

Lazy Dog Restaurants, LLC Workforce Member Privacy Policy

Last Updated: August 2023

Our Commitment to Privacy

Lazy Dog Restaurants, LLC, (“Company,” “we,” “us,” or “our”) is committed to privacy for individuals who are or are seeking to become a member of Company’s workforce. To protect individuals’ privacy, the Company has developed and implemented this privacy policy (the “Privacy Policy”). This Privacy Policy is designed to assist you in understanding how we collect, use, share, and safeguard personal information.

To Whom This Privacy Policy Applies

This Privacy Policy applies to personal information collected from individuals in connection with their status as candidates, employees, independent contractors, agents, or other members of the Company’s workforce (collectively “workforce members”). Our privacy practices with respect to personal information collected in other contexts, including visiting the Company Website, can be found in our [Company Privacy Policy](#).

Except as may be specifically required by law, this Privacy Policy does not apply to information available from a public source (such as a telephone directory) or to aggregated or de-identified information we may collect about its workforce, nor to references to workforce members in company work product, such as the names of persons attending a meeting, contributing to a report, or signing a purchase order.

How We Define Personal Information

Personal information (sometimes called “personal data”) is a broadly defined term whose legal definition varies across jurisdictions. When used in this Privacy Policy, “personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an individual.

What Personal Information We Collect

The personal information that we collect and use about you may include:

- **Application information** as part of your candidacy to become a workforce member, the Company may collect application information (e.g., résumé, curricula vitae, application form information, transcripts, recommendations letters, interview recordings and transcripts, and other application materials)
- **Contact Information** (e.g., name, e-mail address, telephone number, postal address)
- **Personal Details** (e.g., title, name preferences, date of birth)
- **Right to Work Information** (e.g., work permit / visa application information)

- **Payroll Information** (e.g., bank account details, tax information)
- **Benefit Information** (e.g., information to provide and maintain retirement, health, and other benefit program services or products)
- **Medical and/or health information** (e.g., medical examination results, vaccination status, reported medical and health conditions)
- **Performance Evaluation Information** (e.g., information about and assessments of your performance collected as part of the employee review process)
- **Performance Records** (e.g., time clock records)
- **Security Information:** (e.g., security badge information, CCTV recordings, premises access logs, video surveillance footage)
- **Safety and Disciplinary Information** (e.g., information in connection with disciplinary action or investigations)
- **Systems Information:** Information about your use of Company systems or information that you provide to us through our information systems (e.g., information from your company e-mail account, information posted on our website, information you submit through applications or software made available to you)
- **Payment information** you provide for goods, services, and other transactions authorized by you in your capacity as workforce member, such as travel expenses.
- Any other information that you provide directly to us or that we receive in connection with your working relationship with the Company.

How We Collect and Disclose Workforce Member Personal Information

The purpose for which personal information will be collected and processed will be consistent with your role as a workforce member at Lazy Dog. Because each workforce member's relationship with the Company varies based on that person's role, location, experience, performance, and other factors, the type, nature, and amount of personal information Lazy Dog may seek to collect from you or process about you will vary.

Collecting Personal Information

We collect personal information about our workforce members from a variety of sources, but primarily from the workforce members themselves. In addition, we gather personal information through workforce members' interaction with company systems and personnel, and we receive personal information from third parties who provide it to us. The following is a list of the sources from which we may collect personal information.

Candidate Recruiting Partners. These are the persons or entities who assist in facilitating recruitment and review of candidates to become workforce members. These entities include recruiting firms, job search services, social media companies (e.g., LinkedIn), and professional recruiting agents. We also may collect personal information from any other person or entity who you provide as a reference, including past employers, personal references, former colleagues, and others.

Human Resources Service Providers. These are the persons or entities who assist in providing human resources and workforce management services, including background check providers, human resources software services providers, insurance providers, employee payment and benefits providers, and similar entities.

Business Services Providers. These are those people or entities with whom we have a relationship to provide business operations services and support to the Company. These providers may include the following:

- **IT Operations Providers.** These include cloud computing service providers, internet service providers, data backup and security providers, functionality and infrastructure providers, and similar service providers.
- **Professional Service Providers.** These include lawyers, accountants, consultants, security professionals, and other similar parties when disclosure is reasonably necessary to comply with our legal and contractual obligations, prevent or respond to fraud or abuse, defend the Company against attacks, or protect the rights, property, and safety of the Company, its customers, and the public.
- **Operations Providers.** These include service providers with whom we partner to provide day-to-day business operations, including real estate advisors, event planners, food services providers, entertainment providers, payment processors, banks, facilities management providers.

Affiliates. Our affiliates include our parent company, subsidiaries, joint venturers, or other companies that we control or that are under common control with us.

Governmental Entities: These are governmental agencies that may provide information about workforce members.

We also may collect personal information from any other person or entity with whom you interact in the scope and course of your affiliation with the Company. For example, we may collect personal information from customers, business contacts, and the general public.

Disclosing Personal Information

We may disclose personal information to any of the entities identified as sources of personal information. We also may disclose any personal information to the following:

- **Legally Required Parties.** Persons to whom we are required by law to provide information, such as pursuant to a subpoena or a court order.

- **Reorganization.** Persons involved in the consideration, negotiation, completion of a business transaction, including the sale, merger, consolidation, acquisition, change in control, transfer of substantial assets, bankruptcy, or reorganization, and any subsequent integration.
- **Authorized Disclosures:** To any party when authorized by the workforce member to whom it pertains.

How We Use Workforce Member Personal Information

We use the personal information we collect as follows:

- **To Process Employment Applications and Onboard New Hires:** We collect most personal information to evaluate your candidacy, including to open and maintain candidate records, communicate with you, conduct employment-related background screening and checks, and evaluate your application.
- **Recruiting and Workforce Member Communications.** We use personal information to communicate with you as part of the candidacy process and as part of your workforce relationship with us. Personal information may be used to evaluate career development, consider candidates for roles and positions, and to communicate company policies.
- **Business operations.** We use personal information to conduct our business operations, including management of staffing resources, financial planning, corporate compliance, internal audits, and other business administration needs.
- **Compensation and Benefits Management.** We collect and process personal data to provide payment and benefits to our workforce members and to ensure we are legally compliant when doing so.
- **Onboarding and Training.** We collect data for integrating new hires into our systems and to provide staff training, feedback, disciplinary procedures, and investigations to meet our business interests in ensuring our staff are best able to carry out their roles.
- **For Diversity and Equal Opportunity Monitoring.** Where permitted by law, you have the option to provide certain sensitive personal information, such as race or ethnic origin, for the purposes of equal employment opportunities monitoring. If you decide not to provide this information, your application will not be prejudiced. You may also tell us if you have a disability, so that we can make appropriate arrangements for you to attend our offices and participate in an interview.
- **To Maintain Security at Our Premises.** If you attend in-person interviews at our offices or facilities, we may collect information related to your access to our building. This may include data related to your use of security control systems, audio and video captured on security cameras, and visitor logging information.
- **To Conduct Evaluations.** We collect and review your personal information from multiple sources to assess your suitability for employment or work with the Company. This may include obtaining pre-employment background checks.

- **Safety and Security Purposes.** We use personal information in connection with the monitoring of our physical and digital ecosystem (which includes using technology to monitor your interaction with our devices and systems). We also use personal information to report on security and safety incidents, notify emergency contacts, and provide reasonable care when applicable.
- **Travel and Entertainment.** We use personal information for travel and entertainment administration.
- **Enforce our Company Policies.** We use personal information to support and maintain compliance with our company policies, procedures, and operations.
- **Required Disclosures.** The Company uses personal information to comply with applicable legal and regulatory requests and obligations (including investigations).
- **Legal Defense.** The Company uses personal information to establish or defend legal claims and allegations.
- **Security Purposes.** The Company uses personal information for security or the prevention, detection, or investigation of fraud, suspected or actual illegal activity, or other misconduct.
- **Professional Advice.** The Company uses personal information to seek advice from lawyers, auditors, and other professional advisers.
- **For Similar Purposes.** If necessary or advisable, we may process your personal information for purposes like those mentioned above, and consistent with the purpose for which you provided your personal information.

Retention of Personal Information

We will retain personal information only for so long as necessary to fulfill the purposes for which we collected the information, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider: (i) the amount, nature, and sensitivity of the personal information; (ii) the potential risk of harm from unauthorized use or disclosure of your personal information; (iii) the purposes for which we process your personal information and whether we can achieve those purposes through other means; and (iv) the applicable legal requirements. Additionally, we may anonymize your personal information (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you. In some circumstances, you may ask us to delete your personal information.

How We Protect Personal Information

We have implemented and maintain reasonable security procedures and practices, appropriate to the nature of the information, to protect your personal information from unauthorized access, destruction, use, modification, or disclosure. However, no security measure is perfect, so we cannot guarantee the security of your personal information. Periodically, our operations and business practices are reviewed for compliance with policies and procedures governing the security, confidentiality, and quality of our

information. Our corporate values, ethical standards, policies, and practices are committed to the protection of personal information. In general, our business practices limit employee access to confidential information and limit the use and disclosure of such information to authorized persons, processes, and transactions.

Children's Personal Information

We do not consider candidates for employment under the legal working age for the jurisdiction in which employment is to be offered. We do not knowingly collect, process, sell, or share the personal information of individuals under the age of 18. If you believe that a child under 18 may have provided his or her personal information, please contact Lazy Dog Restaurants, Attention Compliance 3337 Susan St. Costa Mesa, CA 92626 or email compliance@lazydogrestaurants.com

Your Privacy Choices

Some jurisdictions provide you with specific privacy rights that can be exercised against covered entities. Depending on the jurisdiction, these rights may include:

- **Access.** The right to know (or confirm) what personal information a business has collected about you.
- **Deletion.** The right to request that a business delete personal information it has collected from you, subject to certain exceptions.
- **Correction.** The right to request correction of inaccurate personal information maintained by the business.
- **Opt-Out of the Sale/Sharing of Your Personal Information.** The right to opt out of the sale of your personal information to third parties. The term "sale" varies by jurisdiction, but sometimes includes the right to opt-out of the use of personal information for targeted advertising purposes.
- **Limitation.** The right to limit a business's use or disclosure of certain information, typically sensitive personal information. However, the Company does not use or disclose sensitive personal information for any purpose other than for permissible purposes under applicable law.
- **Opt-out of Profiling:** The right to opt out of profiling in furtherance of decisions that produce legal or similarly significant effects concerning you.
- **Non-Discrimination.** The right not to be discriminated against for exercising any of the rights conferred by law.

The Company will honor the privacy rights afforded to individuals in accordance with applicable law.

You may make a request at any time to exercise your privacy rights listed above by using our [Privacy Portal](#) or e-mailing compliance@lazydogrestaurants.com. We will respond to your request within a reasonable period (if properly submitted) and in accordance with applicable law. If we need more time to process and respond to your request, we will notify you of that fact along with the reason for the delay. If

we decline to act upon your request, we will inform you of our decision and the reason for it, and, if applicable, with instructions on how you may appeal our decision.

International Data Transfers

The Company is based in the United States, and we operate our website and portals from there. The laws that apply to the use and protection of personal information in the United States, or other countries or jurisdictions in which we transfer or process personal information, may be different from the laws and protections in your country. By submitting personal information to us, including by accessing our website and portals, you understand that we may process, store, and transfer your personal information in and to jurisdictions foreign to you, including the United States. Whenever we engage a service provider, we require that its privacy and security standards adhere to this policy and applicable privacy laws.

Updates to Our Privacy Policy

We may update this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the Notice and, in some cases, we may provide you with additional notice (such as adding a statement to our website homepage or sending you a notification).

Contacting Us

To ask questions or comment about this Privacy Policy and our privacy practices, contact Lazy Dog Restaurants and/or email compliance@lazydogrestaurants.com

Supplemental Notice for Residents of California

This section supplements our notice provided above and applies to residents of the State of California. The California Consumer Privacy Act requires that we describe the personal information we collect, disclose, and sell/share based on certain defined categories. To make it easier to read and understand our policy, relevant information is provided in the chart below, which explains the Company’s collection, use, and disclosure practices related to workforce members.

Categories of Personal Information	Categories of Sources from which the Information may have been Collected	Categories of Third Parties to whom this type of Personal Information may be Disclosed for a Business Purpose	Types of Third Parties with Whom this Category of Personal Information Is Shared/Sold
Identifiers (e.g., name, signature, address, telephone email, account name, SSN, DL number, passport number, online identifier, IP address)	<ul style="list-style-type: none"> • Workforce Members directly • Other Workforce Members • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Affiliates • Governmental Entities 	<ul style="list-style-type: none"> • Other Workforce Members • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Affiliates • Governmental Entities 	<p>We do not sell or share personal identifiers in the context of a workforce member relationship.</p> <p>Please see our general privacy policy for the identifiers we sell about consumers generally.</p>
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), (e.g., 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.)	<ul style="list-style-type: none"> • Workforce Members directly • Other Workforce Members • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Affiliates • Governmental Entities 	<ul style="list-style-type: none"> • Other Workforce Members • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Affiliates • Governmental Entities 	<p>We do not sell or share.</p>

Categories of Personal Information	Categories of Sources from which the Information may have been Collected	Categories of Third Parties to whom this type of Personal Information may be Disclosed for a Business Purpose	Types of Third Parties with Whom this Category of Personal Information Is Shared/Sold
<p>Protected Classifications (e.g., 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).</p>	<ul style="list-style-type: none"> • Workforce Members directly • Other Workforce Members • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Affiliates • Governmental Entities 	<ul style="list-style-type: none"> • Human Resources Service Providers • Business Operations Service Providers • Other Workforce Members • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Affiliates • Governmental Entities 	<p>We do not sell or share.</p>
<p>Commercial Information (e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies).</p>	<p>We do not collect commercial information in the context of a workforce member relationship.</p> <p>Please see our general privacy policy for the commercial information we collect about consumers generally.</p>	<ul style="list-style-type: none"> • Other Workforce Members • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Affiliates • Governmental Entities 	<p>We do not sell or share commercial information in the context of a workforce member relationship.</p> <p>Please see our general privacy policy for the commercial information we sell about consumers generally.</p>
<p>Biometric Information (e.g., 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).</p>	<p>We do not collect.</p>	<ul style="list-style-type: none"> • N/A 	<p>We do not sell or share.</p>
<p>Internet/Network Activity (e.g., Internet</p>	<ul style="list-style-type: none"> • Workforce Members directly 	<ul style="list-style-type: none"> • Business Services Providers 	<p>We do not sell or share this information in the</p>

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or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding an interaction with a website, program, software, system or device).	<ul style="list-style-type: none"> • Business Services Providers 		<p>context of a workforce member relationship.</p> <p>Please see our general internet information we sell about consumers generally.</p>
Geolocation Data	We may gather your geolocation based on your address, IP address, or other data associated with a particular location. If you are using company-equipment that collects geolocation, we may associate that geolocation with you.	<ul style="list-style-type: none"> • Business Services Providers 	We do not sell or share.
Sensory Data (e.g., Audio, electronic, visual, thermal, olfactory, or similar information).	We may collect your image, voice, electronic activity, or other sensory data through recording devices such as a security camera, call recording device, or thermal image scanner.	<ul style="list-style-type: none"> • Other Workforce Members • Business Services Providers • Affiliates • Governmental Entities 	We do not sell or share.
Professional or employment-related information (e.g., Current or past job history or performance evaluations).	<ul style="list-style-type: none"> • Workforce Members directly • Other Workforce Members • Candidate Recruiting Partners • Human Resources Service Providers • Affiliates • Governmental Entities 	<ul style="list-style-type: none"> • Other Workforce Members • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Affiliates • Governmental Entities 	We do not sell or share.
Education Information (e.g., 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 schedules, student identification codes, student financial information, or student disciplinary records).	<ul style="list-style-type: none"> • Workforce Members directly • Educational institutions • Candidate Recruiting Partners 	<ul style="list-style-type: none"> • Other Workforce Members • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Affiliates • Governmental Entities 	We do not sell or share.

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<p>Inferences drawn from other personal information (e.g., profile information reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes).</p>	<p>We do not collect inferences, but we may make inferences about workforce members based on the personal information we have collected. For example, we may make inferences regarding a workforce members’ suitability for a particular position or task.</p>	<p>We do not disclose inferences we make outside of the company, but we may store inferred personal data with our Business Service Providers (for example, our cloud storage providers).</p>	<p>We do not sell or share.</p>
<p>Sensitive Personal Information (e.g., Social security, driver’s license, state identification card, or passport number, account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account, precise geolocation; racial or ethnic origin, religious or philosophical beliefs, or union membership; contents of a consumer’s mail, email and text messages (unless we are the intended recipient); genetic data; biometric data for identification purposes; health data; and sex life or sexual orientation data.</p>	<ul style="list-style-type: none"> • Workforce Members directly • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Affiliates • Governmental Entities 	<ul style="list-style-type: none"> • Other Workforce Members • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Affiliates • Governmental Entities 	<p>We do not sell or share.</p>

Exercising Your CCPA Rights

California residents have certain rights under the CCPA. For information on how to exercise these rights, please see below.

Submitting Access, Deletion, and Correction Requests

To make an access, deletion, correction, or limitation request, please use our [online](#) request form/portal e-mail Lazy Dog Restaurants at compliance@lazydogrestaurants.com, or call Lazy Dog Restaurants at 714 596-9960.

After we receive your request, to ensure the security of the information we store and consumers' privacy, we will verify that you are appropriately affiliated with the subject of the request, either as the consumer or as an authorized agent or guardian of the consumer. We may ask you to provide a few pieces of information to confirm your identity in our records.

You may designate an authorized agent to exercise your rights under the CCPA on your behalf. You must provide the authorized agent with written permission to exercise your rights under the CCPA on your behalf, and we may deny a request from an agent on your behalf if we cannot verify that the agent has been authorized by you to act on your behalf. Even if you use an authorized agent to exercise your rights under the CCPA on your behalf, pursuant to the CCPA, we may still require that you verify your own identity directly to us. This provision does not apply if you have provided a power of attorney under the California Probate Code.

Limiting the Use of Your Sensitive Personal Information

Californian's have the right to limit a business's use or disclosure of sensitive personal information. However, the Company does not use or disclose sensitive personal information for any purpose other than for permissible purposes under the CCPA.

Opting Out of the Sale/Share of Your Personal Information

The Company does not sell or share personal information related to the workforce member relationship. Please review the [Company Privacy Policy](#) for more information about opt-out rights for website visitors.

Contact Us Regarding Your Privacy Rights

If you would like additional information related to your privacy, please e-mail Lazy Dog Restaurants and/or compliance@lazydogrestaurants.com]. Please submit your CCPA rights requests using the methods described above.