

## **Applicant Privacy Notice**

**Last Updated: January 2021**

You have expressed an interest in employment or internship opportunities with CB Neptune Holdings, LLC, CB Neptune Promotions, Inc, Neptune Retail Solutions (the “Company”, “we”, or “us”) operate in the United States and Canada. and/or one of their affiliated companies (each referred to as “Company”). This Applicant Privacy Notice (“Notice”) describes our practices regarding all the Personal Information that we collect from you and about you in connection with your application for such employment or internship opportunities. “Personal Information” means any information relating to, or reasonably capable of being associated with or linked to, an identified or identifiable individual or household. Personal Information submitted elsewhere to the Company and its affiliates for other purposes will be used in accordance with the privacy notices governing those offerings or activities.

### **INFORMATION WE COLLECT**

#### **Personal Information You Provide**

We may collect the following Personal Information to process your application, to comply with legal obligations and to pursue legitimate interests of the Company such as to transmit Personal Information within the Company for internal administrative purposes. We may collect the following Personal Information from you in connection with your application:

- Name, address, telephone number, email address, postal address, and other contact information;
- Online Company account(s) and corresponding username(s) and password(s);
- Work authorization status;
- CV, résumé, cover letter, previous work experience and education information;
- Skills;
- Professional and other work-related licenses, permits and certifications held;
- Information relating to references;
- Information related to payroll enrollment and other information related to the on-boarding process (if hired), including for criminal background checks where applicable (subject to applicable laws); and
- Any other information you elect to provide to us (e.g., employment preferences, willingness to relocate, prior and current salary and bonus, desired salary, awards or professional memberships, motor vehicle information and the existence of a disability should you require an accommodation in the application or interview process).

Your decision to apply for a position and to provide your Personal Information to us is voluntary. However, if you fail to provide sufficient information, the Company may be unable to consider your application.

Except when legally required, we ask that you avoid submitting sensitive Personal

Information such as race, color, sex, gender identity, sexual orientation, nationality, national origin, ethnic origin, religion, beliefs or creed, age, disability, marital status, veteran status, genetic information or any other information concerning a characteristic protected by applicable law.

To the extent that you disclose any such sensitive Personal Information in the course of the application process, you do so on a voluntary basis and expressly authorize the Company to handle such data for the purposes of your application. We encourage you to consider the security of the means by which you disclose such sensitive Personal Information before making any such disclosures.

If you provide us with Personal Information of a reference or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us.

### **Personal Information from Other Sources**

The Company may obtain Personal Information about you from your references in connection with your application or other means, as permitted by applicable law. If we need to conduct a background check about you during the hiring process, we will ensure that you are provided with separate notice regarding the scope and the consequences of such background check. We may also collect such personal data as may be publicly available on the internet or social media sites when permitted by applicable law.

### **Information Obtained by Automated Means**

We also may obtain certain information through automated means, such as cookies (including HTTP, HTML5 and cookies), web beacons, web server logs, JavaScript and similar technologies, including technologies designed to obtain information regarding your use of our Services, including neptuneretailsolutions.com. The information we obtain in this manner may include IP address, mobile device advertising ID, browser characteristics, device characteristics, operating system, language preferences, referring URLs, information on actions taken on the site, and dates and times you access or use the site.

A “cookie” is a file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. A “web beacon” also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server. Through these automated collection methods, we obtain “clickstream data,” which is a log of the links and other content on which a visitor clicks while browsing a website. As the visitor clicks through the website, a record of the action may be collected and stored.

We may link certain data elements obtained through automated means, such as your browser or device information, with other information we have obtained about you to let us know, for example, what search queries you may have run. Your browser may tell you how to be notified when you receive certain types of cookies or how to restrict or disable certain types of cookies. You also may be able to delete your cookies or adjust your cookie settings through your browser settings (Chrome, Safari, and Internet Explorer). Please note, however, that without cookies you may not be able to use all of the features of our services.

## **USE OF INFORMATION**

Your Personal Information will be used for the Company's U.S. and Canadian personnel recruitment, management and planning purposes, as permitted by local law, including:

- To process your application;
- To assess your capabilities and qualifications for a job;
- To conduct reference checks and confirm work authorization;
- To respond to your inquiries and communicate with you about your application, and to send you information regarding employment or internship opportunities and changes to our terms and policies;
- To comply with or monitor compliance with any applicable law or regulation; and
- To complete the on-boarding process if we offer you a position.

We do not use the Personal Information that you provide to make automated decisions with regard to your application. If we hire you, the Personal Information we collect in connection with your application may be incorporated into our human resources system and may be used to manage the new-hire process; any such information may become part of your employee file and may be used for other employment-related purposes.

To the extent permitted by applicable law, the Company may also use your Personal Information as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country or state of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

## **DISCLOSURE OF PERSONAL INFORMATION**

The Company may share Personal Information with its affiliates if it is aware of an open role at any such affiliate for which the Company believes you may be qualified. The Company will remain responsible for Personal Information that is jointly used with affiliates. We will make the information available only to personnel with a business need to know the information, including personnel in the recruiting, human resources and information technology departments, and in the department responsible for the position for which you are applying.

The Company may share Personal Information with our third-party service providers who provide services such as hosting and operating websites, recruiting assistance, background check processing, and similar services. The Company and its affiliates require service providers to protect the confidentiality and security of Personal Information and to ensure that Personal Information is processed only for the provision of services on behalf of the Company and its affiliates and in compliance with applicable law. Service providers are not authorized to use or disclose the Personal Information, except as necessary to perform services on our behalf or to comply with legal requirements.

The Company may transfer Personal Information to a third party in the event of any

reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

The Company also may share Personal Information as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country or state of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

## **DATA RETENTION**

We will retain Personal Information for the period necessary to complete the application or hiring process, unless a longer retention period is required or permitted by law. If you are not hired, we may also retain your Personal Information for the purpose of considering whether your skills are suitable for other opportunities within the Company and/or one or more of its affiliates. We may remove Personal Information for inactive accounts from our database, subject to any applicable legal or regulatory obligations. Furthermore, the Company may delete Personal Information about you (including your CV/résumé) from our database at any time and without providing any reason. Therefore, please retain your own copy of the Personal Information provided to us.

## **YOUR RIGHTS**

If you applied online, you may access, review, and change your Personal Information stored by logging in to the site updating and/or deleting the information. The updated profile will be used as the default the next time you apply for a job using your account online. To change Personal Information that you have already submitted for consideration for a specific position, please update your profile and resubmit your application for that position. We encourage you to promptly update your Personal Information if it changes or is inaccurate. Apart from information contained in your profile, you may request access to Personal Information we collect, or its modification or suppression, where permitted by applicable law.

For your protection, we may only implement requests with respect to the information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable. Please note that certain personal information may be exempt from such access, correction, or suppression rights pursuant to local data protection laws.

## **SECURITY**

We seek to use reasonable organizational, technical and administrative measures to protect personal information within our organization.

Do not send sensitive personal information to us via email. It is your sole responsibility to use the appropriate level of care whenever you communicate with us.

The Company hereby disclaims, to the fullest extent permitted by applicable laws, any liability for itself and its affiliates and contractors for any personal information we collect in connection with your application that is lost, misused, illegally accessed, disclosed, altered or destroyed or not timely delivered to us.

## **LINKS TO THIRD-PARTY WEBSITES**

This site may contain links to other websites. This Notice does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the site links. The inclusion of a link on the site does not imply endorsement of the linked site or service by the Company or our affiliates. We encourage you to read the legal notices posted on those sites, including their privacy notices.

## **DIVERSITY**

The Company is an equal opportunity employer, which means we do not unlawfully discriminate against applicants on the grounds of race, color, sex, gender identity, sexual orientation, nationality, national origin, ethnic origin, religion, beliefs or creed, age, disability, marital status, veteran status, genetic information or any other characteristic protected by applicable law in any area of recruitment. In some countries we ask for information on the ethnic origin, gender and disability of our applicants either for the purpose of monitoring equal opportunity or because we are required to do so by applicable law. If you have a disability that you believe impairs your ability to fully participate in the application process, we encourage you to indicate that and to identify what your impairment is, how it limits your ability to participate in the application process and what reasonable accommodation(s) you feel you need in order to fully participate.

## **CHANGES TO THE NOTICE**

We may in our sole discretion amend this Notice at any time in order to address future developments of the Company, or changes in industry or legal trends. We will post the revised Notice on the site. You can determine when the Notice was revised by referring to the “Last Updated” legend on the top of this Notice. Any changes will become effective upon the “Last Updated” date. By continuing to use the site and/or maintaining and not withdrawing your application following such changes, you will be deemed to have agreed to such changes. If you do not agree with the terms of this Notice, in whole or part, you can choose to not continue to use the site and/or may withdraw your application.

## **CONTACT US**

If you have questions, comments or requests, please feel free to contact Neptune Retail Solutions, 20 Westport Road, 1<sup>st</sup> Floor, Wilton, CT 06897 or email [kvogels@neptuneretailsolutions.com](mailto:kvogels@neptuneretailsolutions.com).