

## Einstein Noah Restaurant Group

### California Applicant Privacy Policy

Last Revised: December 16, 2025

The California Consumer Privacy Act, as amended by the California Privacy Rights Act, and its implementing regulations (collectively, the “CCPA”), gives California residents certain rights and requires businesses to make certain disclosures regarding their collection, use, and disclosure of Personal Information. This California Applicant Privacy Policy (“Applicant Policy”) describes Einstein Noah Restaurant Group, Inc., Bruegger’s Enterprises, Inc., Noah’s New York Bagels Company, Inc., and Manhattan Bagel Company, Inc. (together “Bagel Brands” “We,” “Us,” and “Our”) practices regarding the collection, use, and disclosure of Personal Information of applicants and candidates for employment with Bagel Brands (“Applicants,” “you,” “your”) that are residents of California.

Please note, this Applicant Policy only applies to California residents that are applying for employment with Bagel Brands. It does not apply to individuals who are residents of other U.S. states and/or individuals who are not applying for employment with Us. For further details about Our privacy practices pertaining to non-Applicant Personal Information, please visit our [Website and Mobile App Privacy Policy](#). Please also note that this Applicant Policy does not apply to information We collect about Bagel Brands employees or independent contractors.

If you are unable to review or access this Applicant Policy due to a disability, you may contact Us at [peopleservices@bagelbrands.com](mailto:peopleservices@bagelbrands.com) or [einsteinbros.com/contact](http://einsteinbros.com/contact) to access this Applicant Policy in an alternative format.

#### Definitions Specific to this 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 a particular Applicant or household. Personal Information also includes “Sensitive Personal Information,” as defined below.
- “Sell,” “Sale,” or “Sold” means renting, releasing, or transferring an Applicant’s Personal Information to a Third Party for money or other valuable consideration.
- “Sensitive Personal Information” means (a) Personal Information that reveals an Applicant’s: (1) Social security, driver’s license, state identification card, or passport number; (2) Account log-in, financial account number, debit card number, or credit card number in combination with any required security or access code, password, or credentials allowing access to the Applicant’s account; (3) Precise geolocation; (4) Racial or ethnic origin; (5) Religious beliefs; (6) Union membership; or (7) Contents of email or text messages, unless We are the intended recipient; (8) Genetic data; or (9) Neural data; (b) Biometric information used to uniquely identify the Applicant; and (c) Personal Information concerning an Applicant’s health, sex life, or sexual orientation.
- “Share,” “Shared,” or “Sharing” means transferring an Applicant’s Personal Information to a Third Party for cross-context behavioral advertising purposes, whether or not for money or other valuable consideration.
- “Third Party” means a person or organization which is not an Applicant, Vendor, or an entity owned or controlled by Us and as defined by the CCPA.

- “Vendor” means a “service provider,” or “contractor,” which collects, stores, or otherwise handles data for Us, as those terms are defined in the CCPA.

Other terms used in this Applicant Policy that are defined under the CCPA shall have the meanings afforded to them under the CCPA.

#### Applicant Personal Information We Collect and Disclose

The chart below shows the categories of Applicant Personal Information we may collect and have collected in the past 12 months; examples of Personal Information in each category; types of sources from which each category of Personal Information is collected; the business purposes for which each category of Personal Information is collected and processed; and the types of Vendors or Third parties with whom that category of Personal Information is disclosed, Sold, or Shared and has been disclosed, Sold, or Shared in the past 12 months. As this chart shows, we may Share or Sell Applicant Personal Information to Third Parties or disclose certain Personal Information to Vendors for business purposes.

Category of Personal Information	Examples	Sources from Which This Personal Information is Collected	Business or Commercial Purposes for Collection, Use, Disclosure, and Sale/Share	Types of Vendors or Third Parties with Whom This Personal Information is Disclosed, Sold, or Shared
Unique Identifiers	Real name, signature, alias, address, unique personal identifier, online identifier, IP address, email address, account name, social security number, driver's license number, passport number, physical characteristics or description, emergency contact information	<ul style="list-style-type: none"> <li>-Directly from you on an employment application</li> <li>-Direct communication with you</li> <li>-From your device when you visit our website</li> <li>-From recruitment agencies</li> </ul>	<ul style="list-style-type: none"> <li>-Evaluate a potential employee relationship with you</li> <li>-Assess your fitness and physical capacity for work</li> <li>-Contact you regarding your application and potential employee relationship with us</li> <li>-For background check or document verification</li> <li>-Personalize Applicant experience</li> </ul>	<u>Disclosed:</u> <ul style="list-style-type: none"> <li>-Vendors</li> <li>-Business partners</li> </ul> <u>Shared or Sold:</u> <ul style="list-style-type: none"> <li>-Business partners</li> <li>-Marketing providers</li> <li>-Analytics providers</li> <li>-Social media</li> </ul>

			<ul style="list-style-type: none"> <li>- Market and advertise to potential Applicants</li> <li>-Analytics purposes</li> </ul>	
<b>Contact and Financial Information</b>	Name, address, telephone, email, banking and financial information	-Directly from you	<ul style="list-style-type: none"> <li>-Contact you regarding your application and potential employee relationship with us</li> </ul>	<u>Disclosed:</u> - Vendors <u>Shared or Sold:</u> - None
<b>Characteristics of Protected Classifications</b>	Age, gender, race, physical or mental health conditions, marital status	-Directly from you on an employment application – Diversity, Equity and Inclusion programming	<ul style="list-style-type: none"> <li>-Comply with legal requirements</li> <li>– Ensure eligibility for employment</li> <li>– Accommodate special needs (e.g. disability)</li> </ul>	<u>Disclosed:</u> - Vendors - Government, regulatory, and legal authorities <u>Shared or Sold:</u> - None
<b>Internet or Other Electronic Activity</b>	Browsing history, search history, and information regarding an Applicant's interaction with an internet website application, or advertisement	-From your device when you visit our website	<ul style="list-style-type: none"> <li>-Network security</li> <li>- Personalize Applicant experience</li> <li>- Market and advertise to potential Applicants</li> <li>-Analytics purposes</li> </ul>	<u>Disclosed:</u> - Vendors <u>Shared or Sold:</u> - Business partners - Marketing providers - Analytics providers - Social media
<b>Geolocation Data</b>	Device location	<ul style="list-style-type: none"> <li>- From your device when you visit our website</li> <li>-Direct communication with you</li> </ul>	<ul style="list-style-type: none"> <li>-Evaluate a potential employee relationship with you</li> <li>- Personalize Applicant experience</li> <li>- Market and advertise to</li> </ul>	<u>Disclosed:</u> - Vendors <u>Shared or Sold:</u> - Business partners - Marketing providers - Analytics providers - Social media

			potential Applicants -Analytics purposes	
Audio, Electronic, Visual, Thermal, Olfactory, Or Similar Information	Call and video recordings	-From you when you call Us or visit Our locations	-Security of company -Communicate with you regarding your application and potential employee relationship with us	<u>Disclosed:</u> -Vendors <u>Shared or Sold:</u> -None
Professional or Employment- Related Information	Work history, prior employer	-Directly from you on an employment application -Direct communication with you -From recruitment agencies	-Evaluate a potential employee relationship with you -Perform background checks and verify past employment, professional standing, and other qualifications	<u>Disclosed:</u> -Vendors <u>Shared or Sold:</u> -Business partners -Marketing providers -Analytics providers -Social media
Education Information	Student records, directory information	-Directly from you on an employment application -Direct communication with you -From recruitment agencies	-Evaluate a potential employee relationship with you -Perform background checks and verify educational history, professional standing, and other qualifications	<u>Disclosed:</u> -Vendors

<b>Inferences Drawn from Other Categories to Create a Profile</b>	Profile reflecting preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	<ul style="list-style-type: none"> <li>-Directly from you</li> <li>-Direct communication with you</li> <li>-From your managers or coworkers</li> </ul>	<ul style="list-style-type: none"> <li>-Identify employment strengths</li> <li>- Personalize Applicant experience</li> <li>- Market and advertise to potential Applicants</li> <li>-Analytics purposes</li> </ul>	<u>Disclosed:</u> - Vendors <u>Shared or Sold:</u> - Business partners - Marketing providers - Analytics providers - Social media
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#### Sensitive Personal Information We Collect and Disclose

Category of Sensitive Personal Information	Sources From Which This Sensitive Personal Information is Collected	Business Purposes for Collection and Disclosure	Types of Vendors or Third Parties with Whom This Sensitive Personal Information is Disclosed
<b>Social security, driver's license, state identification card, or passport number</b>	<ul style="list-style-type: none"> <li>-Directly from you on an employment application</li> <li>-Direct communication with you</li> </ul>	<ul style="list-style-type: none"> <li>Evaluate a potential employee relationship with you;</li> <li>-Perform background checks</li> </ul>	<u>Disclosed:</u> - Vendors <u>Shared or Sold:</u> - None
<b>Racial or Ethnic Origin, Religious or Philosophical Beliefs, or Union Membership</b>	<ul style="list-style-type: none"> <li>-Directly from you on an employment application</li> </ul>	<ul style="list-style-type: none"> <li>-Comply with legal requirements</li> <li>- Accommodate special needs (e.g. religious dietary restrictions)</li> <li>- Diversity, Equity and Inclusion programming</li> </ul>	<u>Disclosed:</u> - Government, regulatory, and legal authorities <u>Shared or Sold:</u> - None
<b>Information on Sex Life or Sexual Orientation</b>	<ul style="list-style-type: none"> <li>-Directly from you on an employment application if you elect to provide it</li> </ul>	<ul style="list-style-type: none"> <li>- Diversity, Equity and Inclusion programming</li> </ul>	<u>Disclosed:</u> - None <u>Shared or Sold:</u> - None

In addition to the business purposes listed in the chart above, We may also use each category of Personal Information We collect to:

- Comply with laws and regulations, including (without limitation) applicable tax, health and safety, anti-discrimination, immigration, labor and employment, and social welfare laws;
- Monitor, investigate, and enforce compliance with and potential breaches of Bagel Brands policies and procedures and legal and regulatory requirements;
- Comply with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, or summons; and
- Exercise or defend the legal rights of Bagel Brands and its employees, affiliates, customers, contractors, and agents.

We may also de-identify any Personal Information, including any Sensitive Personal Information, We collect about Applicants. When We do so, We take reasonable measures to ensure that the information cannot be associated with an individual or household, and We maintain and use the information in de-identified form. We will not attempt to re-identify the information, except that We may attempt to re-identify the information solely for the purpose of determining whether Our de-identification processes satisfy applicable legal requirements. After it has been de-identified, the information is no longer Personal Information and is not subject to this Applicant Policy.

Further, We collect, process, and disclose the categories of Sensitive Personal Information described in this Applicant Policy only for purposes that are permitted by the CCPA regulations.

In addition to the categories of Third Parties in the chart above, We may also disclose all of the above listed categories of Personal Information:

- To government, regulatory, and legal authorities when we, in good faith, believe disclosure is appropriate to comply with the law, a court order, or a subpoena. We may also disclose Personal Information to prevent or investigate a possible crime, such as fraud or identity theft; to protect the security of Our services; to enforce or apply Our other agreements; or to protect Our own rights or property or the rights, property, or safety of Our users or others.
- To a successor organization or prospective purchaser, if We transfer the ownership or operation of all or a portion of Our business to another organization, We merge with or are acquired by another organization, or if We liquidate Our assets. If such a transfer occurs, We will seek assurances that the successor organization will treat the Personal Information We disclose to it in accordance with this Applicant Policy.
- In aggregated or de-identified form, for Our business purposes or any other purposes permitted by applicable law.

### **Sale & Sharing of Applicant Personal Information**

We Sell and Share, and in the past 12 months have sold and shared, Personal Information about Applicants as described in the chart above. We also Sell and Share, and We have Sold or Shared in the past 12 months, Personal Information in other contexts, such as if you interact with Us outside of the applicant context. This includes Personal Information collected via cookies and other tracking technologies, such as IP addresses and browsing data, including when We allow third parties, such as advertising networks and data analytics providers, to place certain types of cookies or other tracking technologies on Our websites

for marketing and analytics purposes. For more information about Our Sales and Shares of Personal Information of individuals who interact with Us in a consumer context, please see Our U.S. Supplemental Privacy Policy at [here](#)

California residents have the right to opt out of Sale and Sharing. To opt out of the Sale or Sharing of your Personal Information collected via cookies and other online tracking technologies, click [here](#) or select the “Your Privacy Choices” link in the footer of our websites to open Our Cookie Preference Center and then click “Reject All.” To request that We do not Sell or Share other types of Personal Information We may collect about you, click [here](#) or call Us at 1-800-962-6786, option 3. The link will take you to an interactive webform that you can complete and submit to make a request to opt out; if you use the telephone number, you will be guided through a process that will allow you to submit a request.

We do not knowingly Sell or Share Personal Information of consumers under the age of 16.

#### **Retention of Data**

We intend to retain each category of Personal Information described above only for as long as necessary to fulfill the purpose for which it was collected, or a related and compatible purpose consistent with the average Applicant’s expectation, and to comply with applicable laws and regulations. We consider the following criteria when determining how long to retain Personal Information: why We collected the Personal Information; the nature of the Personal Information; the sensitivity of the Personal Information; Our legal obligations related to the Personal Information, and risks associated with retaining the Personal Information.

#### **Your Rights to Your Personal Information**

California Applicants have the following rights regarding Our collection and use of their Personal Information, subject to certain exceptions.

**Right to Know.** You have the right to request certain information We have collected about you. You have the right to request:

- Specific pieces of Personal Information We have collected about you;
- The categories of Personal Information We have collected about you;
- The categories of sources from which Personal Information was collected;
- The business or commercial purposes for which Personal Information was collected, Shared, Sold, or processed;
- The categories of Personal Information We Shared, Sold or disclosed; and
- The categories of Vendors or Third Parties with whom We Shared, Sold or disclosed Personal Information and the purposes for such disclosure.

**Right to Delete.** You have the right to request that We delete certain Personal Information that We have collected from you.

**Right to Correct.** You have a right to request that We correct any inaccurate Personal Information We may maintain about you.

**Right to Opt-Out of the Sale and Sharing of Your Personal Information.** You have the right to opt-out of the Sale and Sharing of your Personal Information with Third Parties.

**Right to Limit the Use of Your Sensitive Personal Information.** You have the right to instruct Us to limit the use and disclosure of your Sensitive Personal Information to only that which is necessary to perform the services or provide the goods reasonably expected by an average Applicant or for specific business purposes defined by applicable law. However, We do not use Sensitive Personal Information of Applicants for purposes beyond those authorized by the CCPA.

**Right to Non-discrimination.** You have a right to exercise the above rights and We will not discriminate against you for exercising these rights. Please note that a legitimate denial of a request to know, delete, or opt-out is not discriminatory, nor is charging a fee for excessive or repetitive requests, as permitted by the CCPA.

#### **Instructions to Exercise your Rights.**

- If you would like to request that We do not Sell or Share Personal Information collected via cookies or other online tracking technologies, click [here](#) or select the “Your Privacy Choices” link in the footer of our websites to open Our Cookie Preference Center and then click “Reject All.” To request that We do not Sell or Share other types of Personal Information We may collect about you, click [here](#), or call Us at 1-800-962-6786, option 3. The link will take you to an interactive webform that you can complete and submit to make a request to opt out; if you use the telephone number, you will be guided through a process that will allow you to submit a request.
- If you would like to make any of the other data requests listed above, please contact Us [here](#) or call Us at 1-800-962-6786, option 3. The link will take you to an interactive webform that you can complete and submit to make a request to exercise your rights. If you use the telephone number, you will be guided through a process that will allow you to submit a verifiable request. For requests to exercise your right to know, correct, and delete, We will also verify your identity before processing your request, using the process set out in the “Verification Process” section below.

You may also designate an authorized agent to exercise your rights under the CCPA on your behalf, and your authorized agent may do so by the same means listed above.

#### **Verification Process**

When you submit a request to exercise your Data Subject Rights to know, correct, or delete, We may ask you to provide information that will enable Us to verify your identity.

If you designate an authorized agent to exercise your rights on your behalf, We may require that you or the authorized agent do the following:

- *Verify your identity with Us directly.*
- *Provide proof of your signed written permission for the authorized agent to submit a request on your behalf.*

We may deny a request from an authorized agent on your behalf if the authorized agent does not submit proof that he, she, or it has been authorized by you to act on your behalf if We request such proof.

#### **Opt Out Preference Signals**

We recognize opt-out preference signals that we are required to recognize for compliance with applicable law. Where required by the CCPA, we treat such opt-out preference signals as a valid request to opt-out of Sale and Sharing for the browser or device through which the signal is sent and any consumer profile we

have associated with that browser or device, including pseudonymous profiles. Further, if we know the identity of the consumer from the opt-out preference signal, we will also treat the opt-out preference signal as a valid request to opt out of Sale and Sharing for such consumer. Consumers may use opt-out preference signals by downloading or otherwise activating them for use on supported browsers and setting them to send opt-out preference signals to websites they visit. However, our sites do not respond to “Do Not Track” signals sent by browsers, which are different from the opt-out preference signals described above.

#### **Additional Disclosures**

- **Financial Incentives for California Consumers.** We generally do not offer financial incentives to California Applicants under the CCPA. If and when we do so, we will update this Applicant Policy. We do, however, offer loyalty/rewards programs that an Applicant may participate in in their capacity as a consumer, rather than as an Applicant. For more information, please see Our Notice of Financial Incentives for Consumers [here](#).

#### **Changes to Our Applicant Policy**

Bagel Brands reserves the right to amend this Applicant Policy at Our discretion and at any time. When We make changes to this Applicant Policy, We will post an updated policy on Our website with the new revised date. If required by applicable law, We will provide you with additional notice if We make a material change to the Applicant Policy, for example, by sending you an email.

#### **Additional Information**

If you would like additional information regarding Our Applicant Policy, please contact Us at [peopleservices@bagelbrands.com](mailto:peopleservices@bagelbrands.com) or [einsteinbros.com/contact/](http://einsteinbros.com/contact/) or

Einstein Noah Restaurant Group, Inc.  
1720 S. Bellaire St.  
Attn: Skybox  
Denver, CO 80222