

Sargento Foods Inc. Privacy Notice for California Residents

Effective Date: January 1, 2022

Last Updated: June 14, 2023

This **Privacy Notice for California Residents** supplements the information contained in Sargento Foods Inc.'s ("Sargento") [Privacy Policy](#) and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). This notice will govern in the event of a conflict with the Privacy Policy. We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) as amended by the Consumer Privacy Rights Act of 2020 (CPRPA) (hereafter collectively the "CCPA") and any terms defined in the CCPA have the same meaning when used in this notice.

This Privacy Notice does not apply to workforce-related personal information collected from California-based employees, job applicants, or similar individuals. Please see the [Privacy Notice for California Applicants and Employees](#) [[hyperlink](#)].

Information We Collect

Depending on the degree of your interaction with Sargento, our website collects information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household ("**personal information**"). Sargento obtains personal information from the following categories of sources:

- Directly from you. For example, from our Site Registration/Account Creation form or Contact Us.
- Indirectly from you. For example, from observing your actions on our Website.

Sargento may collect, use, share or sell the personal information it collects. Sargento has collected the following categories of personal information from its consumers within the last twelve (12) months:

Category	Collected	Shared	Sold
A. Identifiers. A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name.	YES	YES	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) including name, address, telephone number.	YES	YES	YES
C. Protected classification characteristics under California or federal law such as 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	NO	N/A	N/A

status, genetic information (including familial genetic information).			
D. Commercial information. Products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES	YES	YES
E. Biometric information. Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO	N/A	N/A
F. Internet or other similar network activity. Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	YES	YES
G. Geolocation data. Physical location.	YES	YES	YES
H. Sensory data. Audio, electronic, visual, thermal, olfactory, or similar information.	YES	NO	NO
I. Professional or employment-related information. Current or past job history or performance evaluations.	NO	N/A	N/A
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, student identification codes, student financial information, or student disciplinary records.	NO	N/A	N/A
K. Inferences drawn from other personal information. Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES	YES	YES
L. Sensitive Personal Information. ID numbers (SSN, driver's license, state ID, passport), account details (e.g. log-in credentials), location data (precise geolocation), diversity data (race, ethnicity, religion, union status), mail content (mail, email, text messages), DNA info, geological data (e.g. biometric info)	NO	N/A	N/A

Personal information does not include:

- Publicly available information from government records or made available to the general public by the Consumer or from widely distributed media.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

How We Use Personal Information

Sharing and Sales for Targeted Advertising

We may share or sell your personal information we collect for the purpose of cross-context behavioral advertising (also known as targeted advertising). Our personal information sharing does not include information about individuals we know are under age 16. You always have the right to, among other things, opt out of such sharing and sales (*see Personal Information Sales and Sharing Opt-Out and Opt-In Rights*)

Use for Business Purpose

We may use or share the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our products, we will use that personal information to respond to your inquiry. We may also save your information to track your inquiry.
- To provide, support, personalize, and develop our Website, products, and services.
- To create, maintain, customize, and secure your account with us.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses. Please note this includes the possibility of creating audio records of your phone conversations with our customer affairs team. We will always notify you prior to beginning any such recording.
- To personalize your Website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers and ads through our Website and third-party sites.

- To help maintain the safety, security, and integrity of our Website, products, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website and products.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Sargento Foods Inc. assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Sargento Foods Inc. about our Website users is among the assets transferred.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

Use for Commercial Purpose

We may use or share the personal information we collect in order to inform you off new products, promotions, and content related to Sargento if you sign up for our Monthly Email Newsletter, Special Promotional Offers, or Sweepstakes and Contents.

Sargento Foods Inc. 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.

How Long We Keep Your Personal Information

We keep your Personal Information for as long as needed or permitted according to the purpose(s) for which it was obtained. In general, Sargento’s minimum retention period is fifteen (15) years. However, the final criteria used to determine our retention periods include (i) the length of the relationship with you; (ii) as required to meet our legal obligations; and (iii) as advised by our legal counsel considering such matters as applicable complaints, statutes of limitations, litigation, or regulatory requirements. We may remove Personal Information from our database at any time and without providing any reason.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that Sargento disclose certain information to you about our collection and use of your personal information (the “right to know”). Once we receive your

request and confirm your identity (see *Exercising Access, Data Portability, Correction, and Deletion Rights*), we will disclose to you:

- The specific pieces of personal information we collected about you (also called a data portability request).
- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share or sell that personal information.
- If we sold or shared your personal information for a business purpose, a list disclosing the personal information categories that each category of recipient obtained and the specific pieces of personal information we collected about you (also called a data portability request).

Correction Rights

You have the right to request that Sargento correct any inaccurate personal information that we collected from you. Once we receive your request and confirm your identity (see *Exercising Access, Data Portability, Correction, and Deletion Rights*), we will correct your personal information, delete contested personal information and—and direct our service providers, contractors, and (to the extent reasonably possible) all other third parties with whom we have sold or shared your information to delete—to correct your personal information, unless an exception applies.

Deletion Request Rights

You have the right to request that Sargento delete any of your personal information that we collected from you and retained, subject to certain exceptions (the “right to delete”). Once we receive your request and confirm your identity (see *Exercising Access, Data Portability, Correction, and Deletion Rights*), we will delete—and direct our service providers, contractors, and (to the extent reasonably possible) all other third parties with whom we have sold or shared your information—to delete your personal information, unless an exception applies.

We may deny your deletion request to the extent that retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information or provide a good or service that you requested.
2. Conduct a product recall conducted in accordance with federal law.
3. Help to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities to the extent your personal information is reasonably necessary for such a purpose.
4. Debug products to identify and repair errors that impair existing intended functionality.

5. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
6. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq.*).
7. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
8. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us and compatible with the content in which you provided personal information.
9. Comply with a legal obligation.

Exercising Access, Data Portability, Correction, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 1-800-243-3737
- Visiting <https://www.sargento.com/contact-us> Emailing Ask_Us@sargento.com

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact 1-800-3737.

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

We will deliver our written response by mail or electronically, at your option.

The response we provide will explain the reasons we cannot comply with a request, if applicable. 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 consumer 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.

Personal Information Sales and Sharing Opt-Out and Opt-In Rights

If you are age 16 or older, you have the right to direct us to not sell or share your personal information at any time (the "right to opt-out"). We do not sell or share the personal information of consumers we actually know are less than 16 years old.

We will honor opt-out preference signals when as sales and sharing-opt our requests. Such opt-out preference signals must be in a common and recognized signal format. Additionally, you (or your authorized representative) may exercise the right to opt-out by submitting a request to us via the following Internet Web page link:

Do Not Sell or Share My Personal Information

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales or sharing. However, you may change your mind and opt back into personal information sales or sharing at any time by visiting the following Internet Web page link: **Opt-In to Selling or Sharing of My Personal Information**. We will only use personal information provided in an opt-out request to review and comply with the request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes to Our Privacy Notice

Sargento reserves the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. **Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.**

Contact Information

If you have any questions or comments about this notice, the ways in which Sargento collects and uses your personal information, your choices and rights regarding such use, are unable to access this policy or any portion thereof, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 1-800-243-3737

Email: Ask_Us@sargento.com

Postal Address:

SARGENTO FOODS INC.

Attn: Patrice Ruby/Consumer Affairs
One Persnickety Place
Plymouth, WI 53073