

SUBURBAN PROPANE AND AGWAY ENERGY SERVICES EMPLOYEE AND TALENT ACQUISITION PRIVACY POLICY

Effective Date: January 1, 2023

This Employee and Talent Acquisition Privacy Policy (“**HR Privacy Policy**”) of Suburban Propane Partners, L.P., Agway Energy Services, LLC, and their affiliated entities (referred to in this HR Privacy Policy as the “**Company**”, “**we**”, “**our**” or “**us**”) describes what information we may collect from or about you, how we use it, how we disclose it, how we might share it and how long we keep this Personal Information (as defined below) for during and after your working or job application relationship with the Company.

This HR Privacy Policy applies to all current and former employees, dependents and beneficiaries of a current or former employee, officers, temporary workers, in addition to independent contractors engaged by Company, and current and potential job applicants (referred to solely for the purpose of this HR Privacy Policy as “**personnel**”, “**you**” or “**your**” even though independent contractors and job applicants are not otherwise Company employees under other circumstances).

It is important that you read and understand this HR Privacy Policy. If you have any questions, please refer to the Contact Us section below.

For users in California: Please see below a list of the categories of Personal Information collected at [Section III](#) below and review additional information about your consumer rights under the California Privacy Laws in [Section XI](#) below.

I. Changes to the HR Privacy Policy

We reserve the right to update or modify this HR Privacy Policy at any-time without prior notice and in such case will post the updated version and its effective date. If we make a change to this Privacy Policy that, in our sole discretion, is material, we will notify you as appropriate under the circumstances. Unless otherwise indicated, any changes to this Policy will apply immediately upon posting. Please review the HR Privacy Policy periodically for updates. You can see when this HR Privacy Notice was last updated by checking the “Effective Date” displayed at the top of this notice.

II. Definition

The term “**Personal Information**” means any information that identifies, relates to, describes, or is capable of being associated with, a particular individual as defined under applicable data privacy laws. Personal Information expressly excludes anonymized data that is de-identified and/or aggregated in accordance with applicable data privacy laws or regulations.

The term “**Sensitive Personal Information**” means Personal Information of children, or Personal Information that reveals information about a living individual’s physical or mental health, racial or ethnic origin, political or religious views, trade union membership, sexual orientation, genetic information, biometric information, commission or alleged commission of crime or related proceedings, and, in some jurisdiction, financial information.

III. Personal Information We Collect About You

1. **Data Categories.** The Company collects Personal Information that we require in order to manage and support our relationship with you. We may collect the following categories of Personal Information:

A. **Identifiers**, including

- **Identification Data**, including your name, photograph, date of birth, employee identification number, driver's license, veteran status and language preference.
- **Contact Data**, including your email and mailing addresses, phone number and professional title.
- **National identifiers**, including your national ID/passport, immigration status and documentation, visas, social security numbers (for US only).
- **Personal information of persons related to you**, including your emergency contacts, spouse, beneficiary & dependents information. You are responsible for obtaining any necessary consent or permission to provide Company their Personal Information.,

B. **Personal Information as defined in Cal. Civ. Code § 1798.80(e)**, including

- **Employment details**, including your job title/position, office location, hire dates, employment contracts, performance and disciplinary records, grievance procedures, sickness/holiday records, and geolocation data.
- **Educational and professional background**, including your academic/professional qualifications, education, CV/résumé, reference letters and interview notes, prior military service, criminal records data (for vetting purposes, where permissible and in accordance with applicable law).
- **Financial information**, such as banking details, tax information, payroll information, withholdings, salary, mandatory and voluntary benefits, expenses, company allowances, stock and equity grants.

C. **Protected Classification**, including

- **Demographic data**, including race, ethnicity, sexual orientation, and disability and other Personal Information classified as "Sensitive Personal Information" to help us understand the diversity of our workforce. This information, when collected, is generally done so on a voluntary consensual basis, and employee and employee applicants are not required to provide these categories of Sensitive Personal Information, unless it is necessary for us to collect such information to comply with our legal obligations.

D. **Commercial Information:** Not Applicable

E. **Biometric Information:** Not Applicable

F. **Internet or other similar activities**, including

- **IT Usage Data**, including your username, password and other identifiers that you may set to access our network or any password protected sites, applications, and other services we offer to our employees, IP addresses, log files, login information, and software and hardware inventories (for further information about how we process IT information, see "Employee Monitoring" section below).

G. **Geolocation Data:** Physical location or movements, as relating to performance of your job duties in some cases or prospective employment.

H. **Sensory Data:** Audio, electronic, visual information directly from you and your devices through audio recordings of customer service calls; audio/video recordings of in-person and virtual meetings, presentations, and events.

I. **Professional or employment related information:** Yes. See *Employment details and Educational and professional background*, as described in Category B above.

J **Non-public education information:** Yes. See *Employment details and Educational and professional background*, as described in Category B above.

K **Inferences drawn from other PI:**

- **Inference Data**, including information you voluntarily provide to us that reflects your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes. For the avoidance of doubt, we do not subject employees to automated decision-making.

L. **Sensitive Personal Information**, including:

- **Health information**, such as benefit-related information and other information about short- or long-term disabilities or illnesses that you may share with a Company Employee or that we may otherwise receive on your behalf, particularly in relation to any leave of absence you may need to take, or any data relating to drug testing, or DOT physicals.
- **National Identifier** as described in Category A above.
- **Demographic data** as described in Category C above.
- Certain **Financial information** as described in Category B above.
- Contents of email, text messages in connection with Employee Monitoring as provided in Section VI.

** We only collect Sensitive Personal Information for legitimate business purposes appropriate for the use and disclosure of Sensitive Personal Information as defined in the California Privacy Laws, and not otherwise use it to infer characteristics about you.

In addition, we may collect the following categories of Personal Information from job applicants:

- Referral names and contact information who have referred job applicants to apply for openings with us;
- Information relating to character and employment references;
- Information related to your browsing and email interactions with our applicant tracking system (ATS), job sites, or other platforms relating to talent acquisition that facilitate your job application, interviews and/or other related activities as you explore employment opportunities with Company, which may include internet protocol (“IP”) addresses, device or browser type, referring/exit pages, the files viewed on our site (e.g., HTML pages, graphics), operating system, date/time stamp, and/or clickstream data; and
- Any other information you elect to provide to us (e.g., employment preferences, willingness to relocate, current salary, desired salary, awards, or professional memberships).

2. **Sources:** We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly and indirectly from you or your agents
- Directly and indirectly from activity on our websites and intranet sites (including ATS and other HR-related platforms)

- Directly and indirectly from GPS, security cameras, or other recording devices
- From other sources relating to your employment or job application(s) with us, which may include staffing firms, external recruiters, credit reporting agencies, your sources of employment reference, and/or our service providers or contractors collecting your Personal Information on our behalf. For example, we may collect Personal Information from credit reporting agencies when we perform background screening checks that are necessary for role(s) to be performed by you as our employee, or job opening(s) that you have applied for in your capacity as a job applicant. In most circumstances and where required by applicable laws, we will get your permission before we collect Personal Information about you from a third party.

If we ask you to provide any other categories of Personal Information not described above, then we will notify, or communicate our request to, you at the point we collect the Personal Information that we ask you to provide, and the reasons why we ask you to provide it.

3. Disclosure of Personal Information. In the preceding 12 months, we may have disclosed Categories A-C, F-L in the Table above for business purposes, with our affiliates, service providers, other parties with your permission or in accordance with our legitimate HR operations, among others. For more details, please refer to [Section V \(Disclosure or Transfer of your Personal Information to other Parties\)](#).

4. Data Retention. We keep your Personal Information only as long as necessary to fulfill the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.

5. Purposes for which we collect, use or disclose Personal Information. We use the categories of California Personal Information listed above to provide our Services to you, to operate, manage, and maintain our HR operations as disclosed in [Section IV \(Use of Personal Information\)](#) of this HR Privacy Policy.

IV. Use of Personal Information

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

- To manage all aspects of your employment relationship, including, but not limited to the establishment, maintenance, administration and termination of employment relationships, determining eligibility for hiring, verification of references, qualifications, and/or criminal records (for certain vetting purposes, where permissible and in accordance with applicable law), reviewing work performance and determining performance requirements; enforcing disciplinary actions or termination.
- To conduct employee orientation, engagement, training, and other career development or HR-related programs.
- To provide payroll and benefits to you and your eligible dependents, processing employee work-related claims (e.g., worker compensation, insurance claims, reimbursement requests, or leave of absence requests).
- To protect the safety and security of our workforce, guests, property, and assets (including controlling and facilitating access to and monitoring activity on and in our premises and activity using our computers, devices, networks, communications and other assets and resources).

- To utilize location information, including through GPS tracking technology on Suburban-owned devices, or other devices which you use in connection with your employment.
- To investigate and respond to claims (e.g., worker compensation, insurance claims, etc.) and leave of absence requests.
- To maintain emergency contact and beneficiary details.
- To provide you IT services relating to your role as a current employee of Company, including implementing and administering IT systems and information security, authentication and authorization to access our IT systems or network;
- To book authorized travels for you or coordinate your attendance of job-related, professional, or employer-sponsored events;
- To comply with applicable Company policies and laws (including health and safety, employment laws, tax, and anti-discrimination laws and regulations), including judicial or administrative orders regarding individual employees (including garnishments, child support payments).
- To compile internal directories, such as employee directories (excluding job applicant's Personal Information);
- To prevent and detect fraud or other types of wrongdoing;
- To fulfill other legitimate purposes reasonably required for day-to-day operations, such as accounting, financial reporting and business planning.
- To carry out any additional purposes (if applicable law requires your express consent for such additional use or disclosure we will obtain it from you).
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by us is among the assets transferred;

V. Disclosure or Transferal of your Personal Information to other Parties

We may disclose or transfer your Personal Information to other parties as follows. When we share Personal Information with other parties we use commercially reasonable efforts to require that they use or disclose such Personal Information only as necessary to provide the requested services to us and in a manner consistent with the use and disclosure provisions of this HR Privacy Policy and applicable laws.

- With our affiliates, subsidiaries, consultants, service providers, contractors and other parties outside of our organization:
 - in connection with providing benefits and services we offer our employees (such as wellness program service providers, paycheck processing and insurance providers), or carrying out services relating to the job applicant and/or recruitment process on our behalf. These companies are authorized to use your Personal Information only as necessary to provide these services to us.
 - To carry out the uses of Personal Information described above (see Use of Personal Information Section). As necessary to protect the rights, privacy, safety, or property of an identifiable person, as necessary to exercise, establish or defend our legal rights, respond to an emergency if a natural person is at risk or danger of death or physical injury (subject to restrictions required under applicable laws), or to detect, prevent or otherwise address

fraud, security or technical issues, or to protect against harm to the rights, property or safety of Company, our consumers, applicants, candidates, employees or the public or as otherwise required by law.

- With our insurers, and other professional advisers (such as bankers, lawyers, accountants) that need access to your information to provide operational or other support on our behalf.
- With any law enforcement or other government agency, as required by applicable law or regulation, to enforce the terms of our agreements, website terms of use, or protect the rights, property or safety of our employees or Company. Under such circumstances, we may be prohibited from providing you with notice of such disclosure, and we reserve the right not to provide you with such notice.

If we sell, transfer or otherwise share some or all of our assets in connection with a merger, reorganization, liquidation, dissolution, bankruptcy, or sale of assets, we may transfer your Personal Information as a part of the assets transferred as a result of the transaction without your consent.

We may ask, from time to time, if you would like us to share your information with other unaffiliated third parties, who are not described elsewhere in this HR Privacy Policy. We will only disclose your information in this context with your consent.

VI. Employee Monitoring

With respect to our employees (other than job applicants), Company physically and electronically monitors its offices, and use of our IT and communications systems, for specific, lawful purposes. Where permitted by applicable law, we may monitor or record activities that involve employee's Personal Information. For example, we may monitor employees' activity and presence in our offices with badge readers, sign-in sheets, and surveillance cameras. We generally do these things to prevent unauthorized access to our offices and to protect employees, authorized visitors, and our property. Company may also monitor or record activity on our IT and communications systems and network, such as internet traffic, website filtering, email communications or systems accessed.

Where permitted by law, we may also carry out monitoring for other purposes such as:

- Validation of business transactions and archiving;
- Training and evaluation of employees;
- Protection of confidential information, intellectual property and other business interests;
- Investigation of breaches of Company's policies and procedures, or other unlawful or improper acts;
- Compliance with a legal obligation; or
- Other legitimate purposes as permitted by applicable law.

In the process of monitoring Company's offices, systems, network and work-related activities, we may come across employees' or employee applicants' Personal Information. Monitoring will be done in a manner that is proportionate and only as required or permitted by applicable laws. Company will always strive to respect employees' reasonable privacy expectations.

Lastly, we want you to be aware that all Company's employee work product as well as tools used to generate that work product, wherever stored, belongs to Company and we may review and monitor them for the purposes described above.

VII. Safeguarding your Personal Information

The Company recognizes the importance of safeguarding your Personal Information and we endeavor to maintain reasonable security measures to protect against unauthorized disclosure or access. When we engage third-parties to perform services on our behalf, we require them to observe the intent of this HR Privacy Policy. No method of data transmission or storage is 100% secure, so we cannot guarantee the security of your Personal Information. However, the safety and security of your Personal Information also depends upon you. Where you use a password for access to required parts of Company networks, systems, HR-related platforms or related services, you are responsible for keeping your password confidential and activate other security measures made available. Do not share your password with anyone.

a. Links to Other Sites

The Company websites may provide links to websites or social media pages operated by other third-parties. If you click through to another website or webpage, your activity will be subject to the privacy policy of that website or webpage, and not to this HR Privacy Policies. We recommend that you review the privacy policies of other websites or webpages before you use them.

b. Retention of Your Personal Information

We keep your Personal Information only as long as necessary to fulfill the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements. Generally, this means we will keep your Personal Information until the end of your employment or HR-related interactions with us, plus a reasonable period of time after that, where necessary to respond to any employment inquiries, deal with legal, tax, accounting or administrative matters, or to provide eligible employees (other than job applicants) with ongoing pensions or other benefits. In some circumstances, we may de-identify, aggregate, or otherwise anonymize your Personal Information consistent with applicable laws and industry standards so that it can no longer be associated with you, in which case it is then treated as non-Personal Information.

c. Use of Company websites by a child under age 13

Our HR-related platform, websites, or applications are not directed to or intended to be used by anyone under the age of 13. We do not knowingly collect information from children under the age of 13. If you are under 13, please do not attempt to fill out our HR-related forms or send any Personal Information to us. If a child provides us with any Personal Information, the parent or guardian should notify us by sending an email to pr@suburbanpropane.com or pr@agwayenergy.com. Upon receipt of the email, we will delete the child's information, and will remove it from any promotional contact list and database. If we learn that we have collected Personal Information from a child under age 13, we will delete that Personal Information promptly.

VIII. Information About Your Website Activity

We may collect information about you through cookies and other similar technologies as described in the Section VII of the Suburban Privacy Policy, which supplements this HR Privacy Policy.

IX. Additional Notice to Job Applicants

If you do not wish to receive our email marketing communication for promotional or job opening purposes, you may opt-out by clicking on the “unsubscribe” or “opt-out” link in the e-mails we send you.

Various browsers (i.e., Internet Explorer, Chrome, Firefox, Edge, etc.) allow a “do not track” (DNT) setting, which sends a signal to websites visited by an individual about their browser DNT setting. At this time, there is no general agreement on how companies, like us, should interpret DNT signals. Therefore,

at this time our HR-related websites, platform, or applications do not respond to “Do Not Track” signals transmitted by browsers.

X. Contact Us

If you have any questions regarding this HR Privacy Policy, the ways in which we may collect and use your Personal Information, how to update or correct any outdated or inaccurate information, your choices and rights regarding such use, or wish to exercise your rights with respect to your personal information, please contact us at:

- E-mail: privacy@suburbanpropane.com
- Phone: (877) 976-6866

XI. CONSUMER RIGHTS FOR CALIFORNIA RESIDENTS ONLY –

If you are a California resident, please see Subsection (b) of our [Privacy Notice for California Residents](#) for additional disclosures and information about the rights you may have regarding your Personal Information.