

**Helena Agri-Enterprises, LLC**  
**California Applicant, Employee, and Independent Contractor Privacy Notice**

*Effective Date: January 1, 2023*

**1. Purpose of this Notice.** This Applicant, Employee, and Independent Contractor Privacy Notice (“Notice”) is provided to disclose the types of personal information that may be processed by Helena Agri-Enterprises, LLC, (collectively with subsidiaries that are directly or indirectly controlled by or under common control of Helena Agri-Enterprises, LLC, “Company” or “we”) as part of the application process (for an “Applicant”), or supporting Company employees or independent contractors (collectively, a “Workforce Member”) at the Company. This Notice shall only apply to Workforce Members who are California residents.

**2. Personal Information We Collect and Process.** Listed below are the categories of personal information that the Company or its designees may process about Applicants or Workforce Members, as applicable and indicated.

- **Direct and Indirect Identifiers**, including, but not limited to, first and last name, alias, date of birth, postal address, unique personal identifiers, email, account name, Social Security number, biometric data (including pictures and fingerprints), driver’s license number, passport number, or other similar identifiers. In this context, a “unique personal identifier” means a persistent identifier that can be used to individually identify an Applicant or Workforce Member, or a device that is linked to a Workforce Member, including, but not limited to, a device identifier; an Internet Protocol address; cookies, beacons, pixel tags, or similar technology; unique pseudonym or user alias; telephone numbers; or other forms of persistent or likely direct or indirect identifiers.
- **Protected or Sensitive Classifications Under Applicable Law**, including, but not limited to, race, skin color, nationality, religion, sex/gender (includes pregnancy, childbirth, breastfeeding and/ or related medical conditions), marital status and number of children, medical condition, health information, disability status, military or veteran status, request for family care leave, request for leave for a Workforce Member’s own serious health condition, request for pregnancy disability leave, and age.
- **Electronic Network Activity Information & Internet Use at the Company**, including, but not limited to, Workforce Member browsing history, search history, interaction with a website or online resource from a Company-owned device, geolocation data related to fleet management (this may include location data of Company owned, leased or rented vehicles), geolocation data related to use of an internet website from a Company-owned device, and physical access to a Company office location, facility, or plant.
- **Professional or Employment-related Information**, including, but not limited to, job-related data, maintained as part of the current or past employment relationship that is present in: a job application or resume; education records, an employment contract; a contractor agreement; a performance review; photos; information from Workforce Member expenses; payroll and benefits related data; internal and external contact information; or information captured from video, audio, systems, or other forms of monitoring or surveillance.

**3. Purposes for Collecting Personal Information.** The Company may collect the categories of personal information described above for the following purposes.

- **Hiring Workforce Members**, including, but not limited to, recruiting, conducting employment-related background screening and checks and interviews, and processing applications and qualification materials.
- **Paying or Providing Benefits**, including, but not limited to, salary administration, payroll management, payment of expenses, to administer other compensation, medical and dental and retirement benefits, including recording and processing eligibility of dependents, absence and leave monitoring, insurance

and accident management, and provision of online information and statements.

- **Supporting our Workforce Members**, including, but not limited to, providing Workforce Member data maintenance and support services, administration of separation of employment, approvals and authorization procedures, administration and handling of Workforce Member claims, travel administration, as well as performance appraisals, disciplinary records, career planning, skills monitoring, job moves, promotions, and staff re-structuring.
- **Maintaining Contact Information**, including, but not limited to, altering contact details across relevant entities within the Company (for example, personal contact information, other employment information, and transferring roles).
- **Assistance in the Case of Emergency**, including, but not limited to, maintenance of contact details for Workforce Members, and any dependents in the case of a personal or business emergency.
- **Conducting Health-Related Services**, including, but not limited to and as applicable, conducting pre-employment and employment-related medical screenings for return to work purposes; determining medical suitability for particular tasks; providing health related benefits; and identifying health needs of Workforce Members to plan and provide appropriate services.
- **Providing a Better, Safer and More Efficient Working Environment**, which includes, and is not limited to, conducting surveys of Workforce Members, providing senior management information about other Workforce Members, and conducting training.
- **Maintaining Security on the Company Information Resources and Systems**, which includes, but is not limited to, hosting and maintenance of computer systems and infrastructure; management of the Company's software and hardware computer assets; and monitoring email and Internet access.
- **Complying with Applicable Law or Regulatory Requirements**, such as legal (state and federal) and internal company reporting obligations, including but not limited to headcount, management information, demographic and health, safety, and environmental reporting, as well as assessing and monitoring eligibility to work in the U.S., such as through the use of the I-9 verification process and use of required documents.

**4. Updates and Changes.** The Company will not collect additional categories of personal information or use personal information already collected for additional purposes without providing you with a notice of such changes. Any changes to this Notice will be effective from the date they are communicated to you, including providing an updated Notice on our Website at: <https://www.helenaagri.com/privacy/>.

**5. Your California Consumer Rights; Further Information.** For more information on how Company processes personal information and what rights you have under applicable California law, please see Company's Privacy Policy and California Disclosure at: <https://www.helenaagri.com/privacy/>. If you have any questions about this Notice or Company policies governing personal information, please contact us at [privacypolicy@helenaagri.com](mailto:privacypolicy@helenaagri.com).