Crime Prevention. We use identifiers and audio, visual, or similar information to secure our facilities, such as by conducting periodic security checks and limiting access to our facilities

#### **How We Disclose Personal Information**

We disclose personal information in the following circumstances:

- Service Providers. We share personal information with vendors and service providers who
  support the operation of our business, including your employer. In some cases, the service
  provider may directly collect the information from you. In the past 12 months, we have disclosed
  identifiers and professional information to our service providers.
- Professional Advisors. We may share information with professional advisors, such as lawyers, bankers, tax consultants, auditors, and insurers, where necessary in the course of the professional services that they render to us. In the past 12 months, we have disclosed identifiers and professional information to our professional advisors.
- **Government Entities**. We share information with regulatory and government entities including government, administrative, law enforcement and regulatory agencies; tax authorities; and other public agencies or authorities if we think we should in order to comply with any applicable law,

regulation, legal process or other legal obligation. This includes cooperating with law enforcement when we think it is appropriate, obtaining legal remedies or limiting our damages, and to enforcing or protecting our contracts, legal rights or the rights of others, including by responding to claims asserted against us. In the past 12 months, we have disclosed identifiers to government entities.

- Affiliates. We may share some or all of your personal information with our parent company, subsidiaries, and other companies under common ownership or control with us for purposes consistent with this Privacy Policy.
- Other Reasons. We may disclose personal information for other reasons we may describe to you, including if you consent to the disclosure or direct us to disclose your information.

### **How Long We Keep Personal Information**

To the extent permitted by applicable law, we will retain your personal information for as long as reasonably necessary to fulfill the purposes for which it was collected, including to meet any legal, accounting, or other reporting requirements or obligations. We use the following criteria to determine retention periods:

- how long the information is needed to provide our services and operate our business;
- whether there are contractual or legal obligations that exist that require us to retain the information for period of time;
- whether any law, statute, or regulation allows for a specific retention period;
- whether an individual has agreed to a longer retention period;
- whether the data is considered to be sensitive data; and
- what the expectation for retention was at the time the data was provided to us.

## Security

We follow generally accepted industry standards to protect the personal information submitted to us and have implemented reasonable technical, organization, administrative and physical measures to protect personal information. No method of transmission or method of electronic storage, is 100% secure, however.

# **Processing in the United States**

Please be aware that information we obtain about you will be processed in the United States by our service providers or us. By having providing services to us, and/or by providing us with your personal information, you acknowledge your personal information may be transferred to and processed in jurisdictions outside your own as described in this Privacy Policy. Please be aware that the data protection laws and regulations that apply to your personal information transferred to the United States or other jurisdictions may be different from the laws in your country of residence. The United States may not afford the same level of protection as laws in your own country.

# **California Privacy Rights**

If you are a California resident, this section applies to you.

#### California Consumer Privacy Act ("CCPA"), as Amended by the California Privacy Rights Act ("CPRA").

<u>Sale or Sharing of Personal Information</u>. In the preceding 12 months, we have not "sold" or "shared" (as those terms are defined in the CCPA) any personal information to "third parties", as that term is defined in the CCPA.

Sensitive Personal Information. We do not collect "sensitive personal information" from you.

<u>Your Rights Under the CCPA</u>. Subject to certain exceptions and limitations, the CCPA affords California consumers the following rights:

- You have the right to request that we tell you (i) what personal information we have collected about you, (ii) the sources of that information, (iii) the purposes for collecting, selling or sharing the personal information; and (iv) the categories of third-parties to whom we have disclosed personal information.
- You have the right to request that we provide you with a copy of your personal information.
- You have the right to request that we delete personal information that we have collected from you. We may not delete all of your personal information if one of the exceptions to the CCPA applies.
- You have the right to correct inaccurate personal information that we hold about you.
- You have the right to not be discriminated against for exercising any of your CCPA rights. We will not discriminate against you if you exercise any of your CCPA rights.

<u>Exercising Your Rights</u>. To exercise any of your rights, please email us at <u>privacy@SCNBestco.com</u>, call us toll free at 1-866-942-2429, or use the webform <u>link</u> on our website to submit a request. We cannot process your request if you do not provide us with sufficient detail to allow us to understand and respond to it. You can ask to appeal any denial of your request in the same manner through which you may submit a request.

For all requests, you should provide us with sufficient information to verify your identity and process your request. Failure to provide identifying information may prevent us from processing your request. If you have requested that we correct your personal information, we may contact you to request additional information about the personal information that you believe is inaccurate, including supporting documentation.

<u>Authorized Agents</u>. Your authorized agent may be able to make a request on your behalf. However, we may need to verify your authorized agent's identity and authority to act on your behalf. We may require a copy of a valid power of attorney given to your authorized agent pursuant to applicable law. If you have not provided your agent with such a power of attorney, we may ask you to take additional steps permitted by law to verify that your request is authorized, such as by providing your agent with written and signed permission to exercise your rights on your behalf, the information we request to verify your identity, and confirmation that you have given the authorized agent permission to submit the request.

#### **Contact Us**

If you have any questions about this Policy or our privacy practices, please contact <a href="mailto:privacy@SCNBestco.com">privacy@SCNBestco.com</a> or call us toll free at 1-866-942-2429.

### **Updates to Our Privacy Policy**

This Contractor Privacy Policy may be updated from time to time for any reason. If we make material changes to this Contractor Privacy Policy we will notify you by posting the new Contractor Privacy Policy at SCNBestco Privacy Policy and changing the effective date listed at the top of this Contractor Privacy Policy. If required by law we will also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via e-mail or another manner with which we communicate with you as a contractor. Any modifications to this Contractor Privacy Policy will be effective upon our posting the modified version as described above (or as otherwise indicated at the time of posting).