

**MOET HENNESSY USA, INC.**  
**NOTICE OF EMPLOYMENT PRIVACY PRACTICES**

Effective Date: July 1, 2020.

Moet Hennessy USA, Inc. (“Company”) provides this Privacy Notice for California Consumers (Employees) (the “CCPA Employee Privacy Notice” or “Notice”). The CCPA Employee Privacy Notice sets forth privacy practices as required by the California Consumer Privacy Act of 2018.

The CCPA Employee Privacy Notice applies only to individuals residing in the State of California who are considered “Consumers” under the CCPA and from whom we collect “Personal Information” as described in the CCPA (“Consumers”). We provide you this notice because under the CCPA, California Residents who are job applicants, employees, or contractors of a business qualify as Consumers. For purposes of this CCPA Employee Privacy Notice, when we refer to Consumers, we mean you to the extent you are a California employee, employee applicant, or contractor.

This notice does not address our treatment of certain of your personal information that is excluded from CCPA’s scope, including any protected health information that is regulated by the Health Insurance Portability and Accountability Act (“HIPAA”).

**Personal Information We Collect**

We may collect Personal Information from you in a variety of different situations, including, but not limited to on our website, your mobile device, through email, in physical locations, through the mail, in person, and/or over the telephone. More specifically, the Company may collect the following categories of Personal Information from California job applicants, employees, or contractors, and used it in the ways described in the “How We Use Personal Information” section below:

<b>Category:</b>	<b>Examples Include:</b>
<b>A. Identifiers.</b>	A real name, alias, postal address, unique personal identifier, email address, account name, Social Security number, driver's license or other government ID number, passport number, employee ID number, or other similar identifiers.
<b>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b>	A name, signature, Social Security number, address, telephone number, passport number, driver's license or state identification card, insurance policy number, education, employment, employment history, bank account number, medical information, or health insurance information.  Some personal information included in this category may overlap with other categories.
<b>C. Characteristics of protected</b>	Age, race, color, ancestry, national origin, immigration status, citizenship, marital status, medical condition, physical or mental

<b>classifications under California or federal law.</b>	disability, sex, gender, pregnancy or childbirth and related medical conditions, or veteran or military status.
<b>D. Audio, electronic, visual, or similar information.</b>	Pictures (e.g., photographs on government identification cards or photographs from social or business events or photographs taken for employee ID purposes), video conferences, video recordings (e.g., videos captured for security purposes),
<b>E. Professional or employment-related information.</b>	Current or past job history or performance evaluations, salary information, retirement fund information, compensation information, bonus information, benefits information, or stock option information.
<b>F. Education Information.</b>	Schools attended, degrees and certificates awarded or in process, vocational trainings and certifications, and transcript information.
<b>G. Internet or other electronic network activity information.</b>	Browsing history, search history, and information regarding an employee's interaction with an internet web site, application, or advertisement
<b>H. Geolocation data.</b>	Information collected through GPS technology.
<b>I. Inferences.</b>	We may include inferences drawn from any of the personal information identified in categories (A) through (I) in the records we keep about our employees. This personal information may include your preferences, characteristics, predispositions, behavior, attitudes, abilities, and aptitudes.

Personal Information does not include de-identified or aggregated consumer information.

The Company obtains the categories of Personal Information listed above from the following categories of sources:

- **Directly from you.** For example, we collect the personal information you provide to us in connection with your job application or application for benefits. We will also collect the personal information you provide to us throughout the duration of your employment with the Company.
- **From your beneficiaries and dependents.** For example, your beneficiaries and dependents may provide us with your personal information in the course of their receipt of benefits provided or administered by us.
- **From our service providers.** For example, we may collect your personal information from a service provider that conducts background checks for us. We may also receive your personal information from service providers who help us run our business, including payroll, software and travel management providers.
- **From benefits administrators.** For example, we may receive personal information about you from the companies that administer the benefits plans offered by the Company.
- **From third parties.** For example, a third-party recruiter may provide your personal information to us in connection with our search for an employee.
- **Automatically.** For example, we may automatically collect personal information from the computers and other devices that you use in the course of being an employee. We may also

collect such personal information from the electronic platforms we provide to you, including the Company's email, word processing, and "chat" platforms.

### **How We Use Personal Information**

We may use or disclose the Personal Information we collect from you or about you to do one or more of the following:

- To fulfill or meet the purpose for which you provided the information. For example, if you share your name and contact information to apply for a job or become an employee, we will use that personal information in connection with your employment or potential employment. To contact you and to inform you about benefits or information relating to your employment or potential employment.
- To provide, support, personalize, and develop our website and services relating to your employment or potential employment.
- To create, maintain, customize, and secure your information with us.
- To process your requests or transactions and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To help maintain the safety, security, and integrity of our systems, App or Website, services, databases and other technology assets, and business.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA or subsequently agreed to by you.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by the Company about our Consumers is among the assets transferred.

### **How We Share Personal Information**

The Company may disclose your Personal Information to a third party, including our service providers, for a business purpose.

We may disclose your Personal Information in the following ways:

- With our parent organization, subsidiaries and affiliates.
- On our online platforms. For example, this may include sharing pictures of you on our website and our social media pages.
- With our service providers and benefits administrators.
- With our auditors, actuaries, accountants, attorneys, governments or other third parties, as required or permitted by applicable law.
- As directed by you.
- To comply with the law or to protect our business. This includes responding to court orders or subpoenas, or defending the Company in a lawsuit. This may also include sharing your personal information if a government agency or investigatory body requests this data. We may share also your personal information when we are investigating a security incident, allegation, or a potential fraud or violation of law.

- With any successors to all or part of our business. For example, if we merge with, acquire or are acquired, or sell part of organization to another entity. This may include an asset sale, corporate reorganization or other change of control.
- As otherwise described to you when collecting your personal information or as otherwise set forth in or permitted the CCPA.

### **Changes to Our Notice**

The Company reserves the right to amend this Notice at our discretion and at any time. When we make changes to this Notice, we will update the Notice's effective date and make available the updated Notice as required by law.

### **Questions**

If you have any questions or comments about this Notice, the ways in which the Company collects, uses and shares your Personal Information, please contact Human Resources.