

**International Vitamin Corporation
California Employee/Applicant Privacy Policy and Disclosure Notice**

Effective Date: June 17, 2024

International Vitamin Corporation (“IVC,” “we,” or “us”) is committed to protecting the personal information of its employees, former employees, and prospective employees. If you are a California resident, California law provides you with certain rights pursuant to the California Consumer Privacy Act (“CCPA”) and the California Privacy Rights Act (“CPRA”). By providing you this Privacy Policy and Disclosure Notice, IVC outlines the rights of California residents who are employees, former employees, or candidates with regard to personal information that IVC may collect. Any terms defined in the CCPA or CPRA will have the same meaning when used in this notice. IVC also distributes a separate *Privacy Data Policy*, which all employees of IVC are required to review and comply with in connection with their employment.

Information IVC Collects and How IVC Uses Your Personal Information

Sources of Personal Information

Personal Information is collected directly from you when you:

- Apply for employment with IVC, including references, background checks, educational history, and job history.
- Submit employment eligibility information to IVC.
- Provide biographical information to IVC.
- Submit benefits information to IVC.
- Provide ADA eligibility and accommodation information to IVC.
- Have your photo taken for a security badge.
- Browse the Internet on IVC systems, which is monitored by IVC.

It is your responsibility to provide us with accurate data, and to provide us with updated Personal Information when it changes.

Categories of Personal Information

In accordance with California law, IVC collected the following categories of Personal Information within the preceding 12 months:

- Personal Identifiers and Personal Records: IVC collects contact information, including an employee’s name, home mailing address, telephone number, personal email address, date of birth, work authorization, and any other information necessary for IVC’s business purposes that employees voluntarily disclose during an application for, and continued

employment with IVC. IVC also collects and uses identifiers including, but not limited to Social Security Number (“SSN”), withholding, paycheck, and bank account direct deposit information in order to process and conduct payroll operations. IVC also collects and uses information from employees for employee benefit plan administration including name, date of birth, SSN, home address, and marital status of employees and enrolled family benefits and individuals designated as beneficiaries and change in status information for benefit plan administration.

- Protected Classification Characteristics: Some protected and sensitive categories of information may be collected such as sex, marital status, veteran status, age, race and disability as required for various employment law requirements.
- Biometric Information: We collect fingerprints, which we use to identify you, process payroll, and monitor time records.
- Internet or Other Electronic Network Activity Information: We review your digital footprint and monitor Internet activity. We use this information to ensure the security of our systems and identify any improper uses of company assets.
- Geolocation Data: We collect geolocation data through employee IP addresses. We use this information to facilitate secure remote access and protect our network.
- Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information: We collect photos for security badges. We use this information to ensure security in our facility.
- Professional or Employment-Related Information / Non-Public Education Information: Information collected during the interview and hiring process including contact information, certificates, degrees, licenses, professional background, and information from background checks.

IVC does not sell Personal Information of applicants or employees. IVC may share each of these categories of Personal Information with our service providers to the extent necessary to perform administrative services for IVC. Third parties will only process an employee’s Personal Information on the IVC’s instructions and where they have agreed to treat the Personal Information confidentially and to keep it secure. All such third parties are required to sign a contract including data protection clauses. In addition, Personal Information may be disclosed to authorities where required by applicable law, such as Regulatory Authorities and IRS/Tax Authorities. In such cases, IVC will endeavor to not disclose more Personal Information than is required under the circumstances.

Sensitive Personal Information

Sensitive Personal Information is a subcategory of Personal Information under California law and includes (a) an individual’s Social Security or other state identification number; (b) an individual’s account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; (c) an individual’s geolocation; (d) an individual’s racial or ethnic origin, religious or philosophical

beliefs, or union membership; (e) the contents of an individual's mail, email, or text messages, unless the business is the intended recipient of the communication; and (f) an individual's genetic data. It also includes processing of biometric information for purposes of identifying an individual, Personal Information collected and analyzed concerning an individual's health, and Personal Information collected and analyzed concerning an individual's sex life or sexual orientation. We will limit our collection of Sensitive Personal Information to only instances where absolutely necessary, and we will not use any such information to infer characteristics about you. We will only collect and use your biometric information with your consent.

Retention of Data

IVC will only retain your Personal Information for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. IVC may retain your Personal Information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

Security Standards

The information you provide to IVC is securely processed, stored, and maintained, and IVC maintains appropriate technical and organizational measures to ensure a level of security appropriate to the risks represented by the processing and the nature of the Personal Information to be protected.

Access to Information

Only authorized IVC personnel have access to your information, and those individuals are only allowed to use that information as part of the hiring process and for employment purposes including payroll and benefit plan administration and security. Any IVC employee who knowingly violates these policies is subject to disciplinary action, including the possibility of termination. IVC does not sell any employee information to third-party marketing companies. IVC has put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

California Data Subject Rights

The CCPA and CPRA provide California residents with specific rights regarding their personal information. This section describes your rights and explains how to exercise those rights.

The Right to Know or Correct

You have the right to request that IVC disclose certain information to you about our collection and use of your Personal Information over the past 12 months, which may include the following:

- the categories or specific pieces of Personal Information IVC collected about you;
- the categories of sources for the Personal Information IVC collected about you;

- the IVC’s business purpose for collecting that Personal Information;
- the categories of third parties with whom IVC shares that Personal Information;
- if IVC disclosed your Personal Information, information concerning disclosures of Personal Information for a business purpose, identifying the Personal Information categories that each category of recipient obtained.

You also have the right to request that IVC correct any Personal Information about you.

The Right to Delete

Subject to certain exceptions, you have the right to request that IVC delete your Personal Information that IVC collected from you and retained. Once IVC receives and confirms your request for deletion, IVC will delete (and direct our service providers to delete) your Personal Information from our records unless an exception applies. Notably, we will not be able to delete information required to facilitate employment, payroll records, tax records, or similar documents.

The Right to Opt Out

Subject to certain exceptions, you have the right to opt out of the IVC’s processing of your Sensitive Personal Information. Once IVC receives and confirms your request to opt out, we will cease the use and sharing of your Personal Information unless an exception applies. Notably, you will not be able to opt out of our using information required to facilitate employment, payroll records, tax records, or similar documents.

Exercising Your Rights

To exercise your rights described above, please submit a request to IVC by contacting IVC Human Resources at 949-664-5500.

You may only make a Right to Know or Right to Delete request twice within a 12-month period. Only you or an authorized representative may make a request related to your personal information.

Response Timing and Format

IVC endeavors to respond to a request within 45 days of its receipt. If IVC requires more time, we will inform you of the reason and the length of the extension in writing.

Contact Information

If you have any questions or comments about this Privacy Policy and Disclosure Notice, or the ways in which IVC collects and uses your information please contact IVC Human Resources at 949-664-5500.