

SSP America – Candidate Privacy Notice

Effective Date: March 8, 2024

Last Updated: March 8, 2024

Under the California Consumer Privacy Act (“**CCPA**”), SSP America, Inc. (“**we**,” “**our**,” or “**us**”) is 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. This notice also contains information for job applicants from Canada. Please see the “**Candidates in Canada**” section below for additional information on how we collect, use and disclose personal information of job applicants in Canada.

Categories of personal information we collect and disclose of California residents

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 (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 described above may constitute “sensitive personal information” under the CCPA. We do not use or disclose sensitive personal information for purposes other than those specified in the CCPA.

See below for personal information that is collected from job applicants in Canada.

From what sources is personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate
- Recruitment agencies and vendors with which we have agreements
- Professional networking profile
- Employees and others who refer you to us
- Service providers
- Job-related social media companies
- Educational institutions
- Employment references
- Background check providers
- Airport security clearance authorities

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 disclose the personal information we collect to our service providers, such as those who help us manage the application process, as well as those who help us 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.
- As legally required, we may provide personal information to government entities.

We do not sell the personal information we collect about job applicants or share such information for targeted advertising purposes. However, our website uses cookies as described in our Privacy Policy available at [Privacy Policy](#).

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.
- 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 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. For candidates in California, when it is no longer necessary to process personal information for these purposes, we will deidentify, aggregate, or delete this data to the extent possible. For candidates in Canada, please see the “Candidates in Canada” section below.

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 1.877.777.2747

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. More information about our privacy practices and your rights as a consumer under state privacy laws can be found at our Privacy Policy.

If you are a Canadian resident, see “Candidates in Canada” section below.

Candidates in Canada

The following additional information applies to job applicants in Canada. Please note that when you apply for a job in Canada, SSP Canada Food Service Inc. collects your job applicant information may share it with local operating units that operate our restaurants and that act as hiring entities and direct employers, as necessary for the purposes set out in this [Privacy Policy](#).

If you have any questions or concerns about our collection, use or disclosure of job applicant personal information, including our use of service providers outside of your province or Canada, please contact our Privacy Manager at privacySSP@foodtravelexperts.com.

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, similar document or job interview. We use all of this information to evaluate your qualifications and suitability for the desired position, process your application, contact you for further information and for the purposes set out under “How do we use information about you” above and to send job alerts that you request to receive. We may also analyze information about our job applicants on an aggregated and non-identifiable basis to better understand our candidates.

We may also keep this information on file to consider you for future job opportunities or to otherwise meet legal or business requirements unless you tell us you do not want us to. We do not collect diversity data as part of the job application process in Canada.

While most personal information is collected directly from you through the online application process, we may also collect personal information through in-person or virtual job interviews, and through third parties such as professional networking sites such as LinkedIn, third party job sites such as Indeed, as well as background screening companies, job references, and airport security clearance authorities.

Which third parties do we share personal information with?

We may share your personal information with the categories of recipients set out under “*To which third parties do we disclose personal information?*” above, and as legally required, which may include in response to a lawful access request by Canadian, United States or other foreign government entities, courts or law enforcement agencies.

Your personal information may be transferred outside of your province or Canada and stored and processed by us and our service providers (including our affiliates) in the United States or other locations.

We may also share your personal information with our local subsidiaries who operate our restaurants, for example, if you apply for a position at a particular location or if we think a particular job may be of interest to you.

Rights Regarding Personal Information

Subject to limited exceptions under applicable law, you have the right to access, update, rectify 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 under “*Contact Us*” below, or online at “Your Privacy Choices”.

We may request certain personal information for the purpose of verifying your identity so we can respond to your request.

Contact Us. For questions or concerns about our privacy practices, please contact us as follows:

- For job applicants, contact us at privacySSP@foodtravelexperts.com.

- For consumers, passengers, and website visitors, our general Privacy Policy is here, and you may contact us at privacySSP@foodtravelexperts.com.