



**MCLANE COMPANY, INC.  
FACILITY ACCESS PRIVACY NOTICE**

**Effective Date: October 18, 2024**

**1. What is this document and why should you read it?**

McLane Company, Inc. and its subsidiaries (collectively, “McLane”, “we”, “us”, or “our”) hold and process a wide range of information, some of which relates to you as a visitor to a McLane facility (including a distribution center, office or other site). This Privacy Notice describes how we collect and process personal information about you. It also sets out details of how to contact us if you have any questions regarding the personal information collected about you.

In this context, **personal information** generally means information from which you are identifiable or can be identified (e.g. your name, address, contact information, etc.), or other information about you that can be linked to you. In addition, **processing** means any activity relating to personal information, including, by way of example, collection, storage, use, consultation, disclosure, sharing and transmission.

In summary, we collect personal information about you in order to grant you access to our facility; to better ensure your safety, the safety of others, and the security of our resources during your visit; and to grant you access to our internal IT systems, as appropriate.

**2. What types of personal information do we collect and where do we get it from?**

In summary, we collect information like your name, company affiliation, purpose for your visit, the time and date of your visit, vehicle information, and the number on your government-issued ID (whether it is your driver’s license, passport, or other identification card). Your presence in our facility may be recorded via our CCTV cameras. We may also collect what California privacy law refers to as “sensitive personal information,” such as your health information (e.g., your temperature and responses to questions) to ascertain whether you may have been exposed to a virus (including, but not limited to, COVID-19). Please note that if you use your computer or mobile device to access McLane Wi-Fi available at our facilities (such as Wi-Fi for guests), you may be marking/reporting its geolocation data, including, potentially, its precise geolocation data. This is inherent to the operation of Wi-Fi systems. However, McLane does not collect or store such geolocation data.

If you represent yourself as law enforcement, or as a representative of a governmental or regulatory agency, we may ask that you show a copy of your credentials. However, we generally will not make a copy of your credentials unless we are legally required to do so or if there is concern as to the authenticity of your credentials.

McLane collects your personal data directly from you, or from an individual acting on your behalf, in advance of your accessing a McLane facility to protect our facility, workers, and corporate resources, as well as to protect you (for example, should there be an event that requires personnel accountability or evacuations).

The personal information about you that we collect includes information within the below categories of data. These categories also represent the categories of personal information that we have collected over the past 12 months. Note that the categories listed below are defined by California state law. Inclusion of a category in the list below indicates only that we may collect some information within that category. It does not necessarily mean that we collect all information listed in a particular category.

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Category	Source	Purpose of Processing
<p><b>Personal identifiers.</b> Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.</p>	<p>This information is collected directly from you or from your representative.</p>	<p>This information is processed in order to maintain security and accountability, and to comply with local laws, including those relating to health and safety.</p>
<p><b>Usage information.</b> Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with an Internet Web site, application, or advertisement. McLane reserves the right to monitor internet or other similar network activity to the extent you use McLane's information systems or McLane-owned electronic communication devices, or to the extent you use your personally-owned electronic communication devices to access McLane's information systems. This extends to personal (non-McLane owned) email boxes accessed through McLane-owned or operated information systems or electronic communication devices.</p>	<p>This information is collected directly from you if you utilize our information systems while visiting our facility, typically through the use of cookies and similar technologies.</p>	<p>This information is processed in order to administer your relationship with us, including meeting our legal and compliance obligations and pursuing the efficient management of our business.</p> <p>It is also processed in order to help detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, and for compliance management.</p>
<p><b>Recordings.</b> Audio, electronic, visual, thermal, olfactory, or similar information.</p>	<p>Visual information is collected via our CCTV cameras.</p>	<p>This visual data is processed in order to maintain security and accountability, and to comply with local laws, including those relating to health and safety.</p>
<p><b>Professional or employment-related information,</b> such as your employer and job title.</p>	<p>This information is collected directly from you or from your representative.</p>	<p>This data is processed in order to maintain security and accountability.</p>

### 3. Sensitive Personal Information

We do not use or disclose sensitive personal information we collect for purposes other than those generally permitted under California law. We may collect the following sensitive personal information.

Category	Source	Purpose of Processing
<b>Health information.</b>	This information is collected directly from you or our service providers.	This information is used to administer your relationship with us and manage the safety of our workforce, including to ascertain whether you may have been exposed to a virus in connection with a pandemic.

### 4. Who do we share personal information about with, and why?

The broad classes of third parties to which we may transfer personal information about you in the above categories include:

- **Third Party Service Providers.** We disclose your information, including your personal information, to third-party service providers for purposes of administering your relationship with us, including meeting our legal obligations, as applicable. We also disclose your personal information to third-party service providers to pursue the efficient management of our business, as well as to help detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity; and for compliance management.
- **Sharing For Protection of Us, You, and Others.** We may share personal information with our tax advisors, legal advisors, and auditors, as well as when required or appropriate to: comply with law enforcement requests and legal process, such as a court order or subpoena; respond to your requests; or protect your, our, or others' rights, property, or safety.
- **Merger or Sale.** If all or a portion of McLane, the site, or McLane's assets are sold or transferred, personal information and other information collected about you may be treated as an asset and transferred in accordance with this Privacy Notice.
- **Your Permission.** We may also otherwise disclose your personal information with your permission.

We do not and do not intend to "sell" personal information about you or "share" it for cross-context behavioral advertising, as defined under applicable privacy law. We also have not done so for the last 12 months. In addition, we do not share your personal information with third parties to use for their own marketing or promotional purposes.

We will endeavor to ensure that all non-governmental third parties to which we transfer personal information about you agree, as part of their contract with us, to treat personal information about you in accordance with applicable privacy laws.

## **5. Where do we keep personal information about you and for how long do we keep it?**

We store personal information about you in physical files or on computer systems operated by or under the instruction of McLane, and/or in hard copy form at our premises or at off-site storage locations leased to McLane. We will maintain personal information about you for as long as necessary in connection with both our and your legal rights and obligations, and in accordance with our Records Retention Schedule, both during and following the period of your relationship with us. We will delete personal information about you in accordance with our Records Retention Schedule.

## **6. How do we keep personal information about you secure?**

We have reasonable measures in place to prevent personal information from being accidentally lost, used, or accessed in an unauthorized way. We limit access to personal information to those who have a business need for such access. Those individuals who process personal information on our behalf may do so only in an authorized manner. They are also subject to a duty of confidentiality. We have policies in place that regulate how employees within McLane must handle information, including personal information. We limit access to our premises and to our computer networks, and we take reasonable steps to safeguard against unauthorized access to such premises and networks. We have procedures in place to manage any suspected information security breach and will notify you and any applicable regulator of an information security breach consistent with legal requirements.

## **7. What are your rights in relation to personal information about you and how can you exercise them?**

Depending on where you live, your current jurisdiction and applicable privacy laws, and subject to any relevant restrictions/exemption, you may be entitled to all or some of the rights described below regarding your personal information, subject to certain conditions and limitations. Only those rights relevant in your jurisdiction will apply, and our inclusion of information about privacy laws does not imply that all privacy laws are applicable. We may, however, choose to offer these rights, even if we are not required to under applicable privacy law.

- **Right to Know** – You may be entitled to request that we disclose to you personal information we have collected about you, the categories of sources from which we collected the information, the purposes of collecting the information, the categories of third parties with whom we have shared the information, the categories of personal information that we have shared with third parties for a business purpose, the categories of information sold, and the categories of third parties information is sold to. In some instances, you may have the right to receive the information about you in a portable and readily usable format. Before providing any of this information, we must be able to verify your identity.
- **Right to Opt-Out** – You may have the right to opt-out of information sharing that constitutes “selling” or “sharing” personal information under California law.
- **Right to Limit** – You may have the right to direct us to limit our use of your sensitive personal information to certain purposes.
- **Right to Deletion** – Subject to certain conditions, you may be entitled to request that we delete personal information about you. Before deleting personal information, we must be able to verify your identity. We will not delete personal information about you when the information is required to fulfill a legal obligation, is necessary to exercise or defend legal claims, or where we are required or permitted to retain the information by law. For example, we cannot delete certain personal information about you while continuing to provide you with certain products and services or where we are legally required to retain certain information.

- Right to Correction – You may be entitled to request that we correct inaccurate personal information. Before collecting personal information, we must be able to verify your identity. We will not correct personal information about you when the information is required to fulfill a legal obligation, is necessary to exercise or defend legal claims, or where we are required or permitted to retain the information as-is by law.

Data solely retained for data backup purposes is principally excluded from these rights until it is restored to an active system or next accessed or used for a sale, disclosure, or commercial purpose.

If you chose to exercise any of these rights, to the extent that they apply, privacy law prohibits us from discriminating against you on the basis of choosing to exercise your privacy rights.

Please note that under applicable privacy law, and for the protection of your personal information, we may be limited in what personal information we can disclose.

Before providing information, you request in accordance with these rights, we must be able to verify your identity. In order to verify your identity, you will need to submit information about yourself, including your name, contact information, and, to the extent applicable, providing your account login credentials. We will match this information against information we have previously collected about you or provided to you to verify your identity and your request. If we are unable to verify your identity as part of your request, we will not be able to satisfy your request. We are not obligated to collect additional information in order to enable you to verify your identity. For deletion requests, you will be required to submit a verifiable request for deletion and then confirm separately that you want personal information about you deleted.

If you would like to appoint an authorized agent to make a request on your behalf, you must provide the agent with written, signed permission to submit privacy right requests on your behalf. Alternatively, your authorized agent may provide evidence of having power of attorney or acting as a conservator for you. Note that we may require you to verify your identity with us directly before we provide any requested information to your authorized agent unless your authorized agent has power of attorney or acts as a conservator, in which case we will not contact you directly.

Information collected for purposes of verifying your request will only be used for verification.

You can submit requests to exercise these rights by calling us at 1-833-614-0968 to speak to a member of our team, sending an email to [privacyrequests@mclaneco.com](mailto:privacyrequests@mclaneco.com), or clicking the link on McLaneco.com titled "Personal Information Request," which will allow you to access a web form for submitting requests.

## **8. Changes to this Privacy Notice**

We may change this Notice at any time. The Notice, and any updates to the Notice, will be posted at [www.mclaneco.com/facilityaccess](http://www.mclaneco.com/facilityaccess). The date the Notice was last revised will appear at the top of the page.

## **9. Where can you find out more?**

You may call 1-833-614-0968 or send an email to [privacyrequests@mclaneco.com](mailto:privacyrequests@mclaneco.com) if you have any questions, concerns, complaints, or suggestions regarding our Privacy Notice or otherwise need to contact us..