

## Southwest Foodservice Excellence (SFE) Privacy Policy

SFE is concerned about privacy issues and wants you to be familiar with how we collect, use and disclose information. This Privacy Policy describes our practices in connection with information that we collect through activities including websites, direct mail, social media and through your interactive business with SFE. By interacting with us, you consent to our use of information that is collected or submitted as we describe in this privacy policy. When we refer to “we” or “SFE” in this policy, we are referring to SFE LLC, Inc. and its affiliates. This policy applies only to residents of the United States.

We encourage you to review the following elements of SFE’s privacy policy, each linked to a full corresponding description within this document:

- Information We Collect
- How We May Collect the Information
- How We May Use the Information
- How Your Information Is Shared
- Cookies
- Surveys
- Contests, Promotions and Giveaways
- Careers
- How Your Information is Protected
- Social Media Features
- Links to Third-Party Websites and Services
- Retention of Personal Data
- California Residents
- Questions or Concerns
- Modification of this Privacy Policy

In summary, we collect information in a wide variety of ways—from your interaction on this Website, to communicating directly with you to carefully measuring our website traffic—to better understand and serve you, our customers and prospective customers.

## **Information We Collect**

We may collect two basic types of information from you in conjunction with your use of the Website – personal information and non-personal information.

“**Personal information**” is any information that can individually identify you and includes, for example and without limitation, your name, email address, username, telephone number, postal address, and so forth. “**Non-personal information**” includes information that does not personally identify you, but may include (without limitation) tracking and usage information about your location, demographics, transaction information, use of the Website and the Internet, etc.

### **Personal Information**

- Your personal and/or business contact information, including your name, title, postal address(es), phone number(s) and email address(es)
- complaints or grievances;
- purchasing habits and customers;
- customer preferences;

In addition, with respect to employees, former employees and applicants, additional categories of collected data may include:

- Personal details
- Employment details
- Financial details
- Complaints or grievances
- Email and postal addresses
- Telephone and facsimile numbers
- Limited sensitive data if disclosed or volunteered by the employee, former employee or applicant, such as racial or ethnic origin, physical or mental health or condition, religious observance, and information that may be

collected in the ordinary course of the employment relationship, such as, issues notified under whistleblower policies, criminal records and disciplinary records.

### **Non-Personal Information**

When you use the Website, our servers may keep an activity log that does not identify you individually. These logs may include information such as device information about your computer, mobile device, or other device that you use to access the Website, which may include your IP address, browser, etc., and additional traffic data, such as time and date of access, access times, and referring website addresses. We use this information to assist us in running the Website and ensuring proper operation.

### **Children's Online Privacy**

SFE respects the privacy of children and we are committed to complying with the Children's Online Privacy Protection Act (COPPA). We do not intentionally collect personal information from children. If we learn that a child under 13 has provided personal information to us without verification of parental consent, we will take commercially reasonable steps to delete that information.

### **How We May Collect the Information**

We may collect information in a variety of ways, including:

- From you directly.
- Through this site: SFE may collect information through the website when you visit.
- Through business interaction: We may collect information through your or your employer's business interaction with our employees or offices.

- From other sources: We may receive information from other sources, such as (but not limited by) public databases; joint marketing partners; social media platforms; or other third parties.

## **How We May Use the Information**

Examples of how we may use the information we collect include (but are not limited to):

### **Orders and services fulfillment**

- Process orders or requests for information about our services on our website, or to otherwise serve you
- Connect within SFE regarding our services via personal contact, e-mail, or on social media platforms
- Administer surveys, sweepstakes and contests

### **Internal Operations**

- Improve the effectiveness of our website and outreach efforts
- Conduct research and analysis
- Maintenance and upkeep of customer accounts and records
- Marketing activities
- Determine your qualifications for a position with SFE, when you apply for a position with us
- Perform other activities as needed, or as described elsewhere in this privacy policy

### **Fraud Prevention**

- Prevent fraudulent activity
- Monitor against theft
- Protect our employees and customers, and our operations and assets

### **Legal Compliance**

- Investigate claims, incidents or inquiries

- When applicable for regulatory filings
- Assist law enforcement, health officials and other government entities to respond to legal, regulatory, health and similar inquiries

## **How Your Information Is Shared**

### **SFE, As Well As Its Associates, Organizations and Service Providers**

We may share the information we collect with organizations that provide internal operations and administrative support services to us (such as printers, analytics providers, web hosting providers, sweepstakes vendors and payment processors, as well as social media and agency teams to SFE.) These organizations may need information about you in order to perform their functions. If we share your personal information with them, it is on a confidential basis and the Service Providers are not authorized to use the personal information we share with them for any purpose other providing services for SFE.

### **Legal Requirements**

We may disclose information we collect when we believe disclosure is appropriate to comply with the law; to enforce or apply applicable terms and conditions and other agreements; or to protect the rights, property or safety of our organization, our employees, our customers, the public or others. We also share your information when applicable for regulatory purposes.

### **Elsewhere at Your Direction**

At your direction or request, we may share your information.

### **Sharing Aggregate Information with Third Parties**

We may share aggregate non-personally identifiable information (information that does not directly identify an individual) with third parties for any lawful purpose.

### **Asset Transfers**

We may also share your information if we sell or buy any business or assets, in which case we may share your personal data to the prospective seller or buyer of the business or assets. If SFE or substantially all its assets are acquired by a third party, personal data held may be one of the transferred assets. Any third party who acquires assets from us may acquire all or part of our business. They may not be in the same line of business as we are. Similarly, your personal information may be passed on to a successor in interest in the event of a reconstruction, liquidation or administration.

SFE may also share your personal data with a potential or actual buyer (and its agents and advisers) in connection with any proposed or actual purchase, merger or acquisition of any part of our business.

SFE will not use or share or sell any of your personal information to any third party for its use in marketing or solicitation without your consent other than what we have outlined in this policy.

### **Cookies**

SFE, its service providers or other third parties may set cookies for your web browser when you visit our website, use our products or visit a website where SFE provides ads, content or analytics.

### **Use of cookies by SFE**

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. Cookies

may be used to store items such as identifiers and user preferences. A website may set a cookie to the browser used if the browser's preferences allow it.

Generally, we use cookies in order to improve the user experience of this website in particular with customized content, tell us which parts of the websites the users have visited, keep track of your preferences while you are using SFE services, provide enhanced services, remember the location and language settings for individual users, provide general internal and customer analytics, and support security measures.

Most browsers are initially set to accept cookies, but you can change your settings to notify you when a cookie is being set or updated, or to block cookies altogether. Please consult the "Help" section of your browser for more information. Please note that by blocking any or all cookies, you may not have access to certain features, content, or personalization available through the Website.

### **Third Party Cookies**

Certain organizations provide services that analyze information regarding visits to sfellc.org They use technology such as cookies and web beacons to collect this information. The "Help" function of your browser should contain instructions to set your computer to accept all cookies, to notify you when a cookie is issued, or to not receive cookies at any time. If you set your computer to not receive cookies at any time, certain personalized services may not be provided to you.

- This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage.

Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser; however, please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

- For more information on Google's privacy and cookie policy, please visit Google's privacy policy at <http://www.google.com/privacy/privacy-policy.html>. To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

### **“Do Not Track” Practices**

At this time, the Website is not configured to support do-not-track signals from browsers or other consumer choice mechanisms regarding the collection of behavioral tracking data. While we collect personal information from you as described above, we do not collect personal information from you to monitor your online activities across third party websites or online services and over time (also known as behavioral advertising or interest-based advertising). We do not use or allow third parties to collect personal information from you on the Website to monitor your online activities across third party websites or online services and over time.

### **Surveys**

The information you provide for surveys will be used to support your relationship with SFE. SFE may use online surveys to ask visitors/customers for contact information (like their email address). We use contact data from our surveys to send the survey taker information about our company and promotional material



on behalf of our partners. We may combine survey information with other data we hold about you.

### **Contests, Promotions and Giveaways**

The information you provide during contests, promotions and giveaways will be used to support your customer relationship with SFE. SFE may ask for contact information (like your email address). We use contact data from these events to send users information about our company and promotional material from some of our partners. The contact information is also used to contact the visitor when necessary. We may combine this information with other data we hold about you.

### **Careers**

If you use the website to apply to work with us, the information you provide will be used to evaluate your candidacy for job opportunities with SFE and to monitor recruitment statistics. We provide electronic applications on our site in which we ask job candidates for contact information (like their email address) and information regarding work history and education. We use third parties to help us to do that. We use contact data from our applications to contact those individuals whose backgrounds most closely meet our requirements to schedule a personal interview. Personal information about unsuccessful candidates will be held after the recruitment exercise has been completed and may be reconsidered should an appropriate position become available. SFE will follow the applicable law as to destruction and deletion of such personal information. We may retain de-personalized (also called anonymized) statistical information about applicants to help inform our recruitment activities, but individuals should not be identifiable from that data. Once a person has taken up employment with us, we will compile a file relating to their employment. At that stage, we will give more details about how we hold employee data.

### **How Your Personal Information is Protected**

#### **Security Methods**

SFE uses administrative, technical and physical measures to protect information under our control. While SFE uses reasonable efforts to protect your personal data, no website, database or computer system is completely secure or “hacker proof”, and criminals have been adept at circumventing widely adopted security safeguards.

Accordingly, you acknowledge that the use of the internet is not entirely secure and that you provide personal information to SFE at your own risk. SFE does not guarantee the security or integrity of any personal data that are transferred from you or via the internet. You are also responsible for taking reasonable steps to protect your personal information against unauthorized disclosure or misuse.

SFE is not responsible for any third party’s actions or its security controls with respect to information that third parties may collect or process via the website, services or otherwise.

#### E-Mail Security

“Phishing” is a scam designed to steal your personal information. If you receive an e-mail that looks like it came from us asking you for personal information, do not respond. We will never request your password, username, payment card information or other personal information through e-mail.

#### **Social Media Features**

This website includes social media features, including LinkedIn, YouTube and Facebook buttons. These features may collect your IP address, which page you are visiting on this website, and may set a cookie to enable the feature to function properly. Social media features are either hosted by a third party or hosted directly on this website. Your interactions with these features are governed by the privacy policy of the company providing it.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site or our online ordering facility, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Please make sure this password is unique and that you do not use this password for any other purpose. If you use another account (such as

a social media account) to log on to a secure part of the SFE website, then please make sure that you keep that password secure as well. If you think that any of your passwords have been compromised, please notify us so that we can look after the security of your details on our website.

### **Links to Third-Party Websites and Services**

This website may contain links to third-party sites. If you click on those links this will take you outside SFE's service. We cannot control and are not responsible for the privacy practices of those third-party sites. We encourage users to be aware when they leave this website, and to read the privacy statements of each website they visit. This Privacy Policy applies only to this Website.

### **Retention of Personal Data**

We retain personal data we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal data, we will either delete or anonymise it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal data and isolate it from any further processing until deletion is possible.

### **California Residents**

If you are a California resident and have an established relationship with us, you can request a notice disclosing the categories of personal information we have shared with third parties, for the third parties' direct outreach purposes, during the preceding calendar year. Contact us at 480-551-6550 to request.

## Questions or Concerns

Email and Other Communications: We may contact you by email or other means at an email address that you have provided to us. If you do not want to receive email from us, please let us know through the “unsubscribe” feature included in our communications.

If you have specific questions about how we collect or use your information, please bring contact us through the SFE contact page, located here: <https://sfellc.com/contact/>

## **Modification of this Privacy Policy**

If we intend to use or disclose your personal information in any way materially different than what we say in this privacy policy or make any other material changes, we will make reasonable efforts to revise this policy. If we make any changes to this policy, we will change the “Revised” date below to reflect the date the changes take effect. A current version is always available on the website. Please inform yourself regularly.

*Revised: October 15, 2019*