



## Legal Policy Associate and Contractor Privacy

**Last updated:** January 1, 2023

This policy applies to associates in the following divisions:

- UNFI
- Retail
- UNFI Canada

### Overview

This Associate and Contractor Privacy Policy (the “Privacy Policy”) contains the policies and procedures to be followed by United Natural Foods, Inc., including its present or future subsidiaries (the “Company”, “UNFI”, “we”, “us”, “our”) related to the collection and use of personal information of an applicant, an associate, a Company officer or director, or a contractor in the United States, (referred to this in Privacy Policy as the “Associate/Contractor”, “you”, “your”). Note: A Contractor is a non-associate who performs services for UNFI and is not employed by the Company. Certain sections of this privacy policy do not apply to Contractors.

UNFI wants you to understand how and why we collect “Personal Information,” which includes any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Associate/Contractor. Associates/Contractors should have no expectation of privacy when using UNFI provided technology or whenever accessing UNFI technology resources or information.

UNFI is committed to protecting the privacy of all of our Associates and Contractors, and we take administrative, technical, and physical safeguards to protect your Personal Information from unauthorized access, misuse, accidental loss, or alteration.

### Notice of Employee Monitoring

We may monitor telephonic and electronic conversations or transmissions, including e-mail and internet access, by employees and contractors conducted using our systems or devices. This includes use of systems, computers, telephones, and other devices provided or maintained by



the Company or by our service providers. We may also use tracking devices on vehicles used by employees. We may monitor these devices and services to ensure their safety, security, and efficiency, and to permit internal evaluations.

### **What Information Do We Collect?**

In the previous 12 months, UNFI may have collected various categories of Personal Information identified in the attached chart to administer the Associate/Contractor relationship, comply with legal obligations, facilitate communications and efficiency, provide benefits or to ensure the safety of Associates, Contractors, facilities and property.

### **Reasons for Collection**

#### **a. Administer the Employment/Contractor Relationship**

The Company needs to keep and process Personal Information for normal employment and contractor engagement purposes, including identifiers, personal information, protected classifications, and biometric information. The Personal Information we hold and process will be used for management and administrative uses and only shared with others who have a need-to-know such information. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, while you are working for us, and after your employment or contract has ended. This includes using Personal Information to enable us to comply with any legal requirements associated with an associate or contractor relationship, to administer payroll, to provide you with benefits, ensure your safety, comply with an employment or service contract, and to demonstrate our commitment to equal employment opportunity and fair employment practices.

#### **b. Compliance with Legal Obligations**

In certain situations, we may need to collect and process your Personal Information to comply with our legal obligations. This includes:

- Tracking demographic information to confirm compliance with equal opportunity and non-discrimination policies and requirements;



- Processing information relating to your health, which could include reasons for absence and doctor's reports and notes, in order to comply with our obligations under applicable employment and safety and health laws; and/or
- Processing information relevant to any alleged violations of the Code of Conduct or other Company policies necessary to investigate allegations and institute disciplinary action as is required.

c. Facilitate Communications and Efficiency

The Company uses various tools and platforms that allow Associates/Contractors to more easily communicate with each other and to more efficiently access and share various types of work product and schedules. Some tools may also allow Associates/Contractors to share information via social media or other channels, including information relating to job opportunities.

These tools and platforms may collect and share internally contact information and company profile pictures; log certain preferences and actions; collect your geolocation; and create user profiles that allow Associates/Contractors and UNFI to track their efficiency and performance.

d. Provide Benefits

UNFI offers Associates a variety of benefits, including benefits related to healthcare, retirement savings, and the ability to order goods and services directly from the Company. In doing so, the Company collects Personal Information such as identifiers, personal information, protected classifications, biometric data, geolocation data, and employment information. If Associates take advantage of other benefits, such as fitness-related benefits, the Company may also collect additional biometric and sensory information. When you participate in certain benefits programs, the Company may also generate a log of your activity, track internet and other network activity, and develop a user profile to provide those programs to you in a manner tailored to your preferences.

All benefits may not be available to all Associates, and the Company will only collect Personal Information to provide a benefit if the Associate is eligible for and enrolled in that benefit. Associates should take care to read the specific terms applicable to any particular mobile application or benefits program to understand the specific pieces of information collected.



e. Ensure the Safety of Associates, Contractors, Facilities, and Property

UNFI collects various categories of information to ensure the safety of associates, contractors, facilities and property. Some information, such as identifiers, personal information, protected classifications, and biometric information, help verify the identity of Associates/Contractors in specific facilities. Other categories of information, such as geolocation data and sensory data, may assist the Company with ensuring the security of facilities and Company vehicles.

**Retention and Disposal of Personal Information**

Any Personal Information collected by the Company will be retained by the Company during the period of active employment of the Associate or service relationship of the Contractor, as well as during the post-employment period only as long as the Personal Information is required to serve its original purpose or as directed by applicable legislation or regulation. Personal Information that is no longer needed for its stated purpose will be destroyed, erased, or made anonymous.

The Company will ensure that all practices and procedures relating to the disposal of Personal Information will respect the fundamental policy of confidentiality. All Personal Information disposal procedures, including the disposal of computerized data storage devices, will ensure the complete destruction of Personal Information so that there will be no risk of subsequent unauthorized disclosure of Personal Information.

**Updates to the Privacy Policy**

This Privacy Policy is subject to occasional revision, and if we make any material changes in the categories of information we collect or the reasons we collect that information, we will notify you by sending you an e-mail and/or by prominently posting notice of the changes. This Privacy Policy will also be posted to [www.mysupervalu.com](http://www.mysupervalu.com), and <http://intranet.unfi.com> and you can review or consult the Privacy Policy at any time.

The Company may be subject to certain laws and regulations relating to privacy and information security in more than one jurisdiction in which Associates/Contractors reside. If any term, covenant, condition, or provision of this Privacy Policy is held by a court of competent



jurisdiction to be invalid, void, or unenforceable, it is the intent of this Privacy Policy that the scope of the rights and obligations of the Privacy Policy be reduced only for the affected jurisdiction and only to the extent deemed necessary under the laws of the local jurisdiction to render the provision reasonable and enforceable and the remainder of the provisions of the Privacy Policy statement will in no way be affected, impaired, or invalidated as a result.

### **Contact us with Questions**

If you have questions regarding this Privacy Policy, please contact the Chief Privacy Officer, Kim Myrdahl at 952-828-4159, email [privacypolicy@unfi.com](mailto:privacypolicy@unfi.com), or contact the Ethics and Compliance Office at [ethics.compliance@unfi.com](mailto:ethics.compliance@unfi.com) or 952-828-4230.



**Addendum I: Notice to California Associates/Contractors**

This Notice to California Associates/Contractors (“**Addendum**”) applies to Associates/Contractors that are residents of the state of California. Words used in this Addendum shall be interpreted as defined by the California Consumer Privacy Act (“CCPA”), Cal. Civ. Code § 1798.100 *et seq.*, as amended by the California Privacy Rights Act (“CRPA”), and implementing regulations. If you are a California resident, you have certain rights with respect to the collection, use, transfer, and processing of your personal information. We reserve the right to limit these rights where permitted under applicable, including where your identity cannot reasonably be verified or to the extent your rights adversely affect the rights and freedoms of others.

**What Information Do We Collect?**

The below examples are illustrative examples from the CCPA and do not reflect the specific pieces of information we collect.

<u>Categories of Personal Information</u> <sup>1</sup>	<u>Examples of Data that May Be Collected</u>	<u>Reasons for Collection</u>	<u>Retention Period</u>
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	Administer the Associate/Contractor Relationship Comply with Legal Obligations Facilitate Communications and Efficiency Provide Benefits Ensure the Safety of Associates, Contractors, Facilities, and Property	As long as you are employed by UNFI and at a minimum of up to 6 years after last interaction with UNFI or as long as required by law.

<sup>1</sup> Categories of Personal Information are as defined in Cal. Civ. Code. § 1798.140(v) (effective Jan. 1, 2023).



<u>Categories of Personal Information<sup>1</sup></u>	<u>Examples of Data that May Be Collected</u>	<u>Reasons for Collection</u>	<u>Retention Period</u>
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some Personal Information included in this category may overlap with other categories.	Administer the Associate/Contractor Relationship Comply with Legal Obligations Facilitate Communications and Efficiency Provide Benefits Ensure the Safety of Associates, Contractors, Facilities, and Property	As long as you are employed by UNFI and at a minimum of up to 6 years after last interaction with UNFI or as long as required by law.

<u>Categories of Personal Information<sup>1</sup></u>	<u>Examples of Data that May Be Collected</u>	<u>Reasons for Collection</u>	<u>Retention Period</u>
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	Administer the Associate/Contractor Relationship Comply with Legal Obligations Facilitate Communications and Efficiency Provide Benefits Ensure the Safety of Associates, Contractors, Facilities, and Property	As long as you are employed by UNFI and at a minimum of up to 6 years after last interaction with UNFI or as long as required by law.
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Facilitate Communications and Efficiency Provide Benefits	As long as you are employed by UNFI and at a minimum of up to 6 years after last interaction with UNFI or as long as required by law.



<u>Categories of Personal Information</u> <sup>1</sup>	<u>Examples of Data that May Be Collected</u>	<u>Reasons for Collection</u>	<u>Retention Period</u>
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	Administer the Associate/Contractor Relationship Provide Benefits Ensure the Safety of Associates, Contractors, Facilities, and Property	As long as you are employed by UNFI and at a minimum of up to 3 years after last interaction with UNFI or as long as required by law.
F. Internet or other similar network activity.	Browsing history, search history, information on an associate’s interaction with a website, application, or advertisement.	Facilitate Communications and Efficiency Provide Benefits	As long as you are employed by UNFI and at a minimum of up to 6 years after last interaction with UNFI or as long as required by law.
G. Geolocation data.	Physical location or movements.	Facilitate Communications and Efficiency Provide Benefits Ensure the Safety of Associates, Contractors, Facilities, and Property	As long as you are employed by UNFI and at a minimum of up to 6 years after last interaction with UNFI or as long as required by law.

<b><u>Categories of Personal Information<sup>1</sup></u></b>	<b><u>Examples of Data that May Be Collected</u></b>	<b><u>Reasons for Collection</u></b>	<b><u>Retention Period</u></b>
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	Administer the Associate/Contractor Relationship Comply with Legal Obligations Facilitate Communications and Efficiency Provide Benefits Ensure the Safety of Associates, Contractors, Facilities, and Property	As long as you are employed by UNFI and at a minimum of up to 6 years after last interaction with UNFI or as long as required by law.
I. Professional or employment-related information.	Current or past job history or performance evaluations.	Administer the Associate/Contractor Relationship Comply with Legal Obligations Ensure the Safety of Associates, Contractors, Facilities, and Property	As long as you are employed by UNFI and at a minimum of up to 6 years after last interaction with UNFI or as long as required by law.
J. Non-Public Education Information	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student financial information, or student disciplinary records.	Administer the Associate/Contractor Relationship Comply with Legal Obligations	As long as you are employed by UNFI and at a minimum of up to 6 years after last interaction with UNFI or as long as required by law.

<u>Categories of Personal Information</u> <sup>1</sup>	<u>Examples of Data that May Be Collected</u>	<u>Reasons for Collection</u>	<u>Retention Period</u>
K. Inferences drawn of the associate.	Inferences drawn from Personal Information identified above to create a profile about an associate reflecting an associate’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Facilitate Communications and Efficiency Provide Benefits	As long as you are employed by UNFI and at a minimum of up to 6 years after last interaction with UNFI or as long as required by law.
L. Sensitive Personal Information	Biometric information processed for the purpose of uniquely identifying an associate, personal information collected and analyzed concerning an associate’s health, sex life, or sexual orientation.  Some Sensitive Personal Information included in this category may overlap with other categories.	Administer the Associate/Contractor Relationship Comply with Legal Obligations	As long as you are employed by UNFI and at a minimum of up to 6 years after last interaction with UNFI or as long as required by law.

## Individual Rights

If you are a California resident, you have certain rights related to our collection, use, disclosure, and sharing of information.

### a. Right to Know About Personal Information Collected, Disclosed, Shared, or Sold

You have the right to request that we disclose the personal information we collect, use, and disclose about you to third parties. There are two types of Rights to Know requests that you can make:



1. **Right to Know (Abbreviated Request):** If you make a Right to Know (Abbreviated Request), you will receive the following information about you:
  - a. Categories of personal information collected, sold, or shared;
  - b. Categories of sources from which personal information is collected;
  - c. Categories of third parties to whom the information is sold, shared or disclosed;
  - d. Business or commercial purpose for collecting, sharing, or selling personal information;
  - e. Categories of personal information disclosed for a business purpose and categories of persons to whom it was disclosed for a business purpose.
  
2. **Right to Know (Specific Pieces of Information Request):** If you make a Right to Know (Specific Pieces of Information Request), you will receive the following information about you:
  - a. Specific pieces of personal information collected about you.This information will be provided to you free of charge, unless we determine that your request is manifestly unfounded or excessive. You may request this information twice in a 12-month period.

There are certain exceptions to an associate’s Right to Know. We will state in our response if an exception applies.

**b. Right of Deletion**

You have the right to request that we and our service providers delete any personal information about you which we have collected from you upon receipt of a verifiable request. This right is subject to certain exceptions. We will state in our response if an exception applies.

**c. Right to Opt-Out of the Sale or Sharing of Personal Information**

You have the right to opt-out of the sale or sharing of your personal information by a business subject to certain laws and regulations.

For more information, please visit our [Do Not Sell or Share My Personal Information](#) Page.

**d. Right to Non-Discrimination**

You have the right not to receive discriminatory treatment for exercising the privacy rights conferred by California law. We will not discriminate against you because you exercised any of your privacy rights, including, but not limited to, by: denying goods or services to you; charging different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties; providing a different level of quality of goods or services to you; or suggesting that you will receive a



different price or rate for goods or services or a different level or quality of goods or services. We will also not retaliate against any employee, applicant for employment, or independent contractor for exercising their rights under the CCPA.

**e. Right of Correction**

If we maintain inaccurate personal information about you, then you have the right to request that we correct the inaccurate personal information upon receipt of a verifiable request. Taking into account the nature of the personal information and purposes of processing the personal information, you have the right to request that we correct inaccurate personal information about you, if applicable.

**f. Right to Limit Use and Disclosure of Sensitive Personal Information**

To the extent UNFI collects any Sensitive Personal Information, it only does so for the purposes specified in Section 7027 of the California Consumer Privacy Act Regulations.

**g. Submitting Requests**

You can submit your request by filling out the request form on the [UNFI Data Subject Access Request](#) portal, or by toll-free phone at 1-800-969-9688.

**h. Verifying Requests**

When we receive a request through one of the means described above, it must verify that the person requesting information or deletion is the California associate about whom the request relates in order to process the request. To verify a California associate's identity, we may request up to three pieces of personal information about you when you make a request to compare against our records. We may also request that you sign a declaration under the penalty of perjury from the associate whose personal information is the subject of the request.

Making a verifiable associate request does not require you to create an account with us. We will only use personal information provided in your request to verify your identity and will delete any information you provide after processing the request. We reserve the right to take additional steps as necessary to verify the identity of California associate where we have reason to believe a request is fraudulent.

**i. Authorized Agents**

You may choose a person or a business registered with the California Secretary of State that you authorize to act on your behalf to submit your requests ("Authorized Agent"). If you choose to use an Authorized Agent, we require that you provide the Authorized Agent with written permission to allow them to submit your request and that you verify your identity directly with us. Failure to do so may result in UNFI denying your request.