

Effective Date: March 6, 2025

Associate Data Privacy Notice

1. Purpose

- 1.1 This Data Privacy Notice (“Notice”) aims to give associates of Americold Logistics LLC and its subsidiaries (“Americold”), information on how their personal data (i.e. information that identifies an associate) (“Personal Information”) is collected and processed by Americold.
- 1.2 Where local Data Protection requirements in the country where you are located impose conflicting or stricter standards, or afford greater rights, than those described in this Notice, Americold will process your Personal Information in accordance with local data protection requirements in the country where you are located.
- 1.3 This Notice does not form part of your contract of employment or other contract to provide services. This Notice may be amended and replaced from time to time. If Americold makes a material change to this Notice, we will use reasonable efforts to notify you either by prominently posting an alert of such changes before they take effect or by directly sending you a communication regarding such changes. We encourage you to periodically review this Notice to learn how Americold is processing your Personal Information.
- 1.4 It is important that you read and understand this Notice. If you have questions or do not understand it fully, please ask your local Human Resources Department.

2. Processing of Associate Personal Information

- 2.1 Americold is considered a “data controller” with respect to your Personal Information, which means that we determine the purpose for which your Personal Information is processed and the means by which such processing occurs. That being said, Americold will always process your Personal Information in accordance with applicable privacy and data protection laws and regulations, and any consultation requirements with worker representation, where applicable (“Data Protection Requirements”).
- 2.2 The provision of your Personal Information is necessary in order for Americold to fulfill its legal and contractual obligations and where in the legitimate interests of Americold for the performance of your employment or service relationship and for the purposes as set out below. As such, your failure to provide Personal Information in whole or in part, could make it impossible for Americold to fulfill some or all of its obligations regarding your employment or service relationship, including those related to, for example, payroll, social security contribution, tax and insurance.

3. Types of Associate Personal Information

- 3.1 Americold may process the following types of Personal Information for the purposes set out in this Notice and subject to any local Data Protection Requirements:
 - a) your identification data (e.g., name, photograph, social security number or national identity number, biometric data, contact details, including phone number and private email address);
 - b) your date and place of birth and nationality;
 - c) marital status;

- d) financial information (e.g. bank account information, tax information, etc.)
- e) emergency contact information and contact's relationship to you;
- f) compensation, bonus or incentive information and social security premiums (including amounts paid, the frequency and currency of payments);
- g) benefits information (e.g. car allowance, health insurance, retirement plans, pension contributions) (including amounts paid, the frequency and currency of payments), including information about dependents and beneficiaries only as needed or required;
- h) records of your work and education history (including internal and external work history and references);
- i) records of your performance (including evaluations and ratings, grievances and disciplinary records);
- j) information relating to attendance, vacation, absence and sick/leave from work;
- k) general organizational data (such as your department, work location, job title and seniority);
- l) IT data (e.g. passwords, access rights and usage data);
- m) the content of your telephone calls where recorded (training, WebEx or Teams meetings, etc.); and
- n) other information voluntarily disclosed by you.

3.2 Sensitive personal data (i.e., personal data revealing racial or ethnic origin, parental status, biometric data, data concerning health (in relation to an associate's job), military status, or data concerning a person's sexual orientation) is only processed in accordance with applicable Data Protection Requirements and where the processing is necessary so Americold can comply with employment law, with your explicit consent or where such processing is specifically authorized or required by local law.

3.3 To ensure suitability for specific roles within the company, as required by relevant regulatory authorities or where in the public interest, Americold may conduct background checks on relevant associates in compliance with local legislation. Where Americold carries out background checks on associates this may involve the processing of data relating to criminal convictions and offences. This data will only be processed where such processing is specifically required and authorized by law.

4. Purposes of the Processing of Associate Personal Information

4.1 Your Personal Information may be processed by Americold for the purposes set out below subject to any local Data Protection Requirements:

- a) managing recruitment of associates;
- b) administering human resource functions including performance reviews and appraisals, time and attendance tracking, vacation and sickness leave, training, certifications and licensure, internal directories and organizational charts, internal communications, professional elections, social and

- cultural activities directly implemented by Americold and dealing with disciplinary action, termination and retirement of associates;
- c) administering payroll, the payment of expenses, remuneration and other benefits of associates such as bonuses, stock/shares, car allowances, loans, retirement plans, pensions, health insurance, life insurance travel insurance, and disability plans;
 - d) managing associate communications including authorizing, granting and administering access to or use of Americold systems, facilities, devices and records including management of email accounts;
 - e) carrying out audits and to investigate and resolve complaints, grievances or misconduct;
 - f) preparing for and acting in relation to enquiries, investigations or proceedings, by governmental, administrative, judicial or regulatory authorities, including civil litigation;
 - g) monitoring associates where done in accordance with Americold policies and procedures (including without limitation the Americold Information Technology policies for associates) and applicable local laws including where to establish to existence of facts, to check that the business is complying with regulatory or self-regulatory procedures, to investigate and detect unauthorized use of the system, and to prevent or detect crime; and
 - h) any other legitimate purposes relating to the above.

5. Disclosure of Associate Personal Information and Recipients

5.1 Your Personal Information may be disclosed to the extent necessary for the above purposes to the following recipients, subject to any local Data Protection Requirements:

- a) affiliates of Americold;
- b) financial institutions, retirement or pension plan institutions, insurance companies, consultant and professional advisors;
- c) other service providers such as, payroll administrators, benefits providers and administrators and information technology systems providers (duly appointed as data processors) and involved in the provision of services to Americold and/or its associates;
- d) independent public accountants and auditors, authorized representatives of internal control functions such as, audit, legal and/or corporate security;
- e) local tax authorities and any governmental or administrative body where Americold determines that it is necessary or desirable in order to comply with applicable laws, court orders, or government regulations; and
- f) any third party that is looking to acquire or does acquire all or part of the assets or stock of Americold, or that succeeds Americold in carrying on all or a part of the business of Americold or services provided to or by it whether by merger, acquisition, re-organization, outsourcing, insourcing or otherwise.

6. Associates Working in Europe and Transfer of Associate Personal Information

- 6.1 Given the global nature of Americold's footprint and activities, and in order to effectuate the uses described in Section 2.4, Americold may transfer your Personal Information to other Americold entities or to other recipients as referred to in Section 4, that are located in countries outside the country where you are located. If you are an associate working in Europe, be advised that the United States has data protection and privacy regulations that may not offer the same level of protection as in Europe. To address these concerns, Americold has executed Standard Contractual Clauses for controller to controller transfers as approved by the European Commission for those transfers between Americold corporate entities. These clauses permit us to transfer your Personal Information from Europe to third countries, including the United States. Where Americold transfers your Personal Information to other recipients outside of Europe, we will enter into the appropriate Standard Contractual Clauses with the recipient or seek assurances that sufficient processes and controls are in place to ensure data is properly secured and protected.

If you would like to receive a copy of our Standard Contractual Clauses, you can contact privacy@americold.com.

If you are an Associate working in Europe, you have rights that may include:

- *Right of Access:* You have the right to ask Americold for copies of your associate Personal Information. This right always applies although there are some exemptions, which means you may not always receive all the associate Personal Information we process.
- *Right to Rectification:* You have the right to ask us to rectify associate Personal information you think is inaccurate. You also have the right to ask us to complete associate Personal Information you think is incomplete.
- *Right to Restrict Processing:* You have the right to ask the Company to restrict the processing of your associate Personal Information in certain circumstances.
- *Right to Withdraw Consent:* You have the right to revoke your consent to our processing of your associate Personal Information at any time. Withdrawing consent will not affect the lawfulness of the processing performed based on your consent before its withdrawal.
- *Right to Erasure:* You have the right to ask us to erase your associate Personal Information in certain circumstances.
- *Right to Data Portability:* This only applies to associate Personal Information you have given to us and that is held electronically. You have the right to ask that we transfer this information from Americold to another organization or give it to you.
- *Right to Lodge a Complaint:* You may contact the relevant data protection authority to lodge a complaint related to our handling of your associate Personal Information. However, we invite you to give us a chance to resolve the situation directly with you. Your privacy is important to us, and we will do our best to address any concerns.

If you wish to make a request with respect to exercising your rights above, please contact your Human Resources Department or privacy@americold.com.

7. Local Data Protection Requirements

- 7.1 Where local Data Protection requirements in the country where you are located impose conflicting or stricter standards, or afford greater rights, than those described in this Policy, Americold will process your Personal Information in accordance with local data protection requirements in the country where you are located.

8. Retention and Securing Associate Personal Information

- 8.1 Your Personal Information is retained for the periods as set out in Americold's Record Management Policy, a copy of which may be obtained by accessing the Policies and Procedures SharePoint site or by contacting your local Human Resource Department.
- 8.2 Americold may hold your Personal Information electronically and/or in hard copy form. Access to your Personal Information is restricted to authorized associates of Americold only. Authorized associates of Americold require access to your Personal Information to allow them to perform their duties of employment.
- 8.3 Americold will implement appropriate technical and organizational measures to protect your Personal Information against loss or theft, as well as from accidental or unlawful destruction or alteration, unauthorized access, or disclosure and against all other unlawful forms of processing, regardless of the format in which it is held.
- 8.4 Americold will use appropriate security safeguards to provide necessary protection such as:
- a) physical measures (locked filing cabinets, restricted access to offices, alarm systems);
 - b) technological tools (passwords, encryption or firewalls); and
 - c) organizational controls (security clearances, limiting access on a "need-to-know" basis, staff training and confidentiality agreements).

9. Data Breaches

- 9.1 Americold has processes and procedures in place to respond to cyber incidents of any scale. Our *Cyber Incident Response Policy* outlines the investigation, reporting and mitigating protocols in the event a data breach occurred. Refer to this policy for further details.

10. Inquiries, Requests or Concerns

- 9.1 All inquiries, requests or concerns regarding this Notice or relating to the processing of your Personal Information including all requests as detailed in Section 6 above, should be sent to your local Human Resource Department or privacy@americold.com.
- 9.2 You can also contact the Americold Ethics Helpline at <http://americoldethicshelpline.com> if you have a question or wish to report a concern. The Helpline is maintained by an independent third-party provider. It is available online or by phone to all our associates and business partners worldwide. Helpline reports can be made anonymously. When calling the Helpline from your country, you will be connected with an

interpreter in your chosen language to complete your report. If reporting online, you will be able to select the language for your report.