

TEMECULA CREEK INN EMPLOYEE/APPLICANT PRIVACY NOTICE

About this Privacy Notice

This Privacy Notice is provided by Temecula Creek Inn, in accordance with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws, and all terms defined in the CCPA have the same meaning when used herein. This Privacy Notice applies solely to employees of and applicants for employment with Temecula Creek Inn who reside in the State of California.

The purpose of this Privacy Notice is to inform you about the categories of your Personal Information we collect, and the purposes for which we use such Personal Information. ***Please be advised that we do not sell your Personal Information.***

Categories of Your Personal Information That We Collect

We may collect and process the following categories of Personal Information about you (please note that a piece of Personal Information may belong in multiple categories):

- **Identifiers.** A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.
- **Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).** A name, signature, Social Security number, physical characteristic or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.
- **Protected classification characteristics under California or federal law.** Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, or genetic information (including familial genetic information).
- **Professional or employment-related information.** Current or past personnel information, including information related to recruitment and hiring, job history, references, licensing, contact details, background checks, drug testing, positions held, contracts or agreements, compensation, benefits, leaves, disabilities or medical conditions, accommodations, payroll (including bank account numbers for direct deposit), tax details, garnishments, performance, attendance, discipline, and work assigned and performed.
- **Information that you provide to us or one of our affiliates.** Information that you give to us by filling in forms or communicating with us, whether face-to-face, by phone, by e-mail or otherwise through the recruitment process and during your employment with us. This

information may include your date and place of birth, nationality, mobile telephone number, next of kin, emergency contact details, tax details and your date of hire and references.

- **Information we collect or generate about you.** Including:
 - Professional or employment-related information as described above;
 - Photographs for identification badges and other official work purposes;
 - Information about your entitlement to work in the US;
 - Information we collect through your use of our email system (including but not limited to your full name, email address, and the content, date, and time of your email correspondence);
 - Information, such as browser history, collected through your use of our information technology system or our computers, mobile devices, or networks;
 - Information that we may collect through regulatory filings; and,
 - Information obtained through an exit interview with you (upon your departure from our organization), including your reasons for leaving.
- **Information we obtain from other sources.** Including:
 - Background screening reports;
 - Drug test results;
 - Medical information;
 - Garnishments and other legal documents; and
 - Information about your qualifications, skills, experience, licenses, and employment history from references, former employers, regulatory authorities or public sources.

Personal Information does not include your personal information that has been deidentified, pseudonymized, anonymized, aggregated, and/or otherwise processed so as to be unidentifiable in such a way that the data can no longer be attributed to you (by reasonable means) without the use of additional information, and where such additional information is kept separate and under adequate security to prevent unauthorized re-identification of you such that one could not, using reasonable efforts, link such information back to you (“**De-Identified Personal Information**”).

Purposes for Which We Use Your Personal Information

Your Personal Information may be used, processed, stored, or disclosed by us in the following ways and for the following purposes:

- To meet our legal and compliance obligations as an employer, and to perform our obligations and exercise our rights under your employment relationship with us. For example, we use your Personal Information to pay you, to evaluate your individual performance and to provide benefits in connection with your employment;
- For purposes of occupational health, and to make decisions regarding your fitness for work
- To meet our, and our affiliate's, legal and compliance obligations, including obligations to regulators or other legal or governmental authorities;
- To establish, exercise, or defend our legal rights or for the purpose of legal or regulatory proceedings;
- In connection with an emergency, or for business continuity purposes including tests of the system (private contact details you provided to us for emergency purposes only will only be used for such purposes);
- To enable the effective operation of our information technology resources, and to ensure they are used in accordance with our policies and procedures;
- To provide information to your prospective or future employers, consistent with applicable law; and
- As necessitated by our legitimate business interests (or the legitimate business interests of one or more of our affiliates), for example:
 - To effectively and efficiently administer and manage the operation of our business;
 - To ensure a consistent approach to the management of our employees and the employees of our affiliated companies;
 - To maintain compliance with applicable policies and procedures; or
 - To contact you or your family in the event of an emergency.

Disclosure of Your Personal Information to Third Parties

We may share your personal information with third parties outside of our company for the following purposes:

- To service providers, third party agents and contractors for the purposes of providing services to us, including, but not limited to, payroll service providers, insurance providers, employee benefits providers, background screening service providers, IT and communications providers, law firms, accountants, auditors, and corporate credit card providers, among others. These third party service providers will be subject to confidentiality requirements, and they will be contractually obligated to use any Personal Information we disclose to them or which they obtain from us solely to perform services to us or for their internal business use, but no other use;

- If we are acquired by a third party, in which case the Personal Information held by us about you will be disclosed to the third party buyer;
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred; and,
- To the extent required by law, for example if we are under a duty to disclose your Personal Information in order to comply with any legal obligation, or to establish, exercise, or defend our legal rights.

Retention of Personal Information

We retain your Personal Information for various periods of time based on the following criteria, as applicable:

- The purpose for which we are using your Personal Information – we will need to keep the data for as long as necessary to achieve that purpose;
- The applicable company retention policy; and/or,
- Legal obligations – we must retain your personal information per laws or regulations which may set a minimum retention period.

We will use commercially reasonable physical, electronic, and procedural safeguards to protect your Personal Information from loss, misuse, and unauthorized access, disclosure, alteration, and destruction in accordance with applicable law. Note that despite our best efforts, no data security measures can fully guarantee security all of the time.

Changes to Our Privacy Notice

We reserve the right to amend this Privacy Notice at our discretion and at any time. When we make changes to this Privacy Notice, we will notify you in writing.

Contacting Us

If you would like further information on information provided above, please contact the Human Resources Department.

Effective Date: January 1, 2020