

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 (“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.

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

Category	Examples
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.
B. Personal Information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	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.
C. 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.

Category	Examples
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, if available on a company-provided device.
G. Geolocation data	Physical location or movements in certain circumstances, such as building access.
H. Sensory data	Audio, electronic, visual (including photographs) or similar information.
I. Professional or Employment-related information	Employment history
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))	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 schedules and student identification codes.
K. Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences	Employee evaluations, records.

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 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.

Use of Personal Information

We may use, or disclose the Personal Information we collect for one or more of the following business purposes:

Business Purpose	Categories of Personal Information
To fulfill or meet the reason you provided the information.	A, B, C, F, G, H, I, J, K
To comply with state and federal law requiring employers to maintain certain records.	A, B, C
To effectively process payroll and administer direct deposit.	A, B, G
To administer and maintain group health insurance benefits, retirement plans and workers' compensation claims.	A, B, C, G
To manage employee performance of their job duties.	A, B, C, G, H, I, J, K
To ensure physical accessibility to, and security of, our premises.	A, B, C, G, H, K
To evaluate your job application or resume for an open position.	A, B, F, I, J, K
To process your requests for information.	A, B

Business Purpose	Categories of Personal Information
To display your photo in a company directory (online and offline, including our public website), and other materials, such as resumes distributed at seminars.	A, G, H
To have emergency contacts on hand for you.	A, B, C
To enable access to our phone system	A, B, F
To ensure your dietary requirements are met and allergies and similar restrictions are addressed, at events and venues	A, B, C
To help maintain the safety, security, and integrity of our company, services, databases and other technology assets, data and business.	A, B, C, F, G, H
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.	Any of the categories listed above, as may be required
To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.	Any of the categories listed above, as may be required
As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.	Any of the categories listed above which J. Lohr collects

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.

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

J. Lohr may also disclose information:

- To government agencies, as required by law or legal order or obligation or to exercise or defend legal claims, as allowed by the CCPA
- To our affiliates
- If J. Lohr or all or substantially all of its business or assets are acquired by a third party, in which case, personal information would be one of the transferred assets

J. Lohr does not sell personal information within the meaning of the CCPA.

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, 2020