**SAGE Dining Services, Inc.’s (“SAGE”) Privacy Notice to California Residents**

This **Privacy Notice for California Residents** supplements the information contained in SAGE’s Privacy Policy and applies solely to employees, visitors, and other individuals who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”), the California Privacy Rights Act of 2020 (“CPRA”) and other California privacy laws. Any terms defined in the CCPA and CPRA have the same meaning when used in this notice.

**Information We Collect**

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("**personal information**"). Personal information does not include:

* Publicly available information that is lawfully made available from government records, that a consumer has otherwise made available to the public;
* Deidentified or aggregated consumer information; and
* Information excluded from the CCPA’s or CPRA’s scope.

In particular, we have collected the following categories of personal information from its consumers within the last twelve (12) months:

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| **Category** | **Examples** | **Collected** |
| A. Identifiers. | A real name, IP address, email address, or other similar identifiers. | **YES** |
| 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. | **YES** |
| 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). | **YES** |
| D. Commercial information. | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | **NO** |
| 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. | **NO** |
| F. Internet or other similar network activity. | Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement. | **NO** |
| G. Geolocation data. | Physical location or movements. | **NO** |
| H. Sensory data. | Audio, electronic, visual, thermal, olfactory, or similar information. | **NO** |
| I. Professional or employment-related information. | Current or past job history or performance evaluations. | **YES** |
| J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)). | 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. | **NO** |
| K. Inferences drawn from other personal information. | Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. | **NO** |

We obtain the categories of personal information listed above from the following categories of sources:

* Directly from you. For example, from forms you complete on our mobile app, website or job application portal.
* We retain your data pursuant to our records retention policy.

**Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following business purposes:

* To fulfill or meet the reason you provided the information. For example, if you share your name, contact information, and resume to be considered for a job posting, we will use that personal information in evaluating your qualifications for that position.
* To provide you with support and respond to your requests and inquiries, including to investigate your concerns and monitor and improve our responses.
* To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
* As described to you when collecting your personal information or as otherwise set forth in the CCPA and CPRA.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

**Disclosing Personal Information**

We may disclose your personal information to a contractor or service provider for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories (corresponding with the table above) of personal information for a business purpose: Category A, Category B, Category C, Category I.

We disclose your personal information with the following categories of third parties: our clients, our service providers, and third parties to whom you or your agents authorize us to disclose your personal information in connection with services we provide to you.

In the preceding twelve (12) months, we have not sold or shared any personal information.

**Your Rights and Choices**

The CCPA and CPRA provide California residents with specific rights regarding their personal information. This section describes your CCPA and CPRA rights and explains how to exercise those rights.

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| ***Access to Specific Information and Data Portability Rights*** |

You have the right to request that we disclose certain information to you about our collection and use of your personal and sensitive information, unless responding to the request is impossible or involves disproportionate effort.

Once we receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability, and Deletion Rights*), we will disclose to you:

* The categories of personal information we collected about you.
* The categories of sources for the personal information we collected about you.
* Our business or commercial purpose for collecting or selling that personal information.
* The categories of third parties, contractors and service providers with whom we share, sell or disclose that personal information.
* The specific pieces of personal information we collected about you (also called a data portability request).
* If we disclosed your personal information for a business purpose, a list of those disclosures, identifying the personal information categories that each category of recipient obtained.
* Whether your information is sold or shared.
* The retention period or criteria used for retention.

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| ***Deletion Request Rights*** |

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see *Exercising Access, Data Portability, and Deletion Rights*), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

* Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
* Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
* Debug products to identify and repair errors that impair existing intended functionality.
* Exercise free speech ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
* Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *et. seq*.).
* Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
* Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
* Comply with a legal obligation.
* Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

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| ***Exercising Access, Data Portability, and Deletion Rights*** |

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by sending an email to: [caprivacyrequest@sagedining.com](mailto:caprivacyrequest@sagedining.com). As an alternative, you can call our home office, at 1-410-339-3950.

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

* Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
* Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made using your email address sufficiently verified when the request relates to personal information associated with the email address that you provided at registration.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

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| ***Response Timing and Format*** |

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing.

We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

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| ***Personal Information Sales Opt-Out and Opt-In Rights*** |

SAGE does not sell your personal information.

**Non-Discrimination**

We will not discriminate against you for exercising any of your CCPA or CPRA rights. Unless permitted by the CCPA or CPRA, we will not:

* Deny you services.
* Charge you different prices or rates for services, including through granting discounts or other benefits, or imposing penalties.
* Discriminate in making employment decisions.
* Provide you a different level or quality of services.

**Other California Privacy Rights**

Under California's "Shine the Light" law (Civil Code Section § 1798.83), California residents have the right to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to [caprivacyrequest@sagedining.com](mailto:caprivacyrequest@sagedining.com) and please include the phrase “California Privacy Request” in the subject line, and provide us with your name, address and email address, or write to us at SAGE Dining Services, Inc., Attn: Legal Dept., 1402 York Road, Lutherville, MD 21093

**Changes to Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on the Website and update the notice's effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

Date of Last Update: November 7, 2022

**Contact Information**

If you have any questions about this notice, the ways in which SAGE collects and uses your information described here and in the Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

**Phone**: (410) 339-3950

**Email**: [caprivacyrequest@sagedining.com](mailto:caprivacyrequest@sagedining.com)

**Postal Address**:

SAGE Dining Services, Inc.

Attn: Legal Department

1402 York Road

Lutherville, Maryland 21093