

EMPLOYEE AND CONTRACTOR PRIVACY POLICY

This Employee and Contractor Privacy Policy describes the categories of personal information (“PI”) collected or may be collected by Napa LW Hospitality Corporation, along with its subsidiaries and affiliates (collectively, “Company”) and the purposes for which Consumer PI may be used. We are providing this notice to you in accordance with California Civil Code Sec. 1798.100(b).

This notice does not form part of any contract of employment or other contract to provide services.

Categories of Personal Information Collected	Purposes Personal Information is Used.
<p><u>Identifiers and Contact information.</u> This category includes names, addresses, telephone numbers, mobile numbers, email addresses, dates of birth, Social Security numbers, driver’s license or state identification numbers, bank account information, and other similar contact information and identifiers.</p>	<ul style="list-style-type: none"> • Collect and process employment applications, including confirming eligibility for employment, background and related checks, and onboarding • Processing payroll and employee benefit plan and program administration including enrollment and claims handling • Maintaining personnel records and record retention requirements • Communicating with employees and/or employees’ emergency contacts and plan beneficiaries • Complying with applicable state and federal labor, employment, tax, benefits, workers compensation, disability, equal employment opportunity, workplace safety, and related laws • Preventing unauthorized access to or use of the Company’s property, including the Company’s information systems, electronic devices, network, and data • Ensuring employee productivity and adherence to the Company’s policies • Investigating complaints, grievances, and suspected violations of Company policy
<p><u>Protected classification information.</u> This category includes characteristics of protected classifications under California or federal law.</p>	<ul style="list-style-type: none"> • Complying with applicable state and federal Equal Employment Opportunity laws • Design, implement, and promote the Company’s diversity and inclusion programs
<p><u>Internet or other electronic network activity information.</u> This category includes without limitation:</p> <ul style="list-style-type: none"> • all activity on the Company’s information systems, such as internet 	<ul style="list-style-type: none"> • Facilitate the efficient and secure use of the Company’s information systems • Ensure compliance with Company information systems policies and procedures • Complying with applicable state and federal laws

<p>browsing history, search history, intranet activity, email communications, social media postings, stored documents and emails, usernames and passwords</p> <ul style="list-style-type: none"> • all activity on communications systems including phone calls, call logs, voice mails, text messages, chat logs, app use, mobile browsing and search history, mobile email communications, and other information regarding an Employee's use of company-issued devices 	<ul style="list-style-type: none"> • Preventing unauthorized access to, use, or disclosure/removal of the Company's property, records, data, and information • Enhance employee productivity • Investigate complaints, grievances, and suspected violations of Company policy
<p><u>Geolocation data.</u> This category includes GPS location data from company-issued mobile devices and company-owned vehicles.</p>	<ul style="list-style-type: none"> • Improve safety of employees, customers and the public with regard to use of Company property and equipment • Preventing unauthorized access, use, or loss of Company property • Improve efficiency, logistics, and supply chain management
<p><u>Audio, electronic, visual, thermal, olfactory, or similar information.</u> This category includes images and audio, video or call recordings created in connection with our business activities or temperature checks in connection with our safety procedures during the COVID-19 pandemic.</p>	<ul style="list-style-type: none"> • Improve safety of employees, customers and the public
<p><u>Professional and employment-related information.</u> This category includes without limitation:</p> <ul style="list-style-type: none"> • data submitted with employment applications including salary history, employment history, employment recommendations, etc. • background check and criminal history; • work authorization • fitness for duty data and reports • performance and disciplinary records • salary and bonus data • benefit plan enrollment, participation, and claims 	<ul style="list-style-type: none"> • Collect and process employment applications, including confirming eligibility for employment, background and related checks, and onboarding • Employee benefit plan and program design and administration, including leave of absence administration • Maintaining personnel records and complying with record retention requirements • Communicating with employees and/or employees' emergency contacts and plan beneficiaries • Complying with applicable state and federal labor, employment, tax, benefits, workers compensation, disability, equal employment opportunity, workplace safety, and related laws • Business management • Preventing unauthorized access to or use of the

<p>information</p> <ul style="list-style-type: none"> • leave of absence information including religious and family obligations, physical and mental health data concerning employee and his or her family members 	<p>Company’s property, including the Company’s information systems, electronic devices, network, and data</p> <ul style="list-style-type: none"> • Ensuring employee productivity and adherence to the Company’s policies • Recruiting • Investigating complaints, grievances, and suspected violations of Company policy
<p><u>Education information.</u> This category includes education history.</p>	<ul style="list-style-type: none"> • Evaluate an individual’s appropriateness for a participation position at the Company, or promotion to a new position.
<p><u>Inferences drawn from the PI in the categories above.</u></p>	<ul style="list-style-type: none"> • Engaging in human capital analytics, including but not limited to, identifying certain correlations about individuals and success on their jobs, analyzing data to improve retention, and analyzing employee preferences to inform HR Policies, Programs and Procedures

To carry out the purposes outlined above, the Company may share information with third parties, such as background check vendors, third-party human resources and information technology vendors, outside legal counsel, and state or federal governmental agencies. The Company may add to the categories of PI it collects and the purposes it uses PI. In that case, the Company will inform you.

If you have questions about the Company’s privacy policies and procedures, rights you may have concerning your personal information, you may call 1-877-729-2004, or go to <https://lodgeworks.com/hospitality-careers/>.