

# **Job Applicant Privacy Policy**

## **OVERVIEW**

E. & J. Gallo Winery and its subsidiaries (“Gallo”, “we”, “our” or “us” or the “Company”) respects individual privacy and takes the privacy of your Personal Information seriously. Gallo collects, processes and discloses your Personal Information in connection with your application for a working relationship with us in a manner consistent with the laws of the states and countries in which we do business. Gallo uses your Personal Information in a manner that is consistent with the uses described in this Privacy Policy (the “Policy”), which covers the treatment of the Personal Information we receive or maintain about you.

This Policy applies to the Personal Information we receive or maintain regarding all current and former job applicants and potential candidates for employment. It does not apply to our employees, contractors, suppliers, distributors, trade contracts, or customers, or other personal data that Gallo collects for other purposes. As used in this Policy, “personal data” means information that identifies job applicants and potential candidates for employment with us, either submitted as part of the online application or through alternative channels (e.g., via professional recruiting firms).

## **YOUR CONSENT**

By providing us with your personal data, you acknowledge that you have read and understood this Policy and agree to the collection, use, and disclosure of your personal data as described herein. You also agree that we may communicate with you via email, telephone, or other means regarding our website, your use of it, and your interest in employment with us. If you no longer want us to use your contact information to communicate with you for recruitment purposes, let us know by contacting us through your account via our site or by following the instructions in various communications that we may send you.

## **INFORMATION COLLECTION AND USE**

We collect personal data directly from you when you apply for a position or otherwise engage with us through our website, including your name, address, contact information, education and skills, and employment history. We may also collect personal data about you from third parties, such as professional recruiting firms, your references, prior employers, employees with whom you have interviewed, and employment background check providers, to the extent permitted by applicable law. We use your personal data for legitimate human resources and business management reasons, including: identifying and evaluating candidates for potential employment, as well as for future roles that may become available; recordkeeping in relation to recruiting and hiring; ensuring compliance with legal requirements; protecting our legal rights to the extent authorized or permitted by law; or emergency situations where the health or safety of one or more individuals may be endangered. We may also analyze your personal data or aggregated/ pseudonymized data to improve our recruitment and hiring process. We will not collect or use personal data for any purpose other than that indicated in this Policy.

## **DISCLOSURE OF INFORMATION**

Your personal data may be accessed by our recruiters and interviewers. Individuals performing administrative functions and IT personnel may also have a limited access to your personal data to perform their jobs. We also share your personal data with service providers that may assist us in recruiting talent, administering and evaluating pre-employment screening, and improving our recruiting practices. Our website also offers online chat features that are supported by third-party service providers – when you use these features, your information may be processed by a service provider that is subject to confidentiality obligations which limit the use and disclosure of your personal data. We maintain processes designed to ensure that any processing of personal data by third-party service providers is consistent with this Policy and protects the confidentiality, availability, and integrity of your personal data. We will disclose your

personal data to governmental authorities, or other third parties when required by law. In addition, we may disclose or transfer your personal data in the event of a reorganization, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of our business.

The recipients of these disclosures of your personal data may be located in other jurisdictions that might not provide a level of protection equivalent to the laws in your jurisdiction. By submitting personal data to us, you consent to the transfer of such personal data outside your jurisdiction.

## **ONLINE CHAT**

If you have questions about your job application, you can ask our chat bot, Sophia. Sophia can also help facilitate the submission of job applications. Sophia is powered by a vendor that provides services on our behalf. When you use Sophia, we and our vendor collect any information you choose to enter into the chat in order to provide and improve the service.

## **DATA RETENTION**

If you accept an offer of employment by us, any relevant personal data collected during your pre-employment period will become part of your personnel records and will be retained in accordance with law and the terms of your employment. If we do not employ you, we may nevertheless continue to retain and use your personal data for a period of time for system administration purposes, to consider you for potential future roles, and to perform research. Thereafter, we retain a minimum amount of your personal data to record your recruiting activity with us.

## **SECURITY MEASURES & DATA PROTECTION**

We take appropriate technical and organizational security measures to protect personal data from loss, misuse, unauthorized access, disclosure, or alteration. Please keep in mind, however, that there is no such thing as perfect security, and no Internet transmission is ever completely secure or error-free. Moreover, you are responsible for maintaining the confidentiality of any username and password you use, if applicable.

## **CONTACT US**

If you have questions related to this Policy or our information practices, please contact us at:

Phone: **1-888-295-0247**

Email: [dataprivacy@ejgallo.com](mailto:dataprivacy@ejgallo.com)

Postal address: E. & J. Gallo Winery, Consumer Engagement, 600 Yosemite Blvd., Modesto, CA 95354

## **PRIVACY NOTICE FOR CALIFORNIA APPLICANTS**

As a supplement to the information provided above, Gallo provides this Privacy Notice for California Applicants (“Notice”) to explain what Personal Information we collect about California applicants, why we collect it, how we use and share it, and the rights you have relating to your Personal Information under the California Consumer Privacy Act (the “CCPA”).

As used in this Notice, the term “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include information that is publicly available, de-identified, or aggregated. When we process deidentified data, we will maintain and use the data in deidentified form and not attempt to reidentify the data except as required or permitted by law.

**I. How and Why We Collect Your Personal Information**

Generally, we collect Personal Information about job applicants as follows:

Category of Personal Information	Categories of Sources	Purposes for Collection / Use
<p><b>Identifiers</b> including real name, alias, postal address, unique personal identifier, online identifier, IP address, email address, account name</p>	<p>Directly from you</p> <p>Automatically when you use our website</p> <p>From service providers that help us to run our business</p> <p>From third parties</p>	<p>To open and maintain your application records</p> <p>To assess your eligibility for employment</p> <p>To communicate with you regarding your application</p> <p>To comply with applicable laws and regulations</p> <p>To manage the security of our property and systems</p> <p>To detect and prevent fraud against you and/or us</p>
<p><b>Personal Information described in Cal. Civ. Code § 1798.80(e)</b>, including your name, signature, address, telephone number, education, employment, and employment history</p>	<p>Directly from you</p> <p>From service providers that help us to run our business</p> <p>From third parties</p>	<p>To open and maintain your application records</p> <p>To assess your eligibility for employment</p> <p>To communicate with you regarding your application</p> <p>To comply with applicable laws and regulations</p> <p>To manage the security of our property and systems</p> <p>To detect and prevent fraud against you and/or us</p>
<p><b>Characteristics of protected classifications</b> under California or federal law, including, race, ancestry, ethnic origin, sex, gender, gender identity, military or veteran status, disability</p>	<p>Directly from you</p> <p>From service providers that help us to run our business</p> <p>From third parties</p>	<p>To comply with applicable laws and regulations</p>
<p><b>Audio, electronic, visual, thermal, olfactory, or similar information</b>, including closed-circuit images, photographs and video of you, and audio recordings as may relate to your application</p>	<p>Directly from you</p> <p>Automatically while you are on Company property</p>	<p>To manage the security of our property and systems</p> <p>To carry out video interviews</p>

<p><b>Professional or employment-related information</b>, including:</p> <p>Skills, qualifications, work experience, references, recommendations, and other information included in a resume, CV, application form, or cover letter;</p> <p>Answers to behavioral or other screening questions in an application or interview;</p> <p>Writing samples, design portfolios, and other documents shared with us during the application process;</p> <p>Information relating to professional licenses, training, disciplinary actions, and membership in professional organizations;</p> <p>Information relating to membership in civic organizations</p>	<p>Directly from you</p> <p>From service providers that help us to run our business</p> <p>From third parties</p>	<p>To open and maintain your application records</p> <p>To assess your eligibility for employment</p> <p>To comply with applicable laws and regulations</p> <p>To detect and prevent fraud against you and/or us</p>
<p><b>Inferences</b> reflecting preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes</p>	<p>Derived from the other categories of Personal Information we collect</p>	<p>To assess your eligibility for employment</p>

Among the information we collect about applicants are the following categories of Sensitive Personal Information:

<p><b>Category of Sensitive Personal Information</b></p>	<p><b>Categories of Sources</b></p>	<p><b>Purposes for Collection / Use</b></p>
<p>Account log-in, in combination with any required security or access code, password, or credentials allowing access to an account</p>	<p>Directly from you</p>	<p>To open and maintain your application records</p> <p>To manage the security of our property and systems</p> <p>To detect and prevent fraud against you and/or us</p>
<p>Personal Information that reveals a consumer's racial or ethnic origin</p>	<p>Directly from you</p> <p>From service providers that help us to run our business</p> <p>From third parties</p>	<p>To comply with applicable laws and regulations</p>

We do not use or disclose Sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA.

## **II. How Long We Keep Your Personal Information**

We keep the categories of Personal Information described above for as long as necessary or permitted for the purposes described in this Notice or otherwise authorized by law. This generally means holding the information for as long as one of the following apply:

- Your Personal Information is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information;
- Your Personal Information is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the Personal Information was collected;
- The Personal Information is reasonably necessary to protect or defend our rights or property (which will generally relate to applicable laws that limit actions in a particular case); or
- We are otherwise required or permitted to keep your information by applicable laws or regulations.

Where information is used for more than one purpose, we will retain it until the purpose with the latest period expires.

## **III. Disclosures of California Applicant Personal Information**

We may disclose any of the categories of Personal Information we collect to our service providers and contractors for business or commercial purposes aligned with the purposes for which we collect it. This includes disclosures to:

- Our brands and affiliated companies;
- Service providers that we use to support our business and operations. These vendors assist us with:
  - Performing services (including processing, maintaining, or collecting Personal Information) on our behalf (e.g., providing communications, technical, analytical, web hosting, cloud hosting and application support, among other services)
  - Ensuring security and integrity of Personal Information
  - Debugging to identify and repair errors that impair existing intended functionality
  - Providing advertising or marketing services on our behalf
  - Undertaking internal research for technological development and demonstration
  - Undertaking activities to verify or maintain the quality or safety of our services
  - To comply with applicable laws and regulations
  - For safety and security
  - Detecting, protecting against, or addressing malicious, deceptive, fraudulent, or illegal activity
  - Otherwise processing, maintaining, or collecting Personal Information on our behalf
- Government entities where necessary to comply with applicable laws and regulations.

Within the preceding 12 months, we have not sold or shared for cross-context behavioral advertising the Personal Information of California residents that we collect in relation to applications for employment at Gallo. If you also interact with us as a consumer, please review our consumer [Privacy Policy](#) for more information about our practices in that context. We do not have actual knowledge that we sell or share the Personal Information of consumers under 18 years of age.

## **IV. Submitting Requests Relating to Your Personal Information**

If you are a resident of California, you have the right to submit certain requests relating to your Personal Information as described below. To exercise any of these rights, please submit a request through our

[Contact Us](#) webform on this site, via email at [dataprivacy@ejgallo.com](mailto:dataprivacy@ejgallo.com) or call us at **1-888-295-0247**. Please note that, if you submit a request to know, request to delete or request to correct, you will be asked to provide Personal Information that we will match against our records to verify your identity. You may designate an authorized agent to make a request on your behalf; however, you will still need to verify your identity directly with us before your request can be processed. An authorized agent may submit a request on your behalf using the webform or toll-free number listed above. We will not retaliate against you if you choose to exercise any of your privacy rights under the CCPA.

**Right to Know.** You have the right to know what Personal Information we have collected about you, which includes:

- The categories of Personal Information we have collected about you, including
  - The categories of sources from which the Personal Information was collected
  - Our business or commercial purposes for collecting or disclosing Personal Information
  - The categories of recipients to which we disclose Personal Information
  - The categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of service providers and contractors to which we disclosed that particular category of Personal Information
- The specific pieces of Personal Information we have collected about you

**Right to Delete Your Personal Information.** You have the right to request that we delete Personal Information we collected from you, subject to certain exceptions. Where we use deidentification to satisfy a deletion request, we commit to maintaining and using the information in deidentified form and will not attempt to reidentify the information.

**Right to Correct Inaccurate Information.** If you believe that Personal Information we maintain about you is inaccurate, you have the right to request that we correct that information.

## **V. Contact Us**

If you have any questions about how we handle your Personal Information or if you need to access this Notice in an alternative format or language, please contact us at:

Phone: 1-888-295-0247

Email: [dataprivacy@ejgallo.com](mailto:dataprivacy@ejgallo.com)

Postal address: E. & J. Gallo Winery, Consumer Engagement, 600 Yosemite Blvd., Modesto, CA 95354

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