

Employee and Staff Privacy Notice

Last Updated: June 19, 2023

Scope and Overview

Sprouts Farmers Market, Inc. (together with its affiliates, **"Sprouts," "we," "us,"** or **"our"**) are committed to protecting the privacy and security of your personal information. This Employee and Staff Privacy Notice (the **"Privacy Notice"**) describes how we may collect and process personal information about you before, during, and after your working relationship with us, in accordance with applicable data protection and privacy laws. This Privacy Notice applies to all current and former employees, workers, contractors and any other individuals who are working for Sprouts but are not directly employed (collectively, **"staff member(s)"** or **"you"**).

This Privacy Notice describes the categories of personal information that we collect, how we use your personal information, how we secure your personal information, when we may disclose your personal information to third parties, and when we may transfer your personal information outside of your home jurisdiction. This Privacy Notice also describes your rights regarding the personal data that we hold about you.

Please read this Privacy Notice carefully. If you have any questions or need to access this Privacy Notice in an alternative format due to having a disability, please contact us at LOA@Sprouts.com or call us at (480) 385-2300.

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1. Personal Information We Collect About You

To carry out our activities and obligations as an employer, we may collect, store, and process different types of personal information, some of which are required to administer the employment or other working relationship with you.

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The following provides examples of the categories of personal information we may collect and how we process such information.

Context	Examples of Categories of Information	Primary Purpose for Processing Information
Identification Information	Name, date of birth, employee identification number, government-issued identification number (e.g., driver's license number, state identification card, passport, national identification number, Native American tribal document, birth certificate, social security number, etc.), residency and work permit status, and other similar documents used to verify work eligibility.	We may process this type of information for our legitimate business purposes, including general human resources administration and to comply with legal obligations, such as employment eligibility verification laws.
Contact Information	Home address, telephone number(s), e-mail address(es), beneficiary and emergency contact details, and other similar contact information.	<p>We may process this type of information to fulfil our obligations under your employment contract, offer letter, or other contractual commitments we've made to you, including managing our employment or working relationship with you (e.g., communicating with you).</p> <p>We also may process this type of information for our legitimate business purposes, such as to assist you in the case of an emergency, including maintenance of contact details for you, and your dependents or emergency contacts in the case of a personal or business emergency.</p>
Payroll and Taxes	Rate of pay, salary, bonus, bank account details, tax status and withholding information (i.e., marital status, dependents, etc.),	We may process this type of information to fulfil our obligations under your employment contract, offer letter,

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	social security number or other taxpayer/government identification number, and other information necessary to administer payroll and taxes.	or other contractual commitments we've made to you, including administering payroll and benefits, making expense reimbursements and other compensation-related payments, and tax reporting.
Benefits	Spouse, beneficiary, and dependents information, retirement account information, paid and unpaid leaves of absence, and other information necessary to administer	We process this type of information to fulfil our obligations under your employment contract, offer letter, or other contractual commitments we've made to you, including administering and maintaining benefits, such as medical dental, optical, additional wellness programs, 401(k) and/or retirement plans and additional fringe benefit programs, including recording and processing eligibility of dependents, absence and leave monitoring, and insurance.
Health Related	Information about job-related medical conditions that impact your ability to perform your job with or without a reasonable accommodation, and health and sickness related information related to reasons for time away from work.	We process this type of information for our legitimate business purposes (where permissible and in accordance with applicable law), including ascertaining your fitness to perform your job duties with or without a reasonable accommodation, managing absences from work, and complying with legal obligations related to health and safety.
Demographic Data	Please note, under federal and some local laws, we are required to collect and report certain demographic workforce data to federal, state and or local government agencies for civil rights enforcement purposes. Your submission of this	We process this type of information for a variety of reasons. In some jurisdictions, we are required to collect and report certain demographic workforce data to federal, state and or local government agencies.

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	<p>information is voluntary. This includes date of birth and gender as well as more sensitive personal information including information relating to racial and ethnic origin, religious, political or philosophical beliefs, and trade union membership. We may also ask you to voluntarily self-identify whether you belong to additional protected classes (disability status, sexual orientation, veteran status, etc.), to promote diversity, equity, and inclusion within the company.</p>	<p>We also process this type of information for our legitimate business purposes (where permissible and in accordance with applicable law), including promoting diversity, equity, and inclusion within the company.</p>
<p>Recruitment</p>	<p>Educational and professional background information, such as academic and professional qualifications, education, CV/Resume, reference letters, interview notes, credit history and criminal records data (utilized for background check and vetting purposes where permissible and in accordance with applicable law).</p>	<p>We process this type of information for our legitimate business purposes, including determining eligibility for hiring, verifying references and qualifications, and making business decisions about your recruitment or employment.</p> <p>We also process this type of information to fulfil our obligations under your employment contract, offer letter, or other commitments we've made to you, including general human resources administration and business management.</p>
<p>Terms of Employment</p>	<p>Employment details, such as your job titles/position, office location, letters of offer and acceptance of employment, and/or employment agreements or other working arrangements, hire/re-hire date, termination date, performance history, disciplinary information, professional memberships, and business travel arrangements,</p>	<p>We process this type of information to fulfil our obligations under your employment contract, offer letter, or other commitments we've made to you, including managing our employment or working relationship with you, conducting performance reviews, managing and determining performance requirements, making decisions about salary reviews and</p>

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	leave of absence, sick time, and vacation/holiday records.	<p>compensation, assessing qualifications for a particular job or task, including decisions about promotions, making decisions about your continued employment or engagement.</p> <p>We also process this type of information for our legitimate business purposes, including general business management and operations, accounting and auditing.</p>
Qualifications and Training	We collect information from individuals concerning the training that they receive from us, or from third parties. Where applicable, we also collect information related to licensing and certifications.	We process this type of information for our legitimate business purposes, including establishing training and/or development requirements, understanding and recording qualifications of the individuals that work with us, and in some cases complying with any statutory, regulatory, or contractual obligation regarding the training or qualification of certain staff.
Investigations	Details of any workplace investigations.	We process this type of information for our legitimate business purposes, including ensuring a safe working environment, investigating all information related to potential violations of workplace policies, procedures, protocols, concerns, and/or complaints.
IT and Communications Information	Information about your use of our information technology (IT) and communications systems. For more information about what we monitor and why, please refer to the Sprouts Information Security Policy.	We process this type of information for our legitimate business purposes (where permissible and in accordance with applicable law), including managing network and IT systems security, monitoring the use of our IT and communication

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		systems, ensuring compliance with our internal policies and procedures, protecting confidential information, intellectual property, and other business interests, and investigating unlawful or improper acts.
Video, Voice and Images	Audio visual information, such as photographs, video images like closed-circuit television (“CCTV”), call monitoring records, and voicemails.	We process this type of information for our legitimate business purposes (where permissible and in accordance with applicable law), including compiling and maintaining internal directories (such as directories of employees and staff), securing our facilities and equipment, and protecting our property.

2. How We Collect Your Personal Information

Most often, we collect personal information from you directly, including through the application and recruitment process as well as in the course of your employment or working relationship with us.

In some cases, we also collect personal information about you from third parties, such as employment agencies, former employers, and personal and professional references, or public sources. For example, before and during the course of your employment or working relationship with us, we may collect information from public social media sources, such as your LinkedIn profile, for recruitment purposes. We may also conduct lawful background screenings, to the extent permitted by law, through a third-party vendor for information about your past education, employment, credit and/or criminal history. Before we conduct a background check, we will provide you with acknowledgement and authorization forms. Additionally, if there is an investigation of an employee matter, we may obtain information relevant to the incident from external sources including private parties and/or law enforcement.

We will also collect additional personal information in the course of job-related activities. This may include monitoring communications and use of the company's IT equipment and systems, or from other staff members or supervisors. For more information about what we monitor and why, please refer to the Sprouts Information Security Policy.

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3. How We Use Your Personal Information

In addition to the purposes and uses described elsewhere in this Privacy Notice, we may process your personal information for the following purposes:

- To manage your employment or other working relationship with us, including payroll and benefits administration, business management and planning, processing employee work-related claims (for example, insurance and worker's compensation claims); accounting and auditing, conducting performance reviews and determining performance requirements, and assessing qualifications for a particular job or task.
- To comply with applicable legal and regulatory obligations, including those related to labor and employment, health and safety, tax, and anti-discrimination laws.
- To ensure a safe working environment, including investigating potential misconduct.
- To protect health and safety in the workplace.
- To detect and protect against malicious, deceptive, fraudulent, or illegal activity, violations of our policies, or other types of wrongdoing.
- To enforce, exercise, or defend legal claims, and enforce disciplinary actions or termination.
- To ensure network and information security, including preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution. This may include monitoring communications and use of company IT equipment and systems (where permitted by, and in accordance with, applicable law). For more information about what we monitor and why, please refer to the Sprouts Information Security Policy.
- To conduct data analytics analyses to review and better understand employee retention and attrition rates.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.
- For other lawful or legitimate purposes which may be reasonably to plan, organize, and carry out administrative tasks required for day-to-day operations.

4. How We Share Your Personal Information

In addition to the specific situations discussed elsewhere in this Privacy Notice, we share your personal information in the following situations, where permitted or required by applicable law:

- **Affiliates.** We share your information with our subsidiaries and affiliates in the course of our normal business operations.

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- **Business Transactions.** We may share your information with a potential buyer (and its agents and advisors) in connection with any proposed merger, acquisition, or any form of sale or transfer of some or all of our assets (including in the event of a reorganization, dissolution, or liquidation), in which case, personal information held by us about you will be among the assets transferred to the buyer or acquirer.
- **Other Staff Members.** Other individuals within our company may have access to your information. For instance, all staff members can access phone and electronic directories. Depending upon the type of processing and its purposes, your personal information may be shared with staff members within the Human Resources, Finance or IT Department, staff members in charge of the security of company facilities, your supervisor, and your supervisor's supervisor.
- **Service Providers.** We share your information with our contractors, vendors, and service providers that assist us with administering the employment or working relationship with you and/or provide services to us or on our behalf. For example, service providers may include, but are not limited to, payroll processors, benefits administration providers, data storage or hosting providers, marketing/events agencies, and recruitment agencies.
- **Other Third Parties.** We may share certain information with third parties who provide professional services (such as attorneys, auditors, accountants, and management consultants), professional bodies, and regulatory authorities in the normal course of business.
- **Legal or Regulatory Requests and Investigations.** We may disclose your information to third parties under the following circumstances (i) to comply with relevant laws or regulations, to respond to a court order, administrative or judicial process, such as a subpoena, warrant, court order, or government audit; (ii) in response to lawful requests by public authorities (such as national security or law enforcement); and (iii) as necessary to establish, exercise or defend against potential, threatened or actual litigation (such as adverse parties in litigation). We may also need to share your information with tax authorities, courts, regulators, the police, and other governmental authorities where we are required or permitted to do so by law.
- **Protection of the Company or Others.** We may share your information where necessary to protect the company, including to investigate, prevent, or take action regarding possible illegal activities, suspected fraud, safety of person or property, or a violation of our policies.
- **Disclosures with Your Consent.** We may ask to share your information with other unaffiliated third parties who are not described elsewhere in this Privacy Notice. For example, we may share your information with third parties to whom you or your representatives authorize us to disclose personal information in connection with products or services we or they provide to you.

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5. How Long We Retain Your Personal Information

Except as otherwise permitted or required by applicable law or regulation, we endeavour to retain your personal information only for as long as necessary to fulfil the purposes for which it was collected, as required to satisfy any legal, accounting, or reporting obligations, or as necessary to resolve disputes. To determine the appropriate retention period for personal information, we consider applicable legal requirements, the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of your personal information, and the purposes for which we process your personal information.

Generally, this means we will keep your personal information until the end of your employment or other working relationship with us, plus a reasonable period of time thereafter (typically a maximum of 7 years) where necessary to respond to any employment inquiries; to any legal, tax, accounting or administrative matters; or to provide you with ongoing benefits. We may retain your personal information for longer than 7 years (i) if law authorizes, expressly or explicitly, a longer period or prescribes a shorter period; and (ii) if at the end of such 7-year period, the processing of the personal information would still be required for the purpose of legal proceedings or would still be required by applicable law. Details of retention periods for your personal information are available in our Record Retention Policy which is available from your supervisor or on the Vine.

6. How We Protect Your Personal Information

We maintain reasonable physical, technical, and procedural safeguards that are appropriate to the sensitivity of the personal information in question. These safeguards are designed to help protect your personal information against loss, unauthorized access or disclosure, modification, or destruction. While we use reasonable efforts to protect your personal information, we cannot guarantee the security of your personal information. In the event that we are required by law to inform you of any privacy or security event relating to your personal information we may notify you electronically, in writing, or by telephone, if permitted to do so by law.

7. Your Rights in Relation To Your Personal Information

Under applicable state data protection laws, you may have certain rights with respect to your personal information, including the right to:

- Request access to and obtain a copy of the personal information we have about you, including information about;
- Request correction of any inaccurate or incomplete personal information we have about you;
- Request deletion of your personal information, subject to certain limitations and exceptions; and

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- Restrict or object to certain uses or disclosures of your personal information in limited circumstances.

Please note, not all these rights are absolute, and they do not apply in all circumstances. In some cases, we may limit or deny your requests to access, modify, or delete your information, or to object to processing. This may occur because the law permits or requires us to do so. We do not discriminate against individuals who exercise state-conferred rights.

How to Exercise Your Rights

If you want to exercise any of the above rights, please use this [Data Subject Request Form](#), or call us toll-free at 888-577-7688 ext. 2.

In order to process your request, we must be able to verify your identity to make sure you are the person about whom we have collected personal information or an authorized representative. Depending on the type of request, we may conduct the verification process by email or phone using information that matches our records. The information you must provide as part of the verification process may include: your full name, address, email, phone number, and date of birth.

If you are a California resident, you may designate an authorized agent to submit a request on your behalf to access, correct, or delete your personal information. To do so, you must (1) provide that authorized agent written, signed, and notarized permission to submit such request, and (2) verify your own identity directly with us.

If you are submitting a request on behalf of another person, please use this [Data Subject Request Form](#), or call us toll-free at 888-577-7688 ext. 2. You must provide written and notarized proof that you have been authorized by the individual to act on his or her behalf. Please note, we may deny a request from an authorized agent that does not submit proof that they have been authorized to submit such request.

8. Changes to this Privacy Notice

We may update or change this Privacy Notice from time to time. You can see when this Privacy Notice was last updated by referring to the date at the end of this Privacy Notice. To the extent we make material changes, the Privacy Notice that was in place at the time you submitted personal information to us will generally govern that information.

9. Contact Information

If you have any questions about this Privacy Notice or would like additional information, please contact us using our [Website's Contact Us form](#) or at:

Sprouts Farmers Market, Inc. 5455 E. High Street, Suite 111 Phoenix, Arizona 85054

Email: customerrelations@sprouts.com.

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Fax: 480-814-8017

Phone: 480-814-8016 or toll-free at 888-577-7688 ext. 2.

10. Additional Information for California Residents

California law requires us to disclose the following additional information related to our privacy practices. If you are a California resident, this section applies to you in addition to the rest of this Privacy Notice:

- **Categories of Personal Information Collected**

California law requires us to disclose whether certain categories of personal information are collected, “sold,” or disclosed for a “business purpose” (as those terms are defined under California law). The following describes the categories of personal information we collect and to whom we disclose such information for business purposes. We do not “sell” personal information (as such term is defined under California law).

Categories of Personal Information Collected	Categories of Recipients to Whom Information is Disclosed for our Business Purposes
Identifiers , such as real name, alias, postal address, unique personal identifier, online identifier, email address, account name, or other similar identifiers.	<ul style="list-style-type: none">• Subsidiaries• Business partners• Government entities (as may be needed to comply with law or prevent illegal activity)• Internet service providers• Operating systems and platforms• Service providers
Other identifying information , such as physical characteristics or description, date of birth and signature.	<ul style="list-style-type: none">• Subsidiaries• Business partners• Government entities (as may be needed to comply with law or prevent illegal activity)• Service providers
Financial information , such as banking details, tax information, payroll information, and withholdings.	<ul style="list-style-type: none">• Subsidiaries• Business partners• Government entities (as may be needed to comply with law or prevent illegal activity)• Service providers

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<p>Health and safety information, such as health conditions (if relevant to your employment), job restrictions, workplace illness and injury information, and health insurance policy information.</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Government entities (as may be needed to comply with law or prevent illegal activity) • Service providers
<p>Characteristics of protected classifications under California or federal law, such as age, race, color, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status to the extent disclosed by the staff member.</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Government entities (as may be needed to comply with law or prevent illegal activity) • Service providers
<p>Internet or other electronic network activity information, such as your search history, browsing history, login information, and IP addresses on the company's information systems and networks.</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Government entities (as may be needed to comply with law or prevent illegal activity) • Internet service providers • Operating systems and platforms • Service providers
<p>Geolocation data, such as time and physical location related to use of an internet website, application, device, or physical access to a company office location.</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Internet service providers • Service providers
<p>Sensory information, such as audio, electronic, visual, thermal, olfactory, or similar information. This may include call monitoring and video surveillance and in some cases COVID-19 or other public health related temperature checks.</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Government entities (as may be needed to comply with law or prevent illegal activity) • Service providers
<p>Professional or employment-related information, such as work history, academic and professional qualifications, educational records, references, interview notes, job title, position, hire dates, compensation, performance and disciplinary records, and vacation and sick leave records.</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Government entities (as may be needed to comply with law or prevent illegal activity) • Service providers
<p>Inferences drawn from any of the information listed above, such as profile or summary about a staff member's preferences, characteristics, attitudes, intelligence, abilities, and aptitudes.</p>	<ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Service providers

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- **Categories of Sensitive Personal Information Collected**

We also collect a subset of personal information that is deemed “sensitive personal information” under California law. The following describes the categories of sensitive personal information we collect, our purposes for collecting it, and whether we sell or share that information for purposes of cross-context behavioral advertising.

Categories of Sensitive Personal Information Collected	Purposes for which it is collected	Is information sold or shared for purpose of cross-context behavioral advertising?
Social security, driver’s license, state identification card, or passport number.	<ul style="list-style-type: none"> • Comply with all applicable laws and regulations. • Conduct background checks (where permitted by applicable law) • Eligibility for employment • Business travel 	No
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.	<ul style="list-style-type: none"> • Creation, maintenance, and security of your online employee accounts. 	No
Precise geolocation	<ul style="list-style-type: none"> • Manage and monitor employee access to company facilities, equipment, and systems. 	No
Racial or ethnic origin, religious or philosophical beliefs, or union membership.	<ul style="list-style-type: none"> • Comply with all applicable laws and regulations. 	No
Contents of a mail, email, and text messages unless the business is the intended recipient of the communication	<ul style="list-style-type: none"> • Manage and monitor employee access to company facilities, equipment, and systems. • Investigate and enforce compliance with and 	No

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	<p>potential breaches of Company policies and procedures.</p> <ul style="list-style-type: none">• Exercise or defend the legal rights of the Company and its employees and affiliates, customers, contractors, and agents.	
Information concerning health	<ul style="list-style-type: none">• Comply with all applicable laws and regulations.• Employee benefits administration• Workers' compensation claims management	No
Information concerning sex life or sexual orientation	<ul style="list-style-type: none">• Employee benefits administration	No

- **Purposes for Which We Use Personal Information**

We collect the categories of personal information listed above for human resources, employment, benefit administration, health and safety, and business-related purposes and to comply with applicable laws and regulations. For additional details about how we use and disclose personal information, please refer to Section 3 (How We Process Your Personal Information) and Section 4 (How We Share Your Personal Information) of this Privacy Notice.

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