

RECRUITMENT AND HIRING PRIVACY STATEMENT

New Belgium Brewing Company, Inc. and Bell's Brewery (a division of New Belgium and together "**New Belgium**" or "**we**" or "**us**") respects your privacy and is committed to protecting your personal data. New Belgium protects the personal data we process and control relating to you ("**your personal data**"; "**your data**"). This statement is aimed at informing you of how and why your personal data will be used, namely for the recruitment and hiring process, and how long it will be retained. Visit [New Belgium Privacy Policy](#) for more information on New Belgium's privacy practices.

Data Protection Principles

New Belgium complies with data protection laws and principles, which means that your data will be:

- Used lawfully, fairly, and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you, and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Maintained only for as long as necessary for the purposes we have told you about, i.e., in relation to the recruitment and hiring process.
- Kept securely and protected against unauthorized or unlawful processing and against, loss or destruction using appropriate technical and organizational measures.

What Personal Data We Collect

The following categories of data will be collected by New Belgium in connection with our recruitment and hiring process:

- Your personal details;
- Data requested during the recruitment and hiring process (where allowed by applicable law);
- Data you submit in résumés/CVs, cover letters, or other written materials (including photographs and videos);
- Data generated by interviewers, recruiters, and onboarding personnel based on their interactions with you, or basic internet searches (where allowed under applicable law);
- Data provided by third-party placement firms, recruiters, or job-search websites, where applicable;
- Recommendations provided on your behalf by others;
- Documentation required under immigration laws;
- Data about your prior employment, education, and where applicable or allowed by law, driving records, criminal records, or other data revealed during background screenings;
- Data about your health or disability where it is relevant to your ability or availability to work or to a workplace accommodation, subject to legal limits on the timing of collection of such data and other applicable limitations; and
- Data about race, ethnicity, disability, gender identity, military/veteran status, for purposes of government reporting where required, as well as to support New Belgium's diversity goals, to evaluate the effectiveness of our equal opportunity policy, and promote diversity best practices.

You are not required to provide any requested information to New Belgium but failing to do so may result in not being considered for the job for which you have applied.

By submitting your information, you acknowledge that all representations made by you are true and correct to the best of your knowledge and belief, and you have not knowingly omitted any related information of an adverse nature. Providing any inaccurate information may make you ineligible for employment.

How New Belgium Uses Your Personal Data

New Belgium will use your personal data for the following purposes and on the following legal basis:

Purpose	Legal Basis
Assess your suitability for employment for the role for which you are applying, as well as future roles that may become available	New Belgium has a legitimate interest in ensuring that it recruits the appropriate coworkers for current or future roles
Manage your application and undertake pre-hire or onboarding actions	New Belgium has a legitimate interest in ensuring that it recruits/onboards the appropriate coworkers for current or future roles
Facilitate communication with you	New Belgium has a legitimate interest in ensuring proper communication within the organization and with you
Perform administrative functions (e.g., reimburse you for interview-related expenses)	New Belgium has a legitimate interest in ensuring that it recruits the appropriate coworkers for current or future roles
Perform data analytics, including analysis of our applicant pool in order to better understand who is applying to positions at New Belgium and how to attract and keep top talent, and to assist with the sourcing and screening (but not for final recruitment decisions) when processing high volume of applications	New Belgium has a legitimate interest in ensuring that it continually improves its recruitment processes
Build profiles of candidates, including analysis of candidate data to gauge compatibility with a particular job and to develop estimates of future performance. Candidacy selection and hiring decisions are reviewed and conducted by a New Belgium recruiting staff member and no automated decisions concerning candidacy are made without review by a New Belgium recruiting staff member.	New Belgium has a legitimate interest in ensuring that it recruits the appropriate coworkers for current or future roles.

Purpose	Legal Basis
<p>In some cases, record your answers to recruitment questions or interviews for review by additional New Belgium coworkers and hiring managers.</p>	<p>New Belgium has a legitimate interest in ensuring that it recruits the appropriate coworkers for current or future roles.</p>
<p>You may be entered into a database to receive future mailings about New Belgium positions, events, and other relevant information you might be interested in. You will always be able to opt out of any communication from New Belgium.</p>	<p>New Belgium has a legitimate interest in ensuring that it recruits the appropriate employees for current or future roles.</p>
<p>For purposes of hiring and ongoing employment, including:</p> <ul style="list-style-type: none"> • Conduct employee onboarding; • Maintain and administer payroll and employee benefit plans including enrollment and claims handling; • Maintain personnel records and complying with record retention requirements • Provide employees with human resources management services and employee data maintenance support services; • Communicate with employees and their emergency contacts and plan beneficiaries; • Comply with applicable state and federal labor, employment, tax benefits, workers' compensation, disability, equal employment opportunity, workplace safety, and related laws; • Prevent unauthorized access to or use of New Belgium property, including information systems, electronic devices, network, and data; • Ensure employee productivity and adherence to New Belgium policies. • Respond to law enforcement requests and as required by applicable law or court order; • Exercise or defend the legal rights of the New Belgium and its employees; • Design, implement, and promote New Belgium's diversity and inclusion programs; 	<p>New Belgium has a legitimate interest in being an employer of choice and ensuring compliance with state and federal laws and to implement our policies in a uniform and fair manner.</p>

Purpose	Legal Basis
<ul style="list-style-type: none"> • Perform workforce analytics, data analytics, and benchmarking; • Administer and design health wellness programs; 	
Perform any legally required reporting, and respond to legal process.	Compliance with legal obligations.

New Belgium will not use your personal data for purposes that are incompatible with the purposes listed in this Privacy Statement, unless it is required or authorized by law, or it is in your own vital interest (e.g.. in case of a medical emergency) to do so.

New Belgium will process your personal data for the purposes mentioned in the table above based on your prior consent, to the extent such consent is mandatory under applicable law. To the extent you are asked to accept this Privacy Statement in one of our recruiting tools, such acceptance will be considered as your consent to process your personal data only in countries where such consent is mandatory. In all other countries, clicking on acceptance/agreement buttons, will be considered as a mere acknowledgement of this statement.

From what sources will New Belgium obtain your personal data?

New Belgium may obtain data about you from the following sources:

- From you, when you submit resumes or other information online, as provided during the onboarding process or during your employment with New Belgium;
- From recruiters, interviews with hiring managers, and other New Belgium personnel or representatives during your employment, as well as from internet searches that these individuals may perform (where allowed by applicable law), or data that they may obtain from job search or professional networking websites (e.g. LinkedIn) where you may have made data about yourself publicly available;
- From previous employers;
- From social media (where allowed by applicable law);
- From third-party recruiters, staffing companies, or websites where you are introduced to New Belgium or with whom you interact with in the course of your employment. New Belgium does not accept unsolicited resumes from third party recruitment agencies, but does sometimes use such agencies subject to a written agreement. Any resume or other candidate information submitted outside of established candidate submission guidelines (including through email to any New Belgium coworker) and without a written agreement or otherwise will be deemed to be provided for New Belgium's use, and no fee will be paid should the candidate be hired by New Belgium; and
- From background checks, as applicable. New Belgium may contract with a third party to perform a pre-employment background screening (where required by the position and permitted by law).

The content of background check information varies to comply with local requirements, but may include information gathered from publicly available sources, your former employers or colleagues, schools you have attended, and criminal and motor vehicle records databases. You will receive more information about the nature of such a background check before it begins. You may be asked to provide certain background check information, (which may include sensitive data) directly to New Belgium (where required by applicable local law).

Access To Your Personal Data

In general, access to your personal data will be restricted to minimize the number of people at New Belgium who need it to perform their tasks and duties, and to third parties that have a legitimate purpose for accepting it.

The following categories of third parties will have access to your personal data:

- Recruiters working for New Belgium;
- Hiring managers and other interviewers;
- Onboarding personnel and benefit administrators;
- Individuals performing administrative and IT support functions;
- Authorized third-party service provider personnel, including those that:
 - host and support New Belgium hiring/recruitment/talent management/HR related systems;
 - host/manage virtual/online interviews;
 - provide analytics services to assist with/optimize the screening and sourcing process to find and hire candidates (always subject to a final human decision-making);
 - send recruitment experience feedback surveys to candidates who have applied for open jobs;
 - perform background screenings (where applicable). You will receive more information about any such check before it begins; and
 - any other recruitment, onboarding, and HR related service providers of New Belgium.
- Government officials where legal reporting requirements may exist, or law enforcement agencies, or private litigants in response to valid law enforcement process (warrant, subpoena, or court order);
- A third-party in connection with any proposed or actual work projects (to the extent allowed by applicable law); and
- A third-party in connection with any proposed or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of New Belgium business or assets (including in connection with any bankruptcy or similar proceedings).

We will implement appropriate measures to provide assurance that third-party organizations that we use to process data on our behalf use information in a manner consistent with this Privacy Statement and with applicable law, and that the security and confidentiality of the information is maintained. New Belgium does not sell personal data that we collect or process as part of the recruitment process or any related processes.

Retention of Your Personal Data

Your personal data will be stored in accordance with applicable laws and kept as long as needed to carry out the purposes described in this Privacy Statement. New Belgium may retain your data longer with your consent or for a legitimate business interest where we have assessed the business benefit and confirmed that this is not outweighed by your personal rights and freedoms.

Data Protection

We use technical and organizational measures that provide a level of security appropriate to the risk of processing your personal data. However, the security of information transmitted through the internet can never be guaranteed. You are responsible for maintaining the security of your password or other form of authentication involved in accessing password-protected or secured areas of any New Belgium recruitment web page. Access to and use of password-protected and/or secure areas of any New Belgium recruitment web pages is restricted to authorized users only.

Your Rights Related to Data Processing

Depending on where you are located, you may have certain rights under local privacy laws over the personal data we hold about you. These may include the right to:

- Access the personal data we hold about you.
- Have incorrect personal data updated or deleted.
- Have your personal data deleted.
- Restrict the processing of your personal data.
- Object to the processing of your personal data carried out on the basis of our legitimate interests.
- Receive a copy of your personal data in an electronic or machine-readable format.
- Not be subject to a decision based solely on automated processing, including profiling, which produces legal effects or otherwise significantly affects you (“**Automated Decision-Making**”). New Belgium does not perform Automated Decision-Making as part of the processing activities covered by this Privacy Statement.
- Receive the categories of sources from whom we collected your personal data.
- Complain to a data protection authority about our collection and use of your personal data. For more information, please contact your local data protection authority.

New Belgium will not discriminate against you for exercising your rights.

You, or an authorized individual who we can verify is acting on your behalf, can exercise the applicable rights by contacting us at contact@newbelgium.com.

Changes to This Privacy Statement

This Privacy Statement may be amended or revised from time to time at New Belgium’s discretion. If we propose to make any material changes, we will provide notice on this page prior to the change becoming effective. We encourage you to periodically review this page for the latest information on our privacy practices.

Contact Us

If you have any questions about this Privacy Statement, or wish to exercise your rights, please contact us at contact@newbelgium.com