

California Consumer Privacy Act Notice of Collection of Personal Information for Employees and Contractors

Effective Date: January 1, 2023

QDOBA Restaurant Corporation (“QDOBA” or “we” or “us” or “our”) understands that protecting and respecting the privacy of your personal information is important. This Notice of Collection (“Notice”) describes how QDOBA handles your Personal Information (as defined below), including Sensitive Personal Information (as defined below), we collect or otherwise process with regard to current and former employees, owners, directors, officers, medical staff members, job applicants, and independent contractors that are California residents (each an “employee”). Please note that neither this Notice of Collection nor our California Employee Privacy Policy applies to any information collected from you when you are acting as regular consumer or customer of QDOBA (e.g., ordering through the QDOBA app). Please consult our general [Privacy Policy](#) for more information on our general privacy practices. If you have any questions about the information below, please contact Human Resources.

This Notice neither creates nor forms part of any contract of employment or other service agreement and applies only to employees that are California residents. We may update this Notice at any time as necessary. It is important that you read this Notice, so you are aware of how and why we use your Personal Information.

QDOBA collects and receives certain Personal Information from and about you during the course of hiring, contracting, employing or otherwise engaging you, and may continue to receive some Personal Information from you from time to time during and after the course of your work for QDOBA. As used herein, “Personal Information” refers to any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular employee or household.

QDOBA may also collect and receive Sensitive Personal Information from and about you in the ordinary course of business. “Sensitive Personal Information” means an employee’s health-related Personal Information or Personal Information that reveals an employee’s social security; driver’s license; state identification card; passport number; account log-in, financial account, debit card, or credit card number, in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin; religious or philosophical beliefs; union membership; mail, email, or text message content, unless QDOBA is the intended recipient of the communication; genetic data; biometric information for unique identification purposes; or sex life or sexual orientation.

We do not, and will not, sell the Personal Information or Sensitive Personal Information we collect or receive from or about you or any other employees, including any individuals under the age of 16. We also do not, and will not, share any Personal Information or Sensitive Personal Information we collect from you or other employees with third parties for cross-context behavioral advertising, including any individuals under the age of 16.

Information about our collection and use of personal information of guests of QDOBA restaurants, visitors to our websites, and users of our mobile application may be found in the general QDOBA [Privacy Policy](#). Additionally, when employees interact with QDOBA outside of the employment context, such as by being a guest in our restaurants, visiting our websites, or using our mobile application, then our general [Privacy Policy](#) will apply to the personal information collected in this context. The QDOBA Privacy Policy may be found at <https://www.QDOBA.com/privacy>.

QDOBA may collect or receive the following categories of Personal Information and Sensitive Personal Information about employees. Not all categories will be collected for every employee. Information is collected based on the need. The tables below also lists, for each category, whether we have collected such information in the last twelve (12) months our expected retention period and use purposes.

PERSONAL INFORMATION CATEGORY	DESCRIPTION	COLLECTED IN PAST TWELVE (12) MONTHS	RETENTION PERIOD (in absence of a deletion request or legal requirement)	USE PURPOSES
Identifiers	<i>include both direct identifiers like a name or an address, and identifying numbers like an applicant/employee ID number, as well as identifying information about devices you use to connect to QDOBA's infrastructure and applications.</i>	Yes	7 years after cessation of employment	<ul style="list-style-type: none"> • Company Operations • Recruitment and Hiring • Workforce Management • Physical and Technical Security • Onboarding • Timekeeping • Compensation and Benefits • Travel and Expenses • Internal Training and Education • Fraud Prevention, Audits, and Investigations • Restaurant Offerings and Operations • Restaurant Safety, Security, and Health • Legal Compliance
Legally-Protected Information	<i>includes personal information protected by California or federal laws such as date of birth, gender, military status, or other.</i>	Yes	7 years after cessation of employment	<ul style="list-style-type: none"> • Company Operations • Recruitment and Hiring • Workforce Management • Onboarding • Compensation and Benefits • Travel and Expenses • Internal Training and Education • Legal Compliance
Professional or Employment-Related Information	<i>includes information such as organizational position, current or past job history or performance evaluations, salary, hours worked, training, job positions, work communications, etc.</i>	Yes	7 years after cessation of employment	<ul style="list-style-type: none"> • Company Operations • Recruitment and Hiring • Workforce Management • Physical and Technical Security • Onboarding • Timekeeping • Compensation and Benefits • Travel and Expenses • Internal Training and Education

PERSONAL INFORMATION CATEGORY	DESCRIPTION	COLLECTED IN PAST TWELVE (12) MONTHS	RETENTION PERIOD (in absence of a deletion request or legal requirement)	USE PURPOSES
				<ul style="list-style-type: none"> • Legal Compliance
Commercial Information	<i>includes information about services or products purchased, or consuming history or tendencies. In the case of employees this would be focused on business expenses.</i>	Yes	7 years after expense incurred	<ul style="list-style-type: none"> • Company Operations • Workforce Management • Travel and Expenses • Internal Training and Education • Fraud Prevention, Audits, and Investigations • Legal Compliance
Internet or Other Similar Network Activity	<i>includes information that QDOBA may have collected about browsing history, searches, interaction with a website or application, and information about the devices and the use of the devices that connect to QDOBA's infrastructure and applications.</i>	Yes	2 years after collection	<ul style="list-style-type: none"> • Company Operations • Workforce Management • Physical and Technical Security • Fraud Prevention, Audits, and Investigations • Restaurant Offerings and Operations • Legal Compliance
Non-Public Education Information	<i>includes information directly related to a student that is maintained by educational institutions. For employees, this is typically related to job applications or tuition reimbursement, if available.</i>	Yes	7 years after cessation of employment	<ul style="list-style-type: none"> • Company Operations • Recruitment and Hiring • Workforce Management • Legal Compliance
Sensory Information	<i>includes audio, visual, or other similar types of information, such as pictures, videos, or voice recordings.</i>	Yes	7 years after cessation of employment	<ul style="list-style-type: none"> • Company Operations • Recruitment and Hiring • Workforce Management • Physical and Technical Security • Fraud Prevention, Audits, and Investigations • Restaurant Safety, Security, and Health • Legal Compliance
Geolocation Data	<i>includes general geolocation information,</i>	No	N/A	N/A

PERSONAL INFORMATION CATEGORY	DESCRIPTION	COLLECTED IN PAST TWELVE (12) MONTHS	RETENTION PERIOD (in absence of a deletion request or legal requirement)	USE PURPOSES
	<i>but not precise geolocation, which is Sensitive Personal Information.</i>			
Inferences Draw from Other Personal Information	<i>is a profile drawn from other information that reflects a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</i>	No	N/A	N/A

SENSITIVE PERSONAL INFORMATION CATEGORY	DESCRIPTION	COLLECTED IN PAST TWELVE (12) MONTHS	RETENTION PERIOD (in absence of a deletion request or legal requirement)	USE PURPOSES
Government Identifiers	<i>includes an employee's social security, driver's license, state identification card, or passport number</i>	Yes	7 years after cessation of employment	<ul style="list-style-type: none"> • Company Operations • Workforce Management • Physical and Technical Security • Onboarding • Compensation and Benefits • Travel and Expenses • Fraud Prevention, Audits, and Investigations • Legal Compliance
Account Credentials	<i>includes log-in user names, account numbers, or card numbers combined with required access/security code or password</i>	Yes	2 years after cessation of employment	<ul style="list-style-type: none"> • Company Operations • Workforce Management • Physical and Technical Security • Timekeeping • Compensation and Benefits • Fraud Prevention, Audits, and Investigations • Legal Compliance

Precise Geolocation	<i>includes any data that is derived from a device and that is used or intended to be used to locate an employee within a geographic area that is equal to or less than the area of a circle with a radius of 1,850 feet.</i>	No	N/A	N/A
Racial or Ethnic Origin	<i>includes an employee's race and ethnic or cultural origins</i>	Yes	7 years after cessation of employment	<ul style="list-style-type: none"> • Physical and Technical Security • Internal Training and Education • Fraud Prevention, Audits, and Investigations • Restaurant Safety, Security, and Health • Legal Compliance
Religious or philosophical beliefs	<i>includes an employee's religion, spirituality, and religious or philosophical beliefs</i>	No	N/A	N/A
Union Membership	<i>includes an employee's membership or participation in a union or other collective bargaining group</i>	No	N/A	N/A
Mail, Email, or Text Messages	<i>includes the contents of an employee's mail, email, or text messages that are not directed to QDOBA</i>	Yes	2 years after cessation of employment	<ul style="list-style-type: none"> • Physical and Technical Security • Internal Training and Education • Fraud Prevention, Audits, and Investigations • Restaurant Safety, Security, and Health • Legal Compliance
Unique Identifying Biometric Information	<i>includes an employee's biometric information used to uniquely identify that employee</i>	No	N/A	N/A
Health, Sex Life, or Sexual Orientation Information	<i>includes Personal Information concerning an employee's health, sex life, or sexual orientation or preferences</i>	Yes	7 years after cessation of employment	<ul style="list-style-type: none"> • Company Operations • Workforce Management • Compensation and Benefits • Legal Compliance

Updates to this Notice

This Notice will be posted with other employee notices, will be made available electronically, and may be updated periodically to reflect any changes in our privacy practices. We encourage you to check this notice periodically to be aware of the most recent version.