

California Associate Privacy Notice

Effective: July 1, 2020

Introduction

Our organization is comprised of many diverse associates dedicated to improving our brands and ensuring the customer experience in our stores is second-to-none. We value your hard work and contributions, and your trust is very important to us. We realize that protecting the privacy of the personal information you entrust to us throughout the course of your employment is crucial. This notice is intended to explain to our associates (as well as owners, directors, officers, or contractors), who are California residents, the practices that the Kroger Family of Companies follow regarding the collection and use of personal information for employment purposes. Personal information is information that identifies you or can be reasonably linked to you.

This notice only discusses how we handle information related to your work at the Kroger Family of Companies. It does not cover information related to your shopping history or loyalty membership with us or information collected by our pharmacies and/or clinics for purposes of providing health care. For information on these areas, please consult our customer privacy policy and notice of privacy practices online on the home page of our websites.

What Personal Information We Collect

We may collect and process the following personal information about or from you, or from publicly available sources, as well as from third-party sources, including references you provide during the course of your employment with the Kroger Family of Companies. Not all categories may be collected about every applicant. The categories of personal information we may collect include:

- Your personal identifiers, including your phone number, physical address and email address, social security number and other government ID numbers, date of birth, IP address and other online identifiers;
- The personal contact information of any emergency contacts you identified;
- The personal contact information of designated references you may have provided us during your application process;
- Your professional and employment-related information, including qualifications, previous education and work experience, performance information, leadership experience, awards, career and job interests and preferences, talent management assessments as well as relevant licenses, professional memberships or salary history where applicable, and your eligibility for employment including age and immigration status;
- Biometric information (including fingerprinting) for employees who work in certain sensitive business areas or for those employees who use time clocks that use an image or representation of their fingerprint for access;
- Background information, including contact information of references, background check and criminal information and drug screening results;
- Financial information such as banking information for direct deposit, pay rate, payroll deduction information, and other information necessary to pay your income tax via withholding according to your preferences and applicable law;
- Health information such as health conditions, if relevant to your employment, job restrictions, workplace accident and illness information;
- Health insurance and other employment benefits information, including information on dependents and beneficiaries necessary to administer benefits;
- Audio and visual information that may be collected from CCTV or other security monitoring that may be in place in the facilities you may work in;
- Protected classifications, including citizenship and immigration status, and (should you choose to provide such information) including race, gender, ethnicity, disability, and military and veteran status;
- Internet and other electronic network activity information while using devices that are property of the Kroger Family of Companies;
- Education information;
- Preferences you have expressed related to choice of working locations, job roles and improvement areas; and
- Other information including information you may provide to us and any other information reasonably necessary for us to carry out our legal and regulatory obligations.

Why We Collect Your Information

We may use your personal information for various purposes during the employment process, including:

- To perform basic employment and management functions, including distributing payroll and providing benefits such as worker's compensation and unemployment insurance, and to monitor and supervise employees;
- To pay employment-associated taxes, both for ourselves and on your behalf;
- To contact the right people in case of an emergency involving you;
- To provide important notices and other information concerning your employment and otherwise correspond with you;
- To evaluate current employees for employment opportunities based on your skills, qualifications, interests and performance;
- To perform crucial human resources tasks, including the collection of information necessary to mitigate public health risks in our facilities, or for the resolution of safety investigations or hostile environment claims;
- To comply with various governmental regulations and oversight, including reporting;
- To inform organization-wide recruiting and/or hiring efforts, including diversity and inclusion initiatives;
- To assist the trade unions we work with in representing you, as required by contracts with them and applicable law;
- To create and maintain your accounts to our internal systems;
- To improve our recruitment and hiring process, including performing analysis of our associate pool;
- To carry out internal record keeping;
- To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity; and
- Other activities as needed for legitimate business purposes or to fulfill our legal obligations.

How We Protect Your Information

We aim to protect personal information by implementing and maintaining reasonable security, such as by using reasonable organizational, technological and physical safeguards appropriate to the sensitivity of the personal information we hold. Moreover, all associates are responsible for complying with Kroger Family of Companies' information security policies and procedures and to report any information security incident concerns immediately.

Accessibility

The Kroger Family of Companies is committed to ensuring that our communications are accessible to individuals with disabilities. If you require a copy of this notice in an alternative accessible format, please contact us at the telephone numbers below.

Questions

Individuals who have questions about this Employee Notice should contact the Kroger Benefits Support Center at 1-877-373-3397 for benefits related questions. For all other questions, contact the Kroger Support Center at 1-800-952-8889.