

J. Lohr Privacy Notice for California Residents

Personnel & Job Applicants

This Privacy Notice for California Residents (Personnel & Job Applicants) (“CCPA Notice of Collection”) applies to California residents who are job applicants and personnel, including employees and independent contractors (collectively, “Consumers” or “you”) of J. Lohr Vineyards, Inc., J. Lohr Winery Corporation or their affiliates (“J. Lohr”, “we”, “us”). We have created this CCPA Notice of Collection to provide you with additional information about our collection (both online and offline) and use of your Personal Information for employment purposes in order to comply with the California Consumer Privacy Act of 2018 and the California Privacy Rights Act (“CCPA”).

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device as specifically defined in the CCPA (“Personal Information”). We collect Personal Information relating to pre-hire documents and decisions – for example, in job applications, resumes and interview notes. We also collect Personal Information relating to your employment or contractor relationship with us – for example, information contained in your personnel file, and in payroll, health insurance, workers’ compensation and training records. Certain Personal Information is also considered “Sensitive Information.”

In particular, within the last twelve (12) months, J. Lohr may have collected the following categories of Personal Information in the employment context and used the Personal Information for the following business purposes:

Category	Examples	Business Purpose(s)
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email addresses, Social Security number, driver’s license number, government-issued identification card or number, or photograph.	<p>To fulfill or meet the reason you provided the information.</p> <p>To comply with state and federal law requiring employers to maintain certain records.</p> <p>To effectively process payroll and administer direct deposit.</p> <p>To administer and maintain group health insurance benefits, retirement plans and workers’ compensation claims.</p>

Category	Examples	Business Purpose(s)
		<p>To manage employee performance of their job duties.</p> <p>To ensure physical accessibility to, and security of, our premises.</p> <p>To evaluate your job application or resume for an open position.</p> <p>To process your requests for information.</p> <p>To display your photo in a company directory (online and offline, including our public website), and other materials, such as resumes distributed at seminars.</p> <p>To have emergency contacts on hand for you.</p> <p>To enable access to our phone system</p> <p>To ensure your dietary requirements are met and allergies and similar restrictions are addressed, at events and venues</p> <p>To help maintain the safety, security, and integrity of our company, services, databases and other technology assets, data and business.</p> <p>To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of J. Lohr's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in</p>

Category	Examples	Business Purpose(s)
		<p>which Personal Information held by J. Lohr is among the assets transferred.</p> <p>To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</p> <p>As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.</p>
<p>B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))</p>	<p>A name, signature, Social Security number, address, telephone number, passport number, driver’s license, government-issued 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.</p>	<p>To fulfill or meet the reason you provided the information.</p> <p>To comply with state and federal law requiring employers to maintain certain records.</p> <p>To effectively process payroll and administer direct deposit.</p> <p>To administer and maintain group health insurance benefits, retirement plans and workers’ compensation claims.</p> <p>To manage employee performance of their job duties.</p> <p>To ensure physical accessibility to, and security of, our premises.</p> <p>To evaluate your job application or resume for an open position.</p> <p>To process your requests for information.</p>

Category	Examples	Business Purpose(s)
		<p>To have emergency contacts on hand for you.</p> <p>To enable access to our phone system</p> <p>To ensure your dietary requirements are met and allergies and similar restrictions are addressed, at events and venues</p> <p>To help maintain the safety, security, and integrity of our company, services, databases and other technology assets, data and business.</p> <p>To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of J. Lohr's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by J. Lohr is among the assets transferred.</p> <p>To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</p> <p>As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.</p>

<p>C. Protected classification characteristics under California or federal law</p>	<p>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.</p>	<p>To fulfill or meet the reason you provided the information.</p> <p>To comply with state and federal law requiring employers to maintain certain records.</p> <p>To effectively process payroll and administer direct deposit.</p> <p>To administer and maintain group health insurance benefits, retirement plans and workers' compensation claims.</p> <p>To manage employee performance of their job duties.</p> <p>To ensure physical accessibility to, and security of, our premises.</p> <p>To have emergency contacts on hand for you.</p> <p>To ensure your dietary requirements are met and allergies and similar restrictions are addressed, at events and venues.</p> <p>To help maintain the safety, security, and integrity of our company, services, databases and other technology assets, data and business.</p> <p>To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of J. Lohr's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in</p>
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		<p>which Personal Information held by J. Lohr is among the assets transferred.</p> <p>To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</p> <p>As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.</p>
<p>F. Internet or other similar network activity</p>	<p>Browsing history, search history, information on a consumer’s interaction with a website, if available on a company-provided device.</p>	<p>To fulfill or meet the reason you provided the information.</p> <p>To evaluate your job application or resume for an open position.</p> <p>To enable access to our phone system.</p> <p>To help maintain the safety, security, and integrity of our company, services, databases and other technology assets, data and business.</p> <p>To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of J. Lohr’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by J. Lohr is among the assets transferred.</p> <p>To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</p>

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		<p>As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.</p>
<p>G. Geolocation data</p>	<p>Physical location or movements in certain circumstances, such as building access.</p>	<p>To fulfill or meet the reason you provided the information.</p> <p>To effectively process payroll and administer direct deposit.</p> <p>To administer and maintain group health insurance benefits, retirement plans and workers' compensation claims.</p> <p>To manage employee performance of their job duties.</p> <p>To ensure physical accessibility to, and security of, our premises.</p> <p>To help maintain the safety, security, and integrity of our company, services, databases and other technology assets, data and business.</p> <p>To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of J. Lohr's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by J. Lohr is among the assets transferred.</p> <p>To respond to law enforcement requests and as required by applicable</p>

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		<p>law, court order, or governmental regulations.</p> <p>As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.</p>
<p>H. Sensory data</p>	<p>Audio, electronic, visual (including photographs) or similar information.</p>	<p>To fulfill or meet the reason you provided the information.</p> <p>To manage employee performance of their job duties.</p> <p>To ensure physical accessibility to, and security of, our premises.</p> <p>To display your photo in a company directory (online and offline, including our public website), and other materials, such as resumes distributed at seminars.</p> <p>To help maintain the safety, security, and integrity of our company, services, databases and other technology assets, data and business.</p> <p>To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of J. Lohr’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by J. Lohr is among the assets transferred.</p> <p>To respond to law enforcement requests and as required by applicable</p>

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		<p>law, court order, or governmental regulations.</p> <p>As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.</p>
<p>I. Professional or Employment-related information</p>	<p>Employment history</p>	<p>To fulfill or meet the reason you provided the information.</p> <p>To manage employee performance of their job duties.</p> <p>To evaluate your job application or resume for an open position.</p> <p>To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of J. Lohr’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by J. Lohr is among the assets transferred.</p> <p>To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</p> <p>As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.</p>
<p>J. Non-public education information (per the Family Educational Rights and</p>	<p>Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student</p>	<p>To fulfill or meet the reason you provided the information.</p> <p>To manage employee performance of their job duties.</p>

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Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	schedules and student identification codes.	<p>To evaluate your job application or resume for an open position.</p> <p>To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of J. Lohr's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by J. Lohr is among the assets transferred.</p> <p>To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</p> <p>As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.</p>

Category	Examples	Business Purpose(s)
<p>K. Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences</p>	<p>Employee evaluations, records.</p>	<p>To fulfill or meet the reason you provided the information.</p> <p>To manage employee performance of their job duties.</p> <p>To ensure physical accessibility to, and security of, our premises.</p> <p>To evaluate your job application or resume for an open position.</p> <p>To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of J. Lohr's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by J. Lohr is among the assets transferred.</p> <p>To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.</p> <p>As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.</p>

In particular, within the last twelve (12) months, J. Lohr may have collected the following categories of Sensitive Information from you for the following business purposes:

Sensitive Personal Information Category	Business Purpose
<p>Government identifiers (social security, driver's license, state identification card, or passport number)</p>	<p>To administer payroll, provide tax filings and forms, enroll and administer health and welfare benefits, conduct employment eligibility verification and enroll and administer retirement plans.</p>

Racial or ethnic origin	For EEO-1 reporting purposes of voluntary self-identification form at new hire orientation.
Mail, email, or text messages contents not directed to us	All emails sent to and from the firm's email domain are stored and archived.
Biometric fingerprints	Time clock management and tracking.
Financial account information	To manage payroll and direct deposit.

Personal Information does not include:

- Publicly available information from government records
- Deidentified or aggregated consumer information
- Certain information already covered by other laws and regulations.

J. Lohr will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated or incompatible purposes without providing you notice.

J. Lohr obtains the categories of Personal Information listed above directly and indirectly:

- Directly from you – for example, when you submit a job application or your resume to J. Lohr or when you sign up for benefits and payroll
- Indirectly – for example, through the use of cookies.

Disclosure

J. Lohr may disclose information to authorized service providers that assist us with employment matters. For example, we use service providers for the following employment related services:

- Payroll processing
- Accounting and banking
- Human resource services
- Training providers
- Event venue providers
- Insurance benefits and retirement benefits
- IT support, email service providers, e-signature solutions

In addition to the services providers above, any information we collect, including Personal Information, may be disclosed to our affiliated entities within our corporate family as well as to certain third parties. For example, we may disclose your Personal Information as part of any actual or potential merger, acquisition, debt financing, sale of company assets, or similar transaction, or in the event of insolvency, bankruptcy or receivership in which Personal Information could be transferred to third parties as one of our business assets.

We may also disclose Personal Information about you to any competent law enforcement body, regulatory, government agency, court or other third party if we believe that doing so is legally required or is necessary to protect our property or other legal rights (including but not limited to enforcement of our agreements or the rights of others).

We do not sell the Personal Information we collect or share it with third parties for cross-context behavioral advertising. Thus, we do not provide the ability to opt-out of such sales or sharing.

Your Rights

If you are a California resident, you may have certain rights. California law may permit you to request that we:

-Provide you the categories of Personal Information we have collected or disclosed about you in the last twelve months; the categories of sources of such information; the business or commercial purpose for collecting or selling your Personal Information; and the categories of third parties with whom we shared Personal Information.

-Provide access to and/or a copy of certain information we hold about you.

-Delete certain information we have about you.

-Have incorrect information corrected about you.

- Limit the use and disclosure of Sensitive Personal Information. However, we do not use Sensitive Personal Information outside of a Business Purpose. As such, we are not obligated to fulfill a request to limit our use and disclosure of Sensitive Personal Information.

You also have the right to not be discriminated against (as provided for in applicable law) for exercising certain of your rights.

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable request related to your Personal Information. You will be required to verify your identity before we fulfill any request. To designate an authorized agent to make a request on your behalf, you must provide us with written authorization or a power of attorney, signed by you, for the agent to act on your behalf. You will still need to verify your identity directly with us.

Certain information may be exempt from such requests under applicable law. For instance, we may deny your deletion request if retaining the information is necessary for us or our service provider(s) for certain reasons as permitted and set forth in the CCPA, such as to continue to administer our personnel relationship with you.

If you would like to exercise any of these rights, please submit a request by contacting us.

We endeavor to respond to a verifiable request within forty-five (45) days of its receipt. If we require more time (up to ninety (90) days), we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the 12-month period preceding our receipt of the verifiable request. If applicable, the response we provide will also explain the reasons we cannot comply with a request. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Retention

Your Personal Information is processed for the period necessary to fulfill the purposes for which it is collected, to comply with legal and regulatory obligations and for the duration of any period necessary to establish, exercise or defend any legal rights.

In order to determine the most appropriate retention periods for your Personal Information, we consider the amount, nature and sensitivity of your Personal Information, the reasons for which we collect and process your Personal Information, best practices, and applicable legal requirements. When we have no ongoing legitimate business need or specific obligation to process your Personal Information, we will either delete or anonymize it (see below) or, if this is not possible (for example, because your Personal Information has been stored in backup archives), we will securely store your Personal Information and isolate it from any further processing. Some exceptions from static retention periods may occur. For instance, we cannot delete Personal Information when there are legal obligations to retain it (e.g., arising from tax or commercial law). Additionally, we cannot delete Personal Information when it is needed for the establishment, exercise or defense of legal claims (“litigation hold”). In this case, the Personal Information can be retained as long as needed for exercising respective potential legal claims.

In some instances, we may choose to anonymize your Personal Information instead of deleting it, for statistical use, for instance. When we choose to anonymize, we implement measures so there is no way that the Personal Information can be linked back to you or any specific individual.

Contact Information

If you have any questions or comments about this notice, the ways in which J. Lohr collects and uses your information in the employment context (and in our website’s Privacy Notice for all other

information not covered hereunder), or your choices and rights regarding such use, please do not hesitate to contact us at:

Phone: 408.288.5057

Email: HR@jlohr.com

Postal Address: J. Lohr Vineyards & Wines, 1000 Lenzen Ave, San Jose, CA 95126

Effective: January 1, 2023