

## Privacy Policy: California Employees, Contractors, and Job Applicants

**Last Updated:** July 1, 2023

This Privacy Policy (this “**Policy**”) describes how Kendra Scott, LLC and its existing and future affiliates, parent companies and subsidiaries (“**Kendra Scott**,” “**we**,” “**our**” or “**us**”) collect, use, or share Personal Information we collect from or about our California employees, contractors, and applicants for positions with our company. When you apply for a job or accept employment or a contract with Kendra Scott, you agree that we will collect, use, and disclose your Personal Information in accordance with this Policy.

**This Policy does not apply to information we may collect on our websites, at our retail locations, when you make a purchase from an independent community stylist, or otherwise when you contact us or provide information as a customer. Our privacy policy applicable to our customers is available at <https://www.kendrascott.com/privacy.html>.**

In this Policy, we refer to “Personal Information,” which is information that identifies or is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a Kendra Scott employee, job applicant, or contractor who is a California resident.

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### **1. Notice at Collection of Personal Information**

**A. Personal Information Collection:** We collect the following categories of Personal Information:

- **Identifiers/contact information:** Your name, contact details (such as your address, email address, or phone number), and unique identifiers associated with you (such as government-issued identification numbers, employee ID number, or IP address).
- **Characteristics of protected classifications under California or federal law:** Demographic information (race, ethnicity, national origin), age and date of birth, gender, gender identity, sexual orientation, marital status, military or veteran status, immigration status, union membership, health or medical condition, or disability.
- **Professional or employment-related information:** We collect information about prospective and current employees and contractors, such as:

- Your resume, cover letter, and information you choose to share about your qualifications, experience, and area of interest.
  - References, consumer reports, and background checks.
  - Performance reviews, attendance records, training records, and disciplinary reports.
  - Employee details, such as employee type, photo, work location, division, department, position level, contract type, hire date, end date, non-disclosure agreements, or reason for termination.
  - Work authorization and visa information.
  - Emergency contact details, such as the person and contact information to be contacted in case of an emergency.
  - Information we collect for human resources, procurement, or business operations purposes, such as such as salary, tax information and forms, expense reimbursements, working time data, leave records, banking and direct deposit information, benefits elections, beneficiaries, spousal, partner, or dependent information, or other information.
- **Internet or other electronic network activity information:** This includes your use of technology on Kendra Scott’s networks and systems, including your user log-in information and passwords, network activity, swipe card access, time recording software, and telephone usage data.
  - **Audio and Visual Information:** In some locations, your image, audio, or information about your movement is captured via CCTV.
  - **Education information:** Information you share about your educational qualifications and anticipated graduation date (where applicable).
  - **Personal information described in Cal. Civ. Code 1798.80(e):** Information that identifies a particular individual, including medical information, health insurance information, payment or financial account information.
  - **Inferences:** The inferences that we draw from the above categories of Personal Information.
  - **Sensitive Personal Information:** Certain information that we collect may be considered “sensitive personal information.” For example, this includes your government-issued identification numbers (such as your driver’s license number, passport number, or Social Security number), credentials allowing access to an account, racial or ethnic origin, union membership, information concerning health or health conditions, and information concerning sex life or sexual orientation.

**B. Sales and Sharing of Personal Information:** We do not “sell” or “share” your Personal Information as these terms are defined in applicable law.

**C. Our Purposes for Using Personal Information**

Your Personal Information is used to support Kendra Scott’s Human Resources and business operations, including, without limitation for the following business purposes:

- Personnel management, such as monitoring and evaluating performance, training, day-to-day management, and responding to your requests, inquiries and comments;
- Operational / HR purposes, such as distributing payroll and benefits, updating and managing personnel files, conducting audits and providing IT support and other troubleshooting;
- Security purposes, such as to protect our employees, contractors, customers, and property;
- We use the Personal Information we collect for purposes of determining your qualifications for employment or a contract and to potentially correspond with you.
- Legal and compliance purposes, such as implementing internal policies, responding to suspected fraud or other illegal activity, protecting the rights and property of Kendra Scott and others, and complying with laws, legal processes, and governmental requests.
- Other purposes required by law, regulation or as deemed necessary by Kendra Scott for the proper management of its employees and its business.

#### **D. Our Retention Policy**

Your Personal Information will only be retained for as long as is reasonably necessary. What this means in practice will vary. We take into account any ongoing need for the Personal Information, as well as our legal obligations for example in relation to tax, health and safety, employment rights and potential or actual disputes or investigations.

## **2. How Your Personal Information Is Collected**

We or our service providers generally collect your Personal Information directly from you. We may also collect your Personal Information from your previous employer or references, or from third parties, such as employment agencies or background check agencies. We combine the information we receive from and about you.

Whenever you visit or interact with the careers website, we or our service providers may use a variety of technologies that automatically or passively collect information about your activity and the device used to access the portal. We describe these practices in our customer-facing Privacy Policy available at <https://www.kendrascott.com/privacy.html>.

## **3. How Your Personal Information is Disclosed**

We may disclose each category of Personal Information identified above under “Personal Information Collection” for business purposes identified above under “How Your Personal Information is Used” including, without limitation, to the following categories of entities:

- **Service Providers:** Kendra Scott may contract with third party service providers as part of its normal business operations to carry out certain human resources-related tasks and data hosting

services (such as for example employee benefits providers, IT service providers or HR database services).

- **Professional Advisors:** We may share your Personal Information with our professional advisers, such as our accounting and legal advisers, where they require that information in order to provide advice to Kendra Scott.
- **Legal Matters; Safety:** We may share information with local authorities and other parties in accordance with local regulations, to prevent crime, or as part of internal investigations within Kendra Scott. Personal Information also may be shared to respond to internal or external audit and inquiries, compliance investigations, law enforcement requests, requests from administrative or judicial authorities or where required by applicable laws, court orders, or government regulations. Such parties with which Personal Information may be shared for such purposes may include: (a) tax authorities, social security services, judicial authorities, employment/labor or other authorities; and (b) independent public accountants, authorized representatives of internal control, regulatory or compliance functions such as auditors, legal and/or corporate security firms.
- **Business Transfers:** We may also disclose or otherwise process Personal Information in the context of any sale or transaction involving all or a portion of the business, or as may be required or permitted by law.
- **Other.** We may disclose Personal Information with your consent and at your direction; for other purposes as disclosed at the time you provide your information; and for any other lawful purpose.

In each case, Kendra Scott will undertake reasonable and lawful action to ensure that any use or disclosure of your Personal Information complies with applicable law and is limited to the extent reasonably necessary under the circumstances, as determined by Kendra Scott in its sole discretion.

#### 4. Your California Privacy Rights

If you are a California resident, you may take advantage of the following privacy rights:

- **Right to Know:** You have the right to know what Personal Information we have collected about you, including the categories of Personal Information, the categories of sources from which the Personal Information is collected, the business or commercial purpose for collecting, using, or sharing Personal Information, the categories of third parties to whom we disclose Personal Information, and the specific pieces of Personal Information we have collected about you.
- **Right to Delete:** You may request that we delete the Personal Information that we have collected from or about you. Note that there are some reasons when we will not be able to fully address your request, such as to perform a contract, to detect and protect against fraudulent and illegal activity, to maintain for internal purposes, to comply with a legal obligation or to preserve or exercise our rights.
- **Right to Correct:** You have the right to correct inaccurate Personal Information that we may maintain about you, subject to appropriate verification.

**Right to Non-Discrimination.** You have a right not to receive discriminatory treatment from Kendra Scott for exercising your privacy rights conferred by law.

**Use and Disclosure of Sensitive Personal Information.** To the extent that we collect, use, or share “sensitive personal information” as that term is defined in applicable California privacy laws, we limit our collection, use or disclosure of such information for permitted business purposes.

**How to Submit a Request.** To take advantage of your right to know, delete, or correct under California law, please contact your HR representative at [HR@kendrascott.com](mailto:HR@kendrascott.com) or toll-free at 1-800-461-9330. We may request certain information to verify your identity before we can respond to your privacy rights request.

To request information we may collect about you as a customer of Kendra Scott, please follow the instructions provided in our [customer-facing privacy policy](#).

**Authorized Agent Requests.** You may authorize someone to make a privacy rights request on your behalf (an authorized agent). Authorized agents will need to demonstrate that you’ve authorized them to act on your behalf. Kendra Scott retains the right to request confirmation directly from you confirming that the agent is authorized to make such a request, or to request additional information to confirm the agent’s identity.

## **5. Changes in Policy**

We reserve the right, at our sole discretion, to change, modify, add, remove, or otherwise revise portions of this Policy at any time. We will notify you of any material changes to our Policy as required by law. We post a copy of this policy in our employee handbook and on the [kendrascott.com](http://kendrascott.com) Careers page.

## **6. Contact Us**

If you have any questions about anything in this Policy or concerns about our use of your Personal Information, please submit your questions or concerns to [HR@kendrascott.com](mailto:HR@kendrascott.com) if you are an employee or contractor, or [careers@kendrascott.com](mailto:careers@kendrascott.com) if you are a job applicant.