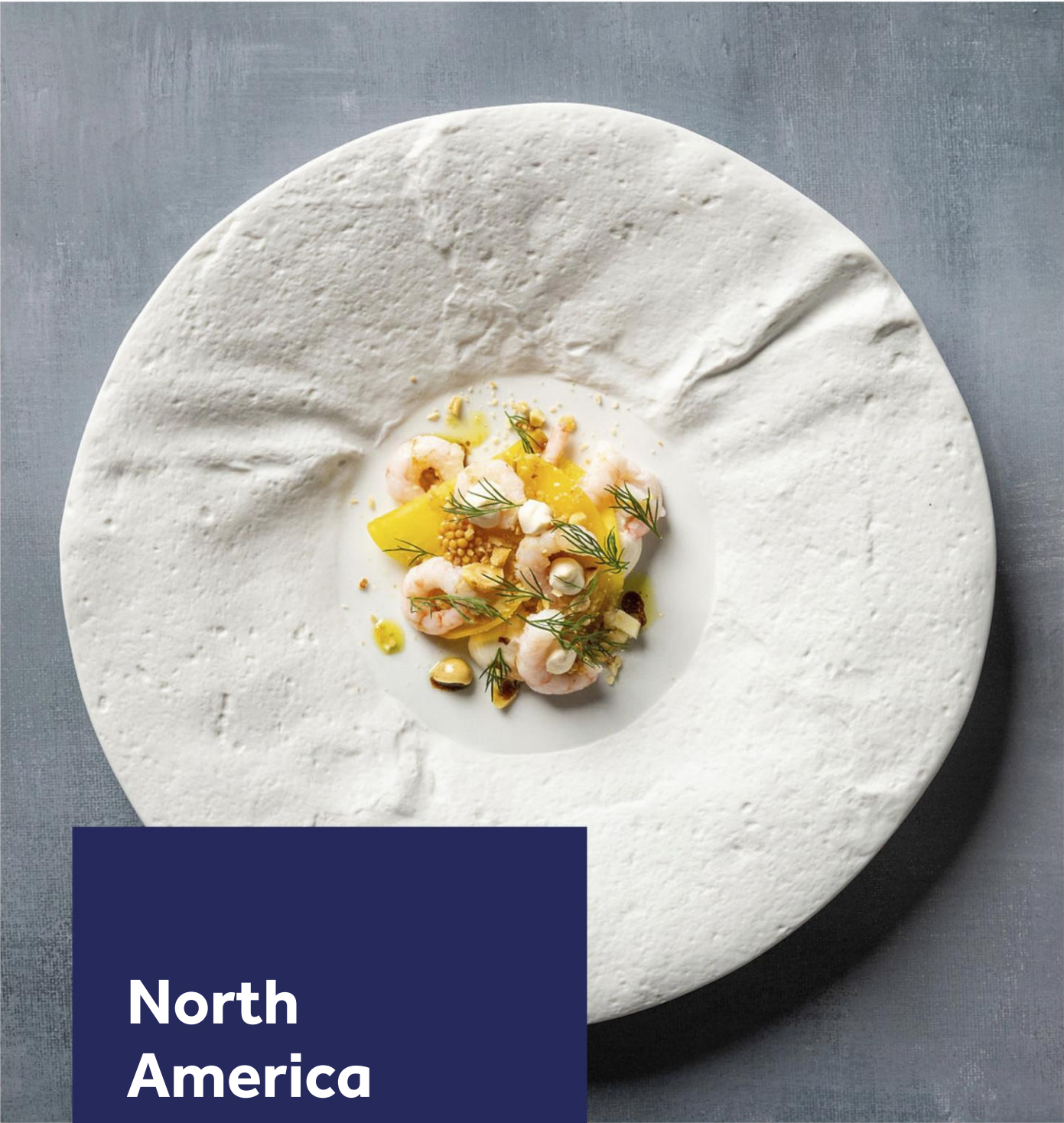




North America Applicant Privacy Notice

August 2026

gategroup

North America Applicant Privacy Notice

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1. Purpose

If you are a job applicant who resides in the United States ("U.S.") or Canada, this North American Applicant Privacy Notice (the "Notice") is being provided to you by Gate Gourmet, Inc., Gate Gourmet Canada Inc., and its corporate affiliates (collectively, "gategroup", "we", "us", or the "Company") to help you understand how we handle your Personal Information in the hiring process.

Assistance For Individuals Requiring Accommodation of a Disability

Alternative formats of this Notice are available to individuals who require accommodation. Please contact PrivacyNA@gategroup.com for assistance.

2. Scope

This Notice applies only to information collected for recruitment purposes through the gategroup Careers Site (the "Site") and from other sources. The Site is our centralized career application portal. Other sources might include, for example, prior employers, references, pre-employment screening providers, and educational institutions. This Notice does not apply to any other site or page that we own or operate. Our other sites and pages have their own privacy policies.

3. General Information

3.1. Personal Information We Collect About You

If you choose to apply for a position with us, the categories of Personal Information that we may collect about you through the Site and other sources are listed below, along with examples. Please remember that you are responsible for providing information that is accurate, complete and up to date when you disclose information to us during the application process.

• Identifiers: First and last name, postal address, telephone number, e-mail address, Internet Protocol ("IP") address, and signature.
• Professional or Employment-Related Information: Your resume, information about your employment history (e.g., dates of employment and last position held), educational history (e.g. degrees earned, certifications obtained), professional licenses and/or certifications, any information you disclose through LinkedIn and on other publicly available sites, and information received from background and reference checks.
• Internet or Other Similar Network Activity: Information regarding your interaction with the Site, including through the use of cookies. Please review our Site Privacy and Cookies

Policy to learn about the information we collect automatically using cookies when you visit the Site. If you visit our offices during the recruitment process and use our guest Wi-Fi, we may collect information about that use, such as type of device used and start/stop time. We also may collect information from your publicly available internet or social media content (other than LinkedIn and other professional networking sites).
• Non-Public Education Information: Non-public educational information, such as education verification through the background check process.
• Health-Related information: Medical information if the Company conducts pre-employment drug or alcohol testing (where permitted by law), if you request an accommodation in connection with the hiring process, or if required for your position (e.g., driver health card for roles requiring a commercial driver's license).
• Commercial Information: Transactional information, such as travel expense records for an in-person interview.
• Other Information Submitted with Your Online Application: Any Personal Information submitted as part of your online application, your eligibility to work in the country where you are applying, and your salary expectations.

Information About Protected Classification

When you apply for a position in the U.S., or indicate the U.S. as a preferred location when registering your profile, you will have the opportunity to provide information about your protected classification, i.e., gender, race/ethnic origin and/or veteran status in order for us to conduct equal opportunity monitoring. The provision of this information is entirely voluntary. If you decline to provide this information, your application(s) will not be affected in any way. If you do choose to provide this information, you consent to our using it for equal employment opportunity monitoring purposes. This information will not be used to evaluate your application for employment or to infer any characteristics about you.

Except as described above, we will not request or otherwise collect information about your health, race or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, or sexual orientation or your genetic information or biometric information through the on-line application or during the application process unless the law, as an exception, requires us to do so. We, or a third-party background check company under our direction, may check criminal history records for information about criminal convictions, but only if and to the extent permitted by applicable law.

3.2. Sources of Your Personal Information

We may collect the categories of Personal Information listed above from the following sources:

- **You**, for example, in your job application, forms you fill out for us, assessments you complete, surveys you complete, and any information you provide us during your application and interview process.
- **Vendors and service providers**, for example, recruiters.
- **Third parties**, for example, prior employers, job references, affiliated companies, professional employer organizations or staffing agencies.
- **Public internet sources**, for example, job-related social media platforms, job boards, public profiles, and other public online sources
- **Public records**, for example, court records, and credentialing and licensing organizations.
- **Automated technologies**, for example, on the Company's electronic resources to track logins and activity on the Company's careers page.
- **Surveillance/recording technologies installed by the Company**, for example, voicemail technologies, webcams, security cameras, and audio/video recording technologies with consent to the extent required by law
- **Government or administrative agencies**, for example, law enforcement.
- **Acquired company**, for example, if the Company acquired your employer, the Company might collect Personal Information from that employer

3.3. How We May Use Your Personal Information

We will use the information that we collect about you for purposes of the application process, including:

Recruiting

- To evaluate your qualifications or suitability for employment with the Company
- To communicate with you
- To check your references
- To conduct a pre-employment or criminal history background check
- For identification purposes
- For diversity and inclusion purposes where permitted by applicable law
- For recordkeeping purposes
- To demonstrate your agreement to, or acceptance of, documents presented to you (e.g., pre-employment arbitration agreement, acknowledgment of employment application, offer letter, etc.)
- To evaluate and improve the recruiting process
- To comply with our legal obligations and to defend against administrative charges or legal claims

If you visit our facilities

- To manage access to the facility and for security purposes
- To monitor your use of the corporate Internet access if you connect to our guest Wi-Fi during a visit to our offices

Some job postings allow you to choose to receive automated emails at the e-mail address you provided informing you of positions at the Company that may fit your profile. To stop receiving these emails at any time, you can click the “unsubscribe” link at the bottom of these emails. You may also choose to stop receiving these emails (or to begin receiving them if you had previously elected not to) by signing into the online application, selecting “My Account Options” at the top of the page, and then editing your preferences in the 'Correspondence' section of the “My Account” page.

If you are not hired for the position for which you initially applied, we may use the information that we collected about you through the recruiting process to evaluate your suitability for future job openings. Based on that evaluation, we may use your Personal Information to contact you to ask if you are interested in applying for new job openings.

3.4. How We May Disclose Your Personal Information

The Company will not sell, lease, or license your Personal Information to any third party. There are limited circumstances when the Company may disclose the Personal Information we collect about you to third parties, most notably:

- **Service Providers:** We may disclose the categories of Personal Information described in Section 3.1, above, to third-party service providers under written contract with the Company. We may, for example, retain a service provider to host all or portions of this Site, to help maintain and manage our databases, to assist in the recruiting process, or to conduct pre-employment screening. Service providers will be permitted to use your Personal Information only for the purpose(s) of providing the services for which your Personal Information was disclosed to the service provider and in accordance with the Company's instructions;
- **Corporate Affiliates:** With affiliated companies, such as grandparent, parent and/or subsidiary corporations, for their recruitment, recordkeeping and/or reporting purposes;
- **Required By Law:** When required by law, such as when we respond to subpoenas, court orders, legal process, or a discovery request in civil litigation;
- **Legal Violations:** If we believe that your actions violate applicable law, or threaten the rights, property, or safety of our Company, our users, or others;

- **Corporate Transactions:** If we sell some or all of our business, we may disclose all of the information that we have collected about you to a purchaser or, in due diligence, to a potential purchaser, but subject to a confidentiality agreement.

The Company will make such disclosures only as permitted by applicable data protection laws.

3.5. Retention of Your Personal Information

If the Company hires you, the information that you submitted through the online application and the information that we collected during the application process will become part of your personnel file if they are relevant to the ongoing employment relationship, and may be used to administer the employment relationship and for related reporting and recordkeeping purposes as described in the gategroup Privacy Notice for North American Employees. The Company will retain this information for the entire duration of your employment relationship with the Company and for the period thereafter identified in the Company's retention policy.

The Company will retain the information of applicants who are not hired for six months after your last activity in our system unless (a) the applicant indicates that we may maintain the information on file until the applicant asks to delete the information, or (b) a shorter or longer retention period is legally required. These records will be retained for our internal recordkeeping and reporting purposes. During that time, we may use your Personal Information to consider you for positions in addition to the position(s) for which you initially applied. If you wish to withdraw your application from consideration at any time during this retention period, you can do so by contacting us through the application portal.

3.6. Security For Your Personal Information

We want you to feel confident about providing your Personal Information through the online application page, so we have implemented a security program to keep information that is transmitted to our systems protected from unauthorized access. We use technical and organizational measures that provide a level of security appropriate to the nature of the Personal Information and the risks that are presented by processing your Personal Information. However, the security of information transmitted through the internet can never be guaranteed. You are responsible for maintaining the security of your password or other forms of authentication involved in accessing password-protected or secured resources. After we have received your information, access to it is limited to employees with a need to know.

3.7. How to Access, Correct, or Delete Personal Information in Your Account

You can access, update, correct or delete your account information and any information in your profile by visiting the online application page. If you would like to access the information that you

have submitted through the online application page; wish to request that we update, modify, or delete your information; or if you have any questions about this Notice, please contact PrivacyNA@gategroup.com.

4. Jurisdiction-Specific Information

4.1. California

This section applies only to job applicants who reside in the state of California in the U.S. ("California Applicants"). This section applies to Personal Information collected through the Site and in any other way, such as when California residents visit our offices.

4.1.1. California Notice at Collection

The Company collects the categories of Personal Information identified in Section 3.1, above, for the purposes identified in Section 3.3, above, and retains Personal Information for the period described in Section 3.5, above. We do not, and will not, sell your Personal Information or disclose it to third parties for cross-context behavioral advertising. We also do not collect or process sensitive Personal Information for the purpose of inferring characteristics about you.

4.1.2. Your California Privacy Rights

Subject to applicable exceptions, California Applicants have the following rights under the California Privacy Rights Act ("CPRA"):

- **Right to Know:** You have the right to submit a verifiable request for specific pieces of your Personal Information obtained from you and for information about the Company's collection, use, and disclosure of categories of your Personal Information.
- **Right to Delete:** You have the right to submit a verifiable request to delete Personal Information that you have provided to the Company or the Company has otherwise collected about you.
- **Right to Correct:** You have the right to submit a verifiable request to correct inaccurate Personal Information about you maintained by the Company, taking into account the nature of the Personal Information and the purposes of processing the Personal Information.

4.1.3. Non-Discrimination

The Company will not unlawfully discriminate against you for exercising your privacy rights under the California Privacy Rights Act.

4.1.4. How to Exercise Your California Privacy Rights

The Company will respond to requests to know, delete, and correct Personal Information in accordance with applicable law if it can verify the identity of the requestor. You can exercise these rights in the following ways:

- Call 1 (855) 844-4283
- Email: PrivacyNA@gategroup.com
- Complete the request form available at <https://www.gategroup.com/california-consumer-privacy-act>.

4.1.5. How We Will Verify Your Request

We will match the Personal Information that you provide us against the Personal Information we maintain in our files. The more risk entailed by the request (e.g., a request for specific pieces of Personal Information), the more items of Personal Information we may request to verify your identity. If we cannot verify your identity to a sufficient level of certainty to respond securely to your request, we will let you know promptly and explain why we cannot verify your identity.

4.1.6. Authorized Agent

If an authorized agent submits a request to know, correct, or delete on your behalf, the authorized agent must submit with the request a document signed by you that authorizes the authorized agent to submit the request on your behalf. In addition, we may ask you to follow the applicable process described above for verifying your identity. You can obtain an "Authorized Agent Designation Form" by contacting us at PrivacyNA@gategroup.com.

4.1.7. Note on Deidentified Information

At times, the Company converts Personal Information into deidentified information using reasonable measures to ensure that the deidentified information cannot be associated with the individual ("Deidentified Information"). The Company maintains Deidentified Information in a deidentified form and does not attempt to reidentify it, except that the Company may attempt to reidentify the information solely for the purpose of determining whether its deidentification processes ensure that the information cannot be associated with the individual. The Company

prohibits vendors, by contract, from attempting to reidentify the Company's Deidentified Information.

4.2. Alberta, British Columbia, and Quebec

This section applies only to job applicants who reside in the Canadian provinces of Alberta, British Columbia, or Quebec.

4.2.1. Your Rights

To the extent provided by applicable law and subject to any relevant exceptions, you may be able to exercise the following rights:

- **Access:** The right to request access to your Personal Information maintained by the Company. The right to access your Personal Information includes the right to receive a copy of all, or a portion, of your Personal Information in the Company's possession as long as the Company providing the Personal Information would not adversely affect the rights and freedoms of others.
- **Rectification:** The right to request that the Company update or correct your Personal Information that is outdated or inaccurate.
- **Withdraw Consent:** The right to withdraw your consent to the processing of your Personal Information, at any time, where you previously consented to the processing of your Personal Information. Any withdrawal shall not affect the lawfulness of processing based on your consent before its withdrawal, and the Company will continue to retain the Personal Information that you provided us before you withdrew your consent for as long as allowed or required by applicable law.

4.2.2. How To Exercise Your Rights

You can contact PrivacyNA@gategroup.com to request to exercise your data rights. The Company will respond to requests to exercise individual data rights in accordance with applicable law. The Company will recognize any additional rights you may have under applicable law, but it will not grant you more rights than applicable law provides.

4.2.3. Additional Information for Quebec Residents

You can contact the data protection officer ("person in charge") at PrivacyNA@gategroup.com.

Because the Company is part of a global multinational corporation, your Personal Information, including all of the categories listed above, may be accessed by Authorized Employees of other members of the gategroup family of companies (collectively, "Group Members"). These Group Members will process your Personal Information for the purposes described above. In addition, the Company and the Group Members will transfer your Personal Information to service

providers, located in third countries, for the purposes described above. Before transferring your Personal Information directly to any service provider located in the U.S. or another third country, the Company or the Company's parent corporation, on the Company's behalf, will ensure that the service provider is subject to a written agreement which limits the processing of your Personal Information to the purposes described in the agreement and subject to the instructions of the Company or of the parent corporation on the Company's behalf.

4.2.4. Additional Information for Alberta Residents

If you have any questions about the collection, use, disclosure, or storage of your Personal Information by service providers outside Canada on the Company's behalf, please contact Legal Counsel (Canada) at PrivacyNA@gategroup.com.

5. Changes to this Notice

The Company may change this Notice from time to time in its sole discretion. If we make a change to this Notice, we will inform you by posting the updated notice on this Site. Those changes will go into effect on the effective date posted in the revised notice. The new policy will apply to all current and past users of the online application page and to all information collected before the date of the change. The new policy will replace any prior policies that are inconsistent. Please check periodically for changes to this Notice, and especially before you provide any Personal Information to us. If we will materially change how we use, disclose or otherwise process your Personal Information, we will notify you before doing so and, where required by applicable law, obtain your consent before using, disclosing or otherwise processing your Personal Information other than as described in this Notice.

In the event of a conflict between this Notice and applicable law, applicable law will govern. The remainder of the Notice will continue to be in effect.

6. For More Information

Please direct any questions or concerns you may have about this Notice to PrivacyNA@gategroup.com.

Annexes

1. Revision History

Version	Date	Author	Change Description
1	January 1, 2020	North America Legal	New Document
2	March 1, 2021	North America Legal	Updated to reflect statutory updates
3	January 1, 2023	North America Legal	Updated to reflect statutory updates
4	August 1, 2026	North America Legal	Updated to reflect statutory updates