

# **PRIVACY POLICY**

(Effective as of January 1, 2020; Updated as of December 26, 2019)

## **I. Introduction**

This privacy policy (“Privacy Policy”) is intended to provide consumers a description of the United States Cold Storage, Inc.’s (“USCS” or “the Company”) practices, both online and offline, with respect to the Company’s collection, use, disclosure, and sale – to the extent the Company engages in any of these acts – of consumers’ personal information and of consumers’ rights regarding their personal information. The Privacy Policy describes the Company’s generalized practices and is not intended to provide specific information regarding the Company’s activities with respect to an individual consumer’s personal information. For purposes of the Privacy Policy, the term “you” or “user” means any person viewing the Privacy Policy or a consumer whose personal information is collected and/or utilized by the Company.

Terms not defined herein shall have the meanings ascribed to those terms by the California Consumer Privacy Act (“CCPA,” Cal. Civ. Code §1798.100 et seq.), the regulations to the CCPA, and the California Online Privacy Protection Act (“COPAA,” Cal. Bus. & Prof. Code §22575 et seq.).

If you are unable to access this policy because of a language barrier, disability, or any other reason, please contact Nicole Janeczek at (856) 209-7416 so that the Company can provide you with a version of the Privacy Policy accessible to you.

**BY USING THE COMPANY’S WEBSITE, YOU ARE INDICATING YOUR CONSENT TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH THIS PRIVACY POLICY, YOU SHOULD NOT USE THIS WEBSITE.**

## **II. Collection, Disclosure, and Use of Personal Information**

### **1. Summary of USCS’s Collection and Use of Personal Information**

USCS is a national cold storage company that employs thousands of people throughout California and the rest of the United States. The Company collects certain personal information from job applicants, employees, contractors, employee beneficiaries, and other related people as required by law and as required for the Company’s human resource (“HR”) processes.

For example, personal information commonly collected by the Company includes information submitted in online and paper job applications, personal information included on HR and payroll forms, performance reviews, and job-related electronic communications and services (such as log-in identifications). Generally, this information is collected in order to comply with the Company’s legal obligations and HR practices.

USCS respects each persons’ right to privacy, including the right to data privacy. Therefore, the Company processes sensitive personal data only as needed to meet legal obligations and retains all personal information securely in compliance with all applicable laws. The Company also works with its vendors to ensure compliance with applicable privacy requirements where personal information collected by the Company is shared with those vendors in the regular course of business.

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## 2. Table of USCS’s Collection, Disclosure and Use of Personal Information

Below is a table that explains what personal information the Company has collected over the past twelve months, the categories of sources from which the Company collected the information, and the categories of Third Parties and Service Providers with whom the Company shares the personal information. Additionally, the table identifies whether or not the Company has sold or otherwise made available to Third Parties for a commercial purpose any category of personal information within the past twelve months. The Company does not sell the personal information of minors under 16 years of age without affirmative authorization.

INFORMATION COLLECTED	SOURCES OF INFORMATION	BUSINESS PURPOSE(S)	THIRD PARTIES TO WHOM INFORMATION IS DISCLOSED
<b>JOB APPLICANT(S)</b>			
<p><u>Identifiers</u>, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Legal names and aliases;</li> <li>• Signatures;</li> <li>• Addresses;</li> <li>• Telephone Numbers;</li> <li>• Email Addresses;</li> <li>• Social Security Numbers;</li> <li>• Driver’s License Numbers</li> </ul>	<p>We collect this information directly from you when you:</p> <ul style="list-style-type: none"> <li>• Submit an application or accept a job offer.</li> <li>• Acknowledge understanding of application or employment-related terms.</li> <li>• Complete pre-employment documents.</li> </ul> <p>We may also collect this information from:</p> <ul style="list-style-type: none"> <li>• Background verification services.</li> <li>• Staffing services.</li> <li>• Local, State, or Federal agencies.</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• Verify references and past employment;</li> <li>• Completing pre-employment processes;</li> <li>• Verifying acknowledgement of application terms;</li> <li>• Relaying specific communications or information by mail;</li> <li>• Contacting applicants for various verbal communication needs;</li> <li>• Sending written electronic communications to applicants;</li> <li>• Identifying prospective employees;</li> <li>• Running background checks compliant with FCRA requirements;</li> <li>• Validating legal ability to drive when required;</li> <li>• Running motor vehicle reports in pre-and post-employment processes</li> </ul>	<p>We share identifiers with the following categories of persons in the following circumstances:</p> <ul style="list-style-type: none"> <li>• With other users and Third Parties when you direct us to.</li> <li>• With financial technology Service Providers when you direct us to.</li> <li>• With background and credit-checking Service Providers when you direct us to.</li> <li>• With other Service Providers who help operate our Website and operation of supportive administrative sites</li> <li>• Internal USCS contacts for administrative needs or to consider a transfer or promotion.</li> </ul> <p>We do not sell this information.</p> <ul style="list-style-type: none"> <li>•</li> </ul>
<p><u>Background Information</u>, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Employment and Educational History;</li> <li>• Medical Information and History</li> </ul>	<p>We collect some of this information directly from you when you:</p> <ul style="list-style-type: none"> <li>• Submit an application or accept a job offer.</li> <li>• Complete pre-employment documents.</li> <li>• Request an accommodation in compliance with the Americans with Disabilities Act (ADA).</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• Determine whether base qualifications for job positions are met;</li> <li>• Complying with the Americans with Disabilities Act’s (“ADA”) accommodation analysis;</li> </ul>	<p>We share this information with the following categories of persons in the following circumstances:</p> <ul style="list-style-type: none"> <li>• Internal USCS contacts for administrative and reporting needs.</li> </ul>

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	<p>We may also collect this information from:</p> <ul style="list-style-type: none"> <li>● Background verification services.</li> <li>● Drug/alcohol testing clinics.</li> <li>● Staffing Services.</li> <li>● Local, State, or Federal agencies.</li> </ul>	<ul style="list-style-type: none"> <li>● Analyzing drug/alcohol testing results</li> <li>● Provide administrative support following an occupational injury.</li> </ul>	<p>We do not share or sell this information with any third parties.</p>
<b>EMPLOYEE(S), OWNER(S), DIRECTOR(S), AND OFFICER(S)</b>			
<p><u>Identifiers</u>, including but not limited to:</p> <ul style="list-style-type: none"> <li>● Legal names and aliases;</li> <li>● Signatures;</li> <li>● Addresses;</li> <li>● Telephone Numbers;</li> <li>● Email Addresses;</li> <li>● Social Security Numbers;</li> <li>● Driver’s License Numbers</li> <li>● State ID Card Number;</li> <li>● Federal ID Card Number;</li> <li>● Passport Number</li> </ul>	<p>We collect this information directly from you when you:</p> <ul style="list-style-type: none"> <li>● Acknowledge understanding of employment-related terms or training.</li> <li>● Update or confirm contact information.</li> <li>● Provide emergency contact or beneficiary information.</li> <li>● Provide tax withholding documents.</li> <li>● Certify continued legal ability to drive.</li> </ul> <p>We may also collect this information from:</p> <ul style="list-style-type: none"> <li>● Background verification services.</li> <li>● Local, State, or Federal agencies.</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>● Process payroll;</li> <li>● Withhold and pay appropriate taxes;</li> <li>● Administer benefits (such as insurance and 401(k) benefits);</li> <li>● Verify acknowledgement and receipt of training and other employee-related items;</li> <li>● Send written communications;</li> <li>● Contact and verbally communicate;</li> <li>● Send electronic written communications;</li> <li>● Comply with various state and federal laws;</li> <li>● Validate legal ability to drive;</li> <li>● Verify employee identity and employment authorization in tandem with an I-9 Employment Eligibility Verification Form</li> </ul>	<p>We share identifiers with the following categories of persons in the following circumstances:</p> <ul style="list-style-type: none"> <li>● With other users and Third Parties when you direct us to.</li> <li>● With financial technology Service Providers when you direct us to.</li> <li>● With other Service Providers who help operate our Website and operation of supportive administrative sites</li> <li>● Internal USCS contacts for administrative needs or to consider a transfer or promotion.</li> <li>● Local, State, and Federal agencies where required.</li> </ul> <p>We do not sell this information.</p>
<p><u>Background Information</u>, including but not limited to:</p> <ul style="list-style-type: none"> <li>● Employment and Educational History;</li> <li>● Medical Information and History</li> </ul>	<p>We collect some of this information directly from you when you:</p> <ul style="list-style-type: none"> <li>● Submit documents for consideration for a transfer or promotion.</li> <li>● Complete benefit enrollment processes.</li> <li>● Request an accommodation.</li> <li>● Establish a workers’ compensation claim.</li> </ul> <p>We may also collect this information from:</p> <ul style="list-style-type: none"> <li>● Background verification services.</li> <li>● Drug/alcohol testing clinics.</li> <li>● Occupational physicians.</li> <li>● Local, State, or Federal agencies.</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>● Assess an employee’s eligibility to work in various positions with the Company;</li> <li>● Comply with the ADA’s accommodation analysis;</li> <li>● Analyze drug/alcohol testing results;</li> <li>● Analyze veracity of benefit requests;</li> <li>● Administer benefits</li> </ul>	<p>We share this information with the following categories of persons in the following circumstances:</p> <ul style="list-style-type: none"> <li>● With other users and Third Parties when you direct us to.</li> <li>● With other Service Providers who help operate our Website and operation of supportive administrative sites</li> <li>● Internal USCS contacts for administrative needs or to consider a transfer or promotion.</li> </ul> <p>We do not sell this information.</p>

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<p><u>Protected Classifications</u>, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Age;</li> <li>• Race;</li> <li>• Gender</li> </ul>	<p>We collect this information directly from you when you:</p> <ul style="list-style-type: none"> <li>• Provide demographic information requested for Equal Employment Opportunity Commission reporting (optional)</li> </ul> <p>We may also collect this information from:</p> <ul style="list-style-type: none"> <li>• Occupational physicians.</li> <li>• Local, State, or Federal agencies.</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• Comply with state and federal law;</li> <li>• Reporting demographics as required by the Equal Employment Opportunity Commission</li> </ul>	<p>We share this information with the following categories of persons in the following circumstances:</p> <ul style="list-style-type: none"> <li>• Internal USCS contacts for administrative needs.</li> <li>• Equal Employment Opportunity Commission reporting (demographics only)</li> </ul> <p>We do not sell this information</p>
<p><u>Financial Information</u>, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Bank Account Numbers</li> </ul>	<p>We collect some of this information directly from you when you:</p> <ul style="list-style-type: none"> <li>• Request direct deposit payments.</li> </ul> <p>We may also collect this information from:</p> <ul style="list-style-type: none"> <li>• N/A</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• Process payroll;</li> <li>• Administer direct deposit payments;</li> <li>• Comply with payroll tax withholding legal obligations</li> </ul>	<p>We share this information with the following categories of persons in the following circumstances:</p> <ul style="list-style-type: none"> <li>• Internal USCS contacts for administrative needs.</li> </ul> <p>We do not sell this information</p>
<p><u>Geolocation Data</u>, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Precise or approximate location as determined through data such as your IP address or mobile device's GPS</li> </ul>	<p>We collect some of this information directly from you when you:</p> <ul style="list-style-type: none"> <li>• Utilize the timekeeping system.</li> <li>• Drive a company Class A vehicle.</li> </ul> <p>We may also collect this information from:</p> <ul style="list-style-type: none"> <li>• N/A</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• Tracking truck driver locations;</li> <li>• Record time worked for purposes of timekeeping administration</li> </ul>	<p>We share this information with the following categories of persons in the following circumstances:</p> <ul style="list-style-type: none"> <li>• Internal USCS contacts for administrative needs.</li> </ul> <p>We do not sell this information</p>
<p><u>Commercial Information</u>, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Records of Products or Services Obtained</li> </ul>	<p>We collect some of this information directly from you when you:</p> <ul style="list-style-type: none"> <li>• Submit an expense reimbursement request.</li> <li>• Enroll in company-provided benefits.</li> </ul> <p>We may also collect this information from:</p> <ul style="list-style-type: none"> <li>• N/A</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• Reimburse employees for business-related expenses;</li> <li>• Administer benefits</li> </ul>	<p>We share this information with the following categories of persons in the following circumstances:</p> <ul style="list-style-type: none"> <li>• Internal USCS contacts for administrative needs.</li> <li>• Local, State, and Federal agencies where required.</li> </ul> <p>We do not sell this information</p>
<p><u>Biometric information</u>, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Fingerprints;</li> <li>• Imagery of the Iris;</li> <li>• Visual Records, Including Photographs</li> </ul>	<p>We collect some of this information directly from you when you:</p> <ul style="list-style-type: none"> <li>• Enroll in the timekeeping system.</li> <li>• Enter a USCS facility.</li> <li>• Participate in work-related events.</li> </ul> <p>We may also collect this information from:</p> <ul style="list-style-type: none"> <li>• N/A</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• Allow employees to log working time using the Company's timekeeping system;</li> <li>• Identify employees in conjunction with the Company's site-security system</li> </ul>	<p>We share this information with the following categories of persons in the following circumstances:</p> <ul style="list-style-type: none"> <li>• Internal USCS contacts for administrative needs.</li> </ul> <p>We do not sell this information</p>
<p><u>Internet or other electronic network</u></p>	<p>We collect some of this information directly from you when you:</p>	<p>We use this information to:</p>	<p>We share this information with the following categories of</p>

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<p><u>activity information</u>, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Internet Activity</li> <li>• Web Tracking Information</li> </ul>	<ul style="list-style-type: none"> <li>• Utilize Company equipment that accesses the internet or company websites.</li> </ul> <p>We may also collect this information from:</p> <ul style="list-style-type: none"> <li>• Company equipment directly</li> </ul>	<ul style="list-style-type: none"> <li>• Investigate misconduct and discipline employees</li> </ul>	<p>persons in the following circumstances:</p> <ul style="list-style-type: none"> <li>• Internal USCS contacts for administrative needs.</li> <li>• Local, State, and Federal agencies where required.</li> </ul> <p>We do not sell this information</p>
<b>CONTRACTOR(S)</b>			
<p><u>Identifiers</u>, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Legal names and aliases;</li> <li>• Signatures;</li> <li>• Addresses;</li> <li>• Telephone Numbers;</li> <li>• Email Addresses;</li> <li>• Federal Tax ID Number</li> </ul>	<p>We collect this information directly from you when you:</p> <ul style="list-style-type: none"> <li>• Submit a quote or accept a project.</li> <li>• Acknowledge understanding or compliance with policies, terms, or legal requirements.</li> <li>• Acknowledge receipt or distribution of goods, properties, or services.</li> <li>• Provide services or products as a vendor or contractor.</li> <li>• Invoice for goods or services.</li> <li>• Request an ACH payment method.</li> </ul> <p>We may also collect this information from:</p> <ul style="list-style-type: none"> <li>• Internet websites.</li> <li>• Local, State, or Federal agencies.</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• Track vendor contracts;</li> <li>• Verify compliance with Company policy;</li> <li>• Verify compliance with state and federal legal requirements;</li> <li>• Acknowledge receipt or distributions of goods, property, services;</li> <li>• Acknowledge terms of business relationship with the Company;</li> <li>• Pay or distribute invoices;</li> <li>• Send written communications;</li> <li>• Send electronic written communications;</li> <li>• Verbally communicate;</li> <li>• Process payments via ACH if requested;</li> <li>• Comply with tax reporting laws</li> </ul>	<p>We share this information with the following categories of persons in the following circumstances:</p> <ul style="list-style-type: none"> <li>• Internal USCS contacts for administrative needs.</li> <li>• With other users and Third Parties when you direct us to.</li> <li>• With other Service Providers who help operate our Website and operation of supportive administrative sites</li> <li>• Local, State, and Federal agencies where required.</li> </ul> <p>We do not sell this information</p>
<p><u>Financial Information</u>, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Bank Account Numbers</li> </ul>	<p>We collect some of this information directly from you when you:</p> <ul style="list-style-type: none"> <li>• Request an ACH payment method.</li> </ul> <p>We may also collect this information from:</p> <ul style="list-style-type: none"> <li>• N/A</li> </ul>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• Process payments via ACH if requested</li> </ul>	<p>We share this information with the following categories of persons in the following circumstances:</p> <ul style="list-style-type: none"> <li>• Internal USCS contacts for administrative needs.</li> <li>• With financial technology Service Providers when you direct us to.</li> </ul> <p>We do not sell this information</p>
<p><u>Biometric information</u>, including but not limited to:</p> <ul style="list-style-type: none"> <li>• Visual Records, Including Photographs and Video Recordings</li> </ul>	<p>We collect some of this information directly from you when you:</p> <ul style="list-style-type: none"> <li>• Enter a USCS site.</li> <li>• Register into the badging system for site access.</li> </ul> <p>We may also collect this information from:</p>	<p>We use this information to:</p> <ul style="list-style-type: none"> <li>• Identify authorized persons in conjunction with site security system</li> </ul>	<p>We share this information with the following categories of persons in the following circumstances:</p> <ul style="list-style-type: none"> <li>• Internal USCS contacts for administrative needs.</li> </ul>

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	<ul style="list-style-type: none"> <li>N/A</li> </ul>		We do not sell this information
<b>EMERGENCY CONTACT(S) FOR JOB APPLICANT(S), EMPLOYEE(S), OWNER(S), DIRECTOR(S), OFFICER(S), MEDICAL STAFF MEMBER(S), AND/OR CONTRACTOR(S)</b>			
<b>Identifiers</b> , including but not limited to: <ul style="list-style-type: none"> <li>Legal names and aliases;</li> <li>Telephone Numbers</li> </ul>	We collect this information directly from you when you: <ul style="list-style-type: none"> <li>Provide emergency contact or beneficiary information.</li> </ul> We may also collect this information from: <ul style="list-style-type: none"> <li>N/A</li> </ul>	We use this information to: <ul style="list-style-type: none"> <li>Verbally communicate</li> </ul>	We share this information with the following categories of persons in the following circumstances: <ul style="list-style-type: none"> <li>Internal USCS contacts for administrative needs.</li> </ul> We do not sell this information
<b>BENEFICIARIES OF JOB APPLICANT(S), EMPLOYEE(S), OWNER(S), DIRECTOR(S), OFFICER(S), MEDICAL STAFF MEMBER(S), AND/OR CONTRACTOR(S)</b>			
<b>Identifiers</b> , including but not limited to: <ul style="list-style-type: none"> <li>Legal names and aliases;</li> <li>Telephone Numbers;</li> <li>Addresses;</li> <li>Email Addresses</li> </ul>	We collect this information directly from you when you: <ul style="list-style-type: none"> <li>Provide emergency contact or beneficiary information.</li> </ul> We may also collect this information from: <ul style="list-style-type: none"> <li>Local, State, or Federal agencies.</li> </ul>	We use this information to: <ul style="list-style-type: none"> <li>Verbally communicate;</li> <li>Send written communications;</li> <li>Send electronic written communications;</li> <li>Distribute benefits</li> </ul>	We share this information with the following categories of persons in the following circumstances: <ul style="list-style-type: none"> <li>Internal USCS contacts for administrative needs.</li> <li>Third party benefit administration personnel for immediate or eventual benefit distribution</li> <li>With financial technology Service Providers when you direct us to.</li> </ul> We do not sell this information

## III. Statement of Consumers' California Rights With Respect to Their Personal Information

### A. Summary of Consumers' Rights

The CCPA grants consumers (California residents) certain rights with respect to their personal information. The Company respects the privacy rights of consumers and endeavors to make known to and comply fully with the rights granted to consumers by the CCPA.

In summary, the CCPA grants consumers the following rights:

- The right to request disclosure of the Company's data collection and business practices in connection with the requesting consumer. This disclosure right includes the right to request disclosure of: (1) The categories of personal information the Company has collected about the consumer; (2) The categories of sources from which the Company collects the personal information; (3) The business or commercial purpose for collecting or selling the personal information; (4) The categories of third parties with

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- whom the Company shares personal information; and, (5) The specific pieces of personal information the Company collects about the consumer upon request.
- The right to request a copy of the specific personal information collected by the Company about the consumer during the 12-months preceding the consumer's request. For purposes of this Privacy Policy, this right is referred to as the "Request to Know."
  - The right to have such information deleted, subject to certain exceptions. For purposes of this Privacy Policy, this right is referred to as the "Request to Delete."
  - The right to request that the personal information collected by the Company not be sold to third parties, if applicable. For purposes of this Privacy Policy, this right is referred to as the "Request to Opt-Out."
  - The right to not be discriminated against by the Company because the consumer exercised any right granted to the consumer by the CCPA.

These rights, however, are subject to limitation.

- If a consumer shares with the Company the consumer's personal information in the following capacities and the information is used by the Company solely within the context of the consumer acting in such capacity, then the Consumer, pursuant to the CCPA, does not have the right to "Request to Know," "Request to Delete," or the "Request to Opt-Out" with respect to such information:
  - Personal information that is collected by the Company about a consumer in the course of the consumer acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of the Company.
  - Personal information that is collected by the Company about a consumer that is the emergency contact information of a consumer who acts as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of the Company.
  - Personal information that is collected by the Company about a consumer that is necessary for the Company to retain to administer benefits for another consumer who acts as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of the Company.
- The rights summarized above shall not apply to a consumer who shares personal information with the Company in a transaction between the Company and the consumer, where the consumer acts as an employee, owner, director, officer, or contractor of another company, partnership, sole proprietorship, non-profit, or government agency and the transaction occurs in the context of the Company conducting due diligence regarding, providing, or receiving a product or service to or from the consumer who acts as an employee, owner, director, officer, or contractor of another company, partnership, sole proprietorship, non-profit, or government agency.

## **IV. Contact for More Information**

If you have any questions or concerns about the Company's privacy policies and practices, you can contact Nicole Janeczek at (856) 209-7416.