



BELLA+CANVAS

Workforce Member Privacy Policy

(Applicable to California Residents)

Last Updated: June 2023

Our Commitment to Privacy

Alo, LLC and Bella+Canvas, LLC (the “Company,” “we,” or “us”) have developed and implemented this privacy policy (“Workforce Member Privacy Policy”) to demonstrate our commitment to privacy for California residents who are or are seeking to become a member of the Company’s workforce. This Workforce Member Privacy Policy is designed to assist California workforce members and candidates (“you”) in understanding how we collect, use, share, and safeguard personal information as part of your working relationship with us.

To Whom This Workforce Member Privacy Policy Applies

This Workforce Member Privacy Policy applies to individuals in connection with their status as a workforce member or candidate (collectively “workforce members”). Our privacy practices with respect to personal information collected in other contexts, including visiting the Company website(s), can be found in our general [ALO Privacy Policy \(https://www.aloyoga.com/pages/privacy-policy\)](https://www.aloyoga.com/pages/privacy-policy) and Bella+Canvas Privacy Policy (<https://www.bellacanvas.com/privacy-policy>). This Workforce Member Privacy Policy is supplemental to our general Privacy Policies.

Except as may be specifically required by law, this Workforce Member Privacy Policy does not apply to information available from a public source (such as a telephone directory) or to aggregated or de-identified information we may collect about our workforce, nor to references to workforce members in company work product. This Workforce Member Privacy Notice is intended to comply with the California Consumer Privacy Act (the “CCPA”).

How We Define Personal Information

Personal information is a broadly defined term whose legal definition varies across jurisdictions. When used in this Workforce Member Privacy Policy, “personal information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an individual.

How to Read and Understand this Policy

To make this policy clear and easy to understand, we have broken it up into specific sections. The first section, the “**Notice at Collection**” provides notice about the categories of personal information we collect about you, the purposes for which we use the personal information (including if we sell or share your



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personal information, and how long we retain the information. The next section, “**Your Privacy Rights**” describes your legal rights pursuant to the California Consumer Privacy Act and how you may exercise those rights.

Notice at Collection

This Notice at Collection is incorporated into our Workforce Member Privacy Policy and provides notice of our personal information collection and use practices with respect to California residents who are or are seeking to become a member of the Company’s workforce members. For ease of reference, we have presented the relevant information in a chart explaining our collection, use, and disclosure practices related to workforce members. You can learn more about our specific practices by reading our more detailed disclosures below the chart.

Categories of Personal Information	Categories of Sources from which the Information was Collected	Categories of Third Parties to whom this type of Personal Information is Disclosed for a Business Purpose	Types of Third Parties with Whom this Category of Personal Information Is Shared/Sold
Identifiers (e.g., name, signature, address, telephone email, account name, SSN, DL number, passport number, online identifier, IP address)	<ul style="list-style-type: none"> • Workforce Members • Company Affiliates • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Governmental Entities 	<ul style="list-style-type: none"> • Workforce Members • Company Affiliates • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Governmental Entities 	We do not sell or share
Customer Records (as defined in Cal. Civ. Code § 1798.80(e))	<ul style="list-style-type: none"> • Workforce Members • Company Affiliates • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Governmental Entities 	<ul style="list-style-type: none"> • Workforce Members • Company Affiliates • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Governmental Entities 	We do not sell or share
Protected Classifications (e.g., Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status).	<ul style="list-style-type: none"> • Workforce Members • Candidate Recruiting Partners • Governmental Entities • Company Affiliates 	<ul style="list-style-type: none"> • Workforce Members • Company Affiliates • Human Resources Service Providers • Business Operations Service Providers • Candidate Recruiting Partners • Governmental Entities 	We do not sell or share
Commercial Information (e.g., records of personal property, products or	We do not collect commercial information in the context of a workforce member relationship.		We do not sell or share



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services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies).			
Biometric Information (e.g., fingerprints, face maps).	<ul style="list-style-type: none"> • Workforce Members 	<ul style="list-style-type: none"> • Workforce Members • Business Operations Service Providers 	We do not sell or share
Internet/Network Activity (e.g., your interactions with device, software, websites, and networks we operate or use).	<ul style="list-style-type: none"> • Workforce Members • Business Services Providers 	<ul style="list-style-type: none"> • Workforce Members • Business Services Providers • Company Affiliates • Human Resources Service Providers 	We do not sell or share
Geolocation Data	We may gather your geolocation based on your address, IP address, or other data associated with a particular location. If you are using company-equipment that collects geolocation, we may associate that geolocation with you.	<ul style="list-style-type: none"> • Workforce Members • Business Services Providers • Company Affiliates • Human Resources Service Providers 	We do not sell or share
Sensory Data (e.g., audio, electronic, visual, thermal, olfactory, or similar information).	We may collect your image, voice, electronic activity, or other sensory data through recording devices such as a security camera or call recording device.	<ul style="list-style-type: none"> • Workforce Members • Business Services Providers • Company Affiliates • Human Resources Service Providers 	We do not sell or share
Professional or employment-related information (e.g., current or past job history or performance evaluations).	<ul style="list-style-type: none"> • Workforce Members • Candidate Recruiting Partners • Human Resources Service Providers • Governmental Entities 	<ul style="list-style-type: none"> • Workforce Members • Company Affiliates • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Governmental Entities 	We do not sell or share
Education Information (e.g., 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).	<ul style="list-style-type: none"> • Workforce Members • Educational institutions • Candidate Recruiting Partners 	<ul style="list-style-type: none"> • Workforce Members • Company Affiliates • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Governmental Entities 	We do not sell or share



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Inferences drawn from other personal information (e.g., profile information reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes).	We do not collect inferences, but we may make inferences about workforce members based on the personal information we have collected. For example, we may make inferences regarding a workforce members’ suitability for a particular position or task.	We do not disclose inferences we make outside of the company, but we may store inferred personal data with our Business Service Providers (for example, our cloud storage providers).	We do not sell or share
Sensitive Personal Information, including the following: <ul style="list-style-type: none"> • Government ID’s • Precise Geolocation • Demographic Information • Email contents • Biometric Information • Health Information 	<ul style="list-style-type: none"> • Workforce Members • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Governmental Entities 	<ul style="list-style-type: none"> • Workforce Members • Company Affiliates • Candidate Recruiting Partners • Human Resources Service Providers • Business Services Providers • Governmental Entities 	We do not sell or share

We may disclose any personal information where necessary to comply with a legal obligation, to ensure the safety and security of the Company and its workforce members, as part of a corporate reorganization, or where we determine it is appropriate in our sole discretion and consistent with applicable law.

What Personal Information We Collect

The Personal Information that we collect and use about you may include:

- **Application information** as part of your candidacy to become a workforce member (e.g., resume, C.V., application form information; transcripts, recommendations letters, interview recordings and transcripts, and other application materials).
- **Contact information**, e.g., name, email address, telephone number, postal address.
- **Personal details**, e.g., title, name preferences, and date of birth.
- **Right to Work information**, e.g., work permit/visa application information.
- **Payroll information**, e.g., bank account details and tax information.
- **Benefits information**, e.g., information to provide and maintain retirement, health, and other benefit program services or products.
- **Biometric information**, e.g., fingerprints, face prints/maps, and health screening information.
- **Medical and/or health information**, e.g., medical examination results, vaccination status, reported medical and health conditions.
- **Performance evaluation information**, e.g., information about and assessments of your performance collected as part of the employee review process.



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- **Location information**, including through GPS tracking technology on devices owned by us or other devices owned by you which you use in connection with your services to the Company.
- **Attendance records**, e.g., time clock records.
- **Security information**, e.g., security badge information, CCTV recordings, premises access logs, and video surveillance footage.
- **Safety and disciplinary information**, e.g., information in connection with disciplinary action or investigations.
- **Systems information**, i.e., information about your use of our systems or information that you provide to us through our systems (e.g., information from your company email account, information posted on our website, information you submit through applications or software made available to you).
- **Payment information** you provide for goods, services, and other transactions authorized by you in your capacity as workforce member, such as travel expenses.
- **Other information**. Any other information that you provide directly to us or that we receive in connection with your working relationship the Company.

How We Collect and Disclose Workforce Member Personal Information

The purpose for which personal information will be collected and processed will be consistent with your role as a workforce member at the Company. Because each workforce members relationship with the company varies based on that person's role, location, experience, performance, and other factors, the type, nature, and amount of personal information the Company may seek to collect from you or process about you will vary.

Collecting Personal Information

We collect personal information about our workforce members from a variety of sources, but primarily from the members themselves. In addition, we gather personal information through workforce members' interaction with the Company's systems and personnel, and we receive personal information from third parties who provide it to us. The following is a list of the sources from which we may collect personal information.

- **Candidate Recruiting Partners**. These are the persons or entities who assist in facilitating recruitment and review of candidates to become workforce members. These entities include recruiting firms, job search services, social media companies (e.g., LinkedIn), and professional recruiting agents. We may also collect personal information from any other person or entity with whom you provide a reference, including past employers, personal references, former colleagues, and others.
- **Employers**. When we work with an employer to provide placements for individuals or other services, we collect personal information about the individuals for whom we are providing placement and about the individuals with whom we engage on the employer's side.



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- **Human Resources Service Providers.** These are the persons or entities who assist in providing human resources and workforce management services, including background check providers, human resources software services providers, insurance providers, employee payment and benefits providers, governmental entities, and similar entities.
- **Business Services Providers.** These are those persons or entities with whom we have a relationship to provide business operations services and support to the Company. These providers may include the following:
 - **IT Operations Providers.** These include cloud computing service providers, internet service providers, data backup and security providers, functionality and infrastructure providers, and similar service providers.
 - **Professional Service Providers.** These include lawyers, accountants, consultants, security professionals, and other similar parties when disclosure is reasonably necessary to comply with our legal and contractual obligations, prevent or respond to fraud or abuse, defend ourselves against attacks, or protect the rights, property, and safety of us, our customers, and the public.
 - **Operations Providers.** These include service provider with whom we partner to provide day-to-day business operations, including real estate advisors, event planners, food services providers, entertainment providers, payment processors, banks, facilities management providers.
- **Affiliates.** Our affiliates include our parent company, subsidiaries, joint venturers, or other companies that we control or that are under common control with us.
- **Governmental Entities:** These are governmental agencies that may provide information about workforce members.

We may also collect personal information from any other person or entity with whom you interact in the scope and course of a workforce members affiliation with the Company. For example, we may collect personal information about you from customers, business contacts, and the public.

Disclosing Personal Information

We may disclose personal information to any of the entities identified as sources of personal information. We may also disclose any personal information to the following:

- **Customers.** We disclose personal contact information to customers as part of the normal customer service relationship.
- **Company Affiliates.** We disclose personal information about our workforce members to other entities affiliated with the Company, including our parent and subsidiary companies.



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- **Legally Required Parties.** Persons to whom we are required by law to provide information, such as pursuant to a subpoena or a court order.
- **Reorganization Recipients.** Persons involved in the consideration, negotiation, completion of a business transaction, including the sale, merger, consolidation, acquisition, change in control, transfer of substantial assets, bankruptcy, or reorganization, and any subsequent integration.
- **Authorized Recipients:** To any party when authorized by the individual to whom it pertains to share it.

How We Use Workforce Member Personal Information

We use the personal information we collect as follows:

- **To Process Employment Applications and Onboard New Hires.** We collect most personal information to evaluate your candidacy, including to open and maintain candidate records, communicate with you, conduct employment related background screening and checks, and evaluate your application.
- **Recruiting and Workforce Member Communications.** We use personal information to communicate with you as part of the candidacy process and as part of your workforce relationship with us. Personal information may be used to evaluate career development, consider candidates for roles and positions, and to communicate company policies.
- **Business operations.** We use personal information to conduct our business operations, including management of staffing resources, financial planning, corporate compliance, internal audits and other business administration needs.
- **Compensation and Benefits Management.** We collect and process personal data to provide payment and benefits to our workforce members and to ensure we are legally compliant when doing so.
- **Onboarding and Training.** We collect data for integrating new hires into our systems and to provide staff training, feedback, disciplinary procedures, and investigations to meet our business interests in ensuring our workforce members are best able to carry out their roles.
- **For Diversity and Equal Opportunity Monitoring.** Where permitted by law, you have the option to provide certain sensitive personal information, such as race or ethnic origin, for the purposes of equal opportunities monitoring. If you decide not to provide this information, your application will not be prejudiced. You may also tell us if you have a disability, so that we can make appropriate arrangements for you to attend our offices and/or participate in an interview.
- **To Maintain Security at Our Premises.** If you attend in-person interviews at our offices or facilities, we may collect information related to your access to our building. This may include data related to your use of security control systems, audio and video captured on security cameras, and visitor logging information.



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- **To Conduct Evaluations.** We collect and review your personal information from multiple sources to assess your suitability for employment or work with the Company. This may include obtaining pre-employment background checks.
- **Safety and Security Purposes.** We use personal information in connection with the monitoring of our physical and digital systems (which includes using technology to monitor your interaction with our devices and systems). We also use it to report on security and safety incidents, notify emergency contacts, and provide reasonable care when applicable. We do so to ensure the safety and security of the Company, its property, and others, and for the prevention, detection, or investigation of fraud, suspected or actual illegal activity, or other misconduct, and the resultant harms or impacts to individuals.
- **Travel and Entertainment.** We use personal information to ensure the proper capture and reimbursement of travel, personal, and other expenses.
- **Enforce our Company Policies.** We use personal information to support and maintain compliance with our company policies, procedures, and operations.
- **Required Disclosures:** We may disclose personal information to comply with applicable legal and regulatory requests and obligations including investigations.
- **Legal Defense:** We may process personal information to establish or defend legal claims and allegations.
- **Harmful Activity Prevention:** We process personal information in connection with the prevention, detection, or investigation of fraud, suspected or actual illegal activity, or other misconduct and the resultant harms or impacts to individuals. For example, we use biometric identifiers associated with fingerprints to ensure accurate time-keeping and prevent fraud or other illegal activities.
- **Professional Advice:** We may process personal information in connection with seeking advice from lawyers, auditors, and other professional advisors.
- **For Similar Purposes:** When necessary or advisable we may process your personal information for purposes like those mentioned above, and consistent with the purpose for which you provided your personal information.

Retention of Personal Information

We will retain personal information only for so long as necessary to fulfill the purposes for which we collected it, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal information, we consider: (i) the amount, nature, and sensitivity of the personal information; (ii) the potential risk of harm from unauthorized use or disclosure of your personal information; (iii) the purposes for which we process your personal information and whether we can achieve those purposes through other means; and (iv) the applicable legal requirements. In some circumstances, you may ask us to delete your personal information. Additionally, we may anonymize your personal information (so that it can no longer be associated with you) for



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research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

How We Protect Personal Information

We have implemented and maintain reasonable security procedures and practices, appropriate to the nature of the information, to protect your personal information from unauthorized access, destruction, use, modification, or disclosure. However, no security measure is perfect, so we cannot guarantee the security of your personal information. Periodically, our operations and business practices are reviewed for compliance with policies and procedures governing the security, confidentiality, and quality of our information. In general, our business practices limit employee access to confidential information and limit the use and disclosure of such information to authorized persons, processes, and transactions.

Your Privacy Rights

California Residents have certain rights under the CCPA. For information on how to exercise these rights, please see below.

- **The Right to Know.** The right to know what personal information the Company has 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, selling, or sharing personal information, the categories of third parties to whom the business discloses personal information, and the specific pieces of personal information the business has collected about you;
- **The Right to Deletion.** The right to delete personal information that the business has collected about you, subject to certain exceptions;
- **The Right to Correction.** The right to correct inaccurate personal information that a business maintains about a California resident;
- **The Right to Opt-Out of the Sale/Sharing.** If we sell or share personal information, the right to opt-out of the sale or sharing of your personal information by the Company;
- **The Right to Limit the Use of Sensitive Personal Information.** If the Company uses or discloses sensitive personal information for reasons other than those permitted by the CCPA, the right to limit the use or disclosure of sensitive personal information by the Company;
- **Non-Discrimination.** The right not to be discriminated against for exercising any of the rights conferred by the CCPA.

The Company will honor the privacy rights afforded to individuals in accordance with applicable law.

Exercising Your CCPA Rights



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Workforce Members who are California residents may submit CCPA requests themselves or using an authorized agent. CCPA requests are subject to our verification measures which vary depending on the type of request made and the sensitivity of the information you request. We may ask you to provide a few pieces of information to confirm your identity in our records. If you authorize an agent to submit a request on your behalf, we may require the agent to provide proof that you gave the agent signed permission to submit the request and may verify the agent's identity and authority to act on your behalf.

- **Submitting Access, Deletion, and Correction Requests**

To make an access, deletion, correction, or limitation request, please email us at hr@aloyoga.com or hr@bellacanvas.com.

- **Limiting the Use of Your Sensitive Personal Information**

Californians have the right to limit a business's use or disclosure of sensitive personal information. However, the Company does not use or disclose sensitive personal information for any purpose other than for permissible purposes under the CCPA.

- **Opting Out of the Sale/Share of Your Personal Information**

The Company does not sell or share personal information related to the workforce member relationship. Please review the [ALO Privacy Policy \(https://www.aloyoga.com/pages/privacy-policy\)](https://www.aloyoga.com/pages/privacy-policy) and Bella+Canvas Privacy Policy (<https://www.bellacanvas.com/privacy-policy>) for more information about opt-out rights for website visitors.

Contact Us Regarding Your Privacy Rights

If you would like additional information related to your privacy, please email us at hr@aloyoga.com or hr@bellacanvas.com. Please submit your CCPA rights requests using the methods described above.

Updates to Our Workforce Member Privacy Policy

We may update this Workforce Member Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the Notice and, in some cases, we may provide you with additional notice (such as adding a statement to our website homepage or sending you a notification).

Contacting Us

To ask questions or comment about this Workforce Member Privacy Policy and our privacy practices, contact us at hr@aloyoga.com or hr@bellacanvas.com.