

SSP America –Candidate Privacy Notice

Effective Date: August 21, 2023

This notice describes how SSP America, Inc. (“we,” “our,” or “us”) collects, uses and discloses personal information about job candidates in Canada and California.

Under the California Consumer Privacy Act (“CCPA”), we are required to provide any California resident who is our job applicant with a notice related to “personal information” we collect about you. This notice contains disclosures required by the CCPA and applies only to “personal information” that is subject to the CCPA or, with respect to Canadian job applicants, applicable Canadian privacy laws.

What personal information we collect, use and disclose

When you apply for a job with us, we collect personal information including your name, contact information (such as mailing address, phone number and/or email address), education, experience and history, skills and interests, availability, and any other information you voluntarily provide to us in your application, resume, cover letter, or similar document. We use all of this information to evaluate your qualifications and suitability for the desired position, process your application, and contact you for further information. We may also keep this information on file to consider you for future job opportunities or to otherwise meet legal or business requirements.

As part of the job application process, we may also collect personal information in the course of background verifications, including, but not limited to, a criminal background check, a job reference check, and verification of any information you have provided.

For California Residents: Categories of personal information we collect and disclose

In connection with your application for work with us, we will collect and disclose the following categories of personal information about our job applicants who are California residents:

- Personal and online identifiers (such as first and last name, Social Security number, driver’s license number, log-in credentials, email address, or unique online identifiers)
- Characteristics of protected classifications under California or federal law (such as race, sex, or gender)
- Internet or other electronic network activity information for online applicants (such as interactions with a website, email, or application)
- Sensory information (such as call or video recordings or audio, electronic, visual, thermal, olfactory, or similar information)
- Professional or employment-related information (such as your employment history and resume)
- Education information (such as your education history and transcripts)
- Other information about you that is linked to the personal information above.

Sensitive Personal Information. Some of the information that we collect may constitute “sensitive personal information” under the CCPA and other applicable privacy laws. We will obtain your consent to collect, use and disclose sensitive information where required by applicable law. For California residents, we do not use or disclose sensitive personal information for purposes other than those specified in the CCPA.

From what sources is personal information collected?

We may collect personal information about candidates from the following sources (with your consent where required by law):

- You, the candidate
- Recruitment agencies and vendors with which we have agreements
- Professional networking profile (e.g., your public LinkedIn profile)
- Employees and others who refer you to us
- Educational institutions
- Background check providers

To which third parties do we disclose personal information?

We may transfer or disclose the personal information we collect to the following categories of recipients:

- Service providers. We share the personal information we collect with our service providers, such as those who help us manage the application process or run our business, like our auditors.
- Recruiters. We may disclose personal information to recruiters, such as to convey the status of your application.
- Employment references. We may disclose personal information to references, such as to confirm the information you provided to us.
- Background check providers. As legally permitted, we may disclose personal information to background check providers to obtain a background check.
- Legal requirements. As legally required, we may disclose personal information in response to a lawful access request by US, Canadian or other foreign government entities, courts, or law enforcement agencies.

We do not sell the personal information we collect about job applicants or share such information for targeted advertising purposes.

Your personal information may be transferred outside of your jurisdiction and stored and processed by us and our service providers in the United States or other locations.

How do we use information about you?

We use and disclose the personal information we collect about you for our commercial and business purposes, sharing this information with the categories of recipients listed above. Our commercial and business purposes include, without limitation:

- Assessing your skills, qualifications, and suitability for the role.
- Carrying out background and reference checks, where applicable.
- Communicating with you about the recruitment process.
- Keeping records related to our hiring processes.
- Complying with legal or regulatory requirements.
- We also need to process your personal information to decide whether to enter into a contract of employment with you.
- For applicants in California, other business purposes as identified in the CCPA, which include:
 - Auditing related to our interactions with you;
 - Detecting and protecting against security incidents, fraud, and illegal activity;
 - Debugging;
 - Performing services (for us or our service provider) such as analytics;
 - Internal research for technological improvement;
 - Internal operations;
 - Activities to maintain and improve our business; and
 - Other one-time uses.

If you fail to provide personal information

If you fail to provide information when requested which we deem necessary for us to consider your application (such as evidence of qualifications or work history), we may not be able to process your application successfully and we may not be able to take your application further.

Data retention

If you are hired, SSP America will keep personal information about you for the duration of your employment with SSP America and as otherwise required by law.

If your application is not successful, we may retain and use your personal information for a fixed period (generally 12 months or as otherwise disclosed in communications with you at the time of application) in accordance with our record retention protocols in order to consider you for any suitable alternative roles where permitted by applicable law and/or for as long as necessary to comply with legal record retention requirements. When it is no longer necessary to process personal information for these purposes, we will destroy, erase, or anonymize this data.

Rights regarding personal information

If you are a California resident, you have certain rights under the CCPA related to personal information SSP America collects about you. You may be able to exercise the following rights, subject to certain exceptions and limitations:

- The **right to know** the categories and specific pieces of personal information we collect, use, and disclose about you, the categories of sources from which we collected personal information about you, our purposes for collecting or disclosing personal information, and the categories of third parties with which we have disclosed personal information.
- The **right to request that we delete** the personal information we have collected from you.
- The **right to correct** inaccurate personal information we maintain about you.
- The **right not to receive discriminatory treatment** for the exercise of the privacy rights conferred by the CCPA.

To exercise any of the above rights, please contact SSP America by using the following information and submitting the verifying information, as further described below:

- Online at "[Your Privacy Choices](#)."
- By phone at **1 (833) 777-2747**.

If you are a Canadian resident, subject to limited exceptions under applicable law, you have the right to access, update and correct inaccuracies in your personal information in our custody or control, and to obtain further information about how we use and disclose your personal information. You may also withdraw your consent to our collection, use and disclosure of your personal information, subject to legal and contractual restrictions.

You may exercise these rights by emailing or writing to us at the contact information set out below. We may request certain personal information for the purpose of verifying your identity so we can respond to your request.

Verification Process and Required Information. In some cases, we may need to request additional information from you to verify your identity or understand the scope of your request. Generally, we verify your identity by matching the information provided in your request with the information we maintain in our records. We will require you to provide, at a minimum, basic contact information, such as name and email address, or other information within our records that would allow us to verify your identity.

Authorized Agent. You may also designate an authorized agent to make requests on your behalf by designating such an agent in writing or through a power of attorney. We will require the agent to provide us with proof that you have authorized the agent to make requests on your behalf prior to accepting requests from the agent.

Your Rights as a Consumer. We may collect information about you that is unrelated to your application to our company, if you are a consumer of our services or visit our website. More information about our privacy practices and your rights as a consumer under applicable privacy laws can be found at our [Privacy Policy](#).

Contact Us. For questions or concerns about SSP America's practices, or about how your information is handled by us and our service providers, please contact our Privacy Officer at privacy@foodtravelexperts.com.