



EMPLOYEE PRIVACY POLICY

Effective Date: December 1, 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 you as a former or current employee in connection with your employment. 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 employment context, such as applying to work with us or browsing our website. Please visit <https://www.scnbestco.com/privacy-policy-2023/> 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 visiting <https://www.scnbestco.com/employee-privacy-policy/>. If you need to receive this Privacy Policy in a different format, please contact us at 1-866-942-2429 or privacy@SCNBestco.com.

Contents

- **Categories of Personal Information We Collect**
<https://www.scnbestco.com/employee-privacy-policy/#Personal-Information-We-Collect>
- **Sources Of Personal Information**
<https://www.scnbestco.com/employee-privacy-policy/#Sources-Personal-Information>
- **Purposes for Collecting Personal Information**
<https://www.scnbestco.com/employee-privacy-policy/#Collecting-Personal-Information>
- **How We Disclose Personal Information**
<https://www.scnbestco.com/employee-privacy-policy/#Disclose-Personal-Information>
- **How Long We Keep Personal Information**
<https://www.scnbestco.com/employee-privacy-policy/#Keep-Personal-Information>
- **Security**
<https://www.scnbestco.com/employee-privacy-policy/#Security>
- **Processing in the United States**
<https://www.scnbestco.com/employee-privacy-policy/#Processing-United-States>
- **California Privacy Rights**
<https://www.scnbestco.com/employee-privacy-policy/#California-Privacy-Rights>
- **Contact Us**
<https://www.scnbestco.com/employee-privacy-policy/#Contact-Us>
- **Updates to Our Privacy Policy**
<https://www.scnbestco.com/employee-privacy-policy/#Updates-Privacy-Policy>

Categories of Personal Information We Collect

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

- **Identifiers**, such as your name, signature, employee number, driver's license or ID, email address, phone number, mailing address, and emergency contact information from you during our application and onboarding processes and if you update your information with us. Additionally, we collect your social security number, passport number, tax identification number, or other I-9 documentation to show your identity and authorization to work.
- **Characteristics of Protected Classifications**, such as your date of birth, age, gender identity, race, racial or ethnic origin, citizenship, veteran status, disability information, marital status, or pregnancy and related information, if you provide this information as part of your application, during onboarding, or while working at SCN BestCo.
- **Audio/Visual Data or Similar Information**, such as your employee photograph or CCTV security camera recordings to identify you to other employees and/or our security personnel.
- **Biometric Information**, such as characteristics about you that can be used to establish your identity, like your fingerprints.
- **Professional or Employment Information**, such as information related to your employment history. Additionally, we collect information from you during your employment with us, such as dates of employment, your work attendance, and records pertaining to your work performance.
- **Education Information**, such as your education history.
- **Financial Information**, such as your bank account information to process payroll.
- **Health Insurance Information**, such as your policy number, coverage information, dependent or spouse information, worker's compensation, requests for disability accommodation, or any similar request.
- **Medical Information**, such as your health, medical and treatment history, diagnoses, dates of service, provider name, and your ability to work, to the extent permitted and required by applicable laws.

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 during the job application or onboarding process, during your employment, and/or when you experience a change in your employment status with us.
- **From third parties.** We may collect certain Personal Information about you from third parties. For example, this includes from vendors that run background checks and perform drug and alcohol screenings, or vendors that administer leave of absence and disability benefits. This also includes information from references. Other employees may provide us with information about you, such as performance or evaluation information from a manager or supervisor. 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:

- **Onboarding.** We use identifiers, characteristics of protected classifications, audio, visual, or similar information, biometric information, professional or employment information, and education information to complete new hire paperwork, enroll you in our HR system, and set up your personnel file.
- **Benefits.** We use identifiers, financial information, professional or employment information, health insurance information, and medical information we collect to create benefits packages and, if eligible, provide you employee benefits through third-party benefits administrators.
- **Payroll.** We use identifiers, professional or employment information, and financial information to manage and pay you for services provided.
- **Leave and Accommodation Requests.** We use identifiers, professional or employment information, and characteristics of protected classifications we collect to evaluate and process time off, sick leave, leaves of absence, or accommodation requests, if you make such requests.
- **Training, Performance Reviews, and Goals Monitoring.** We use identifiers and professional or employment information we collect to provide you with relevant training, feedback, and to support your career development.
- **Business Operations.** We use the personal information we collect to guide our recruiting and hiring process, maintain files, and support our business operations and the operations of our parent(s), subsidiaries, and affiliates.
- **Security and Crime Prevention.** We use identifiers, audio/visual data or similar information, biometric information, and professional or employment information, to secure our facilities and networks, such as by monitoring access to our network; conducting periodic security checks; and limiting access to our facilities.
- **Legal Compliance and Protection.** We use the personal information we collect to comply with applicable laws, our legal obligations and in our defense of our company, property, and others through legal proceedings.

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 our payroll provider(s), benefits administrator(s), insurance administrator(s), retirement plan administrator(s), and employee relocation service providers. In some cases, the service provider may directly collect the information from you. In the past 12 months, we have disclosed identifiers, financial information professional or employment information, and health insurance 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, characteristics of protected classifications, professional or employment information, and education 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 XYZ/ OR We have not disclosed any personal information to government entities.

- **Corporate Transaction Recipients.** We may share information with potential investors, purchasers, merger partners, and their advisors in the event we: (i) sell or transfer, or are considering selling or transferring, all or a portion of our business or assets; or (ii) are considering or engaging in any reorganization, conversion, merger, sale, joint venture, assignment, transfer or disposition of all or any portion of our ownership interest, business or operations; or (iii) are soliciting or accepting investments.
- **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 an employment relationship with 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”).

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

Use or Disclosure of Sensitive Personal Information. The following forms of data listed above constitutes “sensitive personal information”: Your social security, driver’s license, state identification card, or passport number; your bank account information; your racial or ethnic origin; your citizenship status; your immigration status; your biometric information; and your health information, if provided to us. We do not use or disclose sensitive personal information for any purpose other than those permitted by the CCPA and its interpretive regulations.

Your Rights Under the CCPA. 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.

Exercising Your Rights. To exercise any of your rights, please email us at privacy@SCNBestco.com, or call us toll free at 1-866-942-2429, or use the webform here: <https://www.scnbestco.com/privacy-form/> 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 your name, employee ID number, email address, phone number, and mailing address. We will verify your identity by matching the information we have regarding our current and former employees against the information you have provided. Failure to provide the foregoing 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.

Authorized Agents. 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 privacy@SCNBestco.com or call us toll free at 1-866-942-2429. In addition, you may contact HR at benefits@scnutr.com.

At-Will Employment

This Employee Privacy Policy does not form any part of any contract of employment. Your status as a current/former at-will employee with us does not change by virtue of this Employee Privacy Policy.

Updates to Our Privacy Policy

This Employee Privacy Policy may be updated from time to time for any reason. If we make material changes to this Privacy Policy we will notify you by posting the new Privacy Policy at <https://www.scnbestco.com/privacy-policy-2023> and changing the effective date listed at the top of this 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 an employee. Any modifications to this Employee Privacy Policy will be effective upon our posting the modified version as described above (or as otherwise indicated at the time of posting).