

YETI Global Workforce Data Privacy Notice

Last Updated: December 30, 2022

1. Purpose

YETI respects your privacy and is committed to protecting it in accordance with applicable laws and best practices. This Global Workforce Data Privacy Notice describes how YETI Holdings, Inc., and its Affiliates (“YETI”, “We” or “Us”), collects, uses or processes, and discloses personal information about you, and how you can exercise your privacy rights. If you’re not sure about something in this Notice or have a concern regarding the way any personal information is being handled, please contact us using the contact details provided below.

2. Applicability

This Notice applies to the personal information of all YETI’s workforce, which for the purposes of this Notice includes full-time, part-time and former employees, applicants, contractors, temporary employees, owners, directors, and officers. “**Personal Information**” or “**Personal Data**” means any information or data YETI has collected or otherwise maintains or has in its possession (whether in electronic, hard-copy, or archival records) that identifies, relates to, describes, or can reasonably be associated with you.

3. What Personal Information Do We Collect?

The types of personal information YETI collects about you depends on your role with YETI. In the preceding twelve (12) months, it may include:

- Identification, contact information, and other similar identifiers (e.g., name, alias, address, phone numbers, work email address, personal email address).
- Recruitment information (e.g., information included in application forms, resume, or cover letter; some of which may overlap with other categories listed in this section).
- Employment, engagement, and other Human Resources information (e.g., department, position, marital status, hired date, emergency contact information; some of which may overlap with other categories listed in this section).
- Personal characteristics and demographic data, including characteristics of protected classifications under California, federal, or other laws (e.g., age, date of birth, race, color, sexual orientation, gender/gender identity/gender expression, ethnicity, veteran status).
- Government-issued identification numbers (e.g., driver’s license, passport number, social security number, national insurance number).
- Dependents and beneficiary information (e.g., name, relationship, social security number, birth date, gender).
- Financial information (e.g., credit history or credit checks, financial institution account information, payroll, pension or retirement contribution information, stock compensation information, and tax information).
- Criminal background information (e.g., felony convictions, misdemeanor convictions, infractions or violations, pending criminal cases, history of incarceration).
- Business travel and expense information (e.g., travel itinerary information, corporate expenses, and Company credit card usage).
- Education information, including information subject to the federal Family Educational Rights and Privacy Act (e.g., degrees or schooling, licenses, and professional memberships).
- Professional or employment-related information (e.g., job titles, work history, performance information, and similar data).

- Commercial information (e.g., products or services purchased, obtained, or considered using an @yeti.com email address; please refer to our [Consumer Privacy Policy](#) to learn more about our information practices in connection with activities carried out on YETI.com)
- Device/online information (e.g., information about use of the YETI network and communication systems, including user IDs, passwords, IP addresses, web logs, device IDs, and audit trails of system access, and information collected through our Mobile Device Management (“MDM”) software about the personal mobile device that you use to access YETI applications, such as the names of applications you have downloaded and the location of your device if it is lost or stolen).
- Audio, electronic, or visual information (e.g., CCTV footage, photographs taken at YETI functions or utilized for company identification purposes, voice recordings, and conference call recordings).

Using the information described above, we have also created the following table that describes the categories of personal information collected in the context of the California Consumer Privacy Act (“CCPA”). **This and the following sections also serve as YETI’s Notice at Collection under the CCPA and other applicable data protection and privacy laws.**

Category of Personal Information	Collected?
Identifiers, such as 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	Yes
Personal information categories listed in the California Customer Records statute, such as name, address, telephone number, bank account number, credit card number, or debit card number, some of this information may overlap with other categories	Yes
Characteristics of protected classifications under California or federal law, such as sex, age, and marital status	Yes
Commercial information, such as products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies	Yes
Biometric information, such as fingerprints and voiceprints	No
Internet or network activity information, such as browsing history, search history, and interactions with our internal websites	Yes
Geolocation data, such as YETI.com owned or managed device location	Yes
Audio, electronic, visual, similar information, such as call and video recordings	Yes
Professional or employment-related information	Yes
Education information subject to the federal Family Educational Rights and Privacy Act, such as student records	Yes
Inferences drawn from any of the Personal Information listed above to create a profile about a individual reflecting the individual’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	No
Sensitive personal information	Yes

Sensitive Personal Information

As noted above, some of the personal information categories listed above that we collect, process, and disclose may be considered “sensitive personal information” or “special categories of personal data” under applicable data protection and privacy laws. In the context of the workforce relationship, YETI collects the following categories of sensitive personal information:

- Personal information that reveals an individual’s:
 - Social security, driver’s license, state identification card, or passport number.
 - Racial or ethnic origin.
 - Contents of mail, email, and text messages unless the business is the intended recipient of the communication. For example, if you use your @yeti.com email address for personal use.

We only collect and process sensitive personal information where and to the extent permitted in accordance with applicable data protection and privacy laws. YETI does not use “sensitive personal information” for any purposes that are incompatible with the disclosed purpose for which it was collected or other than those permitted purposes authorized by data protection and privacy law.

4. How Do We Use Personal Information?

YETI collects and uses your personal information for its business purposes and where necessary, its service providers’ and contractors’ business purposes. These purposes include:

- Recruitment, including job advertising, interviewing, evaluating, selecting, and hiring new staff.
- Facilitation of a contractor relationship.
- Talent management and administration, including training, compensation, and benefits.
- Performance of business operations, including executing your job function; providing and monitoring IT systems; maintaining accounts and internal directories, protecting occupational health and safety; and similar purposes.
- Security operations, including detecting security incidents, debugging and repairing errors, preventing unauthorized access YETI’s computer and electronic communications systems.
- Legal and regulatory compliance and investigations such as complying with anti-bribery, tax, employment, social security and immigration obligations, and responding to and cooperating with legal or regulatory requests and investigations.

YETI does not “sell” or “share” any categories of personal information in the scope of this Notice, including “sensitive personal information”, within the meaning of the CCPA and other applicable data protection and privacy laws.

5. How Long Do We Retain Your Personal Information?

We plan to retain your personal information only for the period necessary to fulfill the purposes outlined in this Notice unless a longer retention period is required or allowed by law. When we determine that we have no ongoing legitimate business need nor lawful legal ground to process your personal information, we will take steps to delete, anonymize, or aggregate it or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will store your personal information until deletion is possible.

YETI determines retention based primarily on the type of record being retained. However, because a particular category of personal information may appear in different types of records, each with different retention periods, it may not be possible to specify a universal retention period for each particular category of personal information. Instead, the criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you (for example, for as long as you have an employment relationship with YETI);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, or litigation or regulatory investigations).

6. To Whom Do We Disclose Your Personal Information?

To assist us with establishing, managing, or terminating our workforce relationship with you, we may disclose your information with YETI employees, contractors, service providers, and other parties, including affiliates of YETI. In the preceding twelve (12) months, we may have disclosed your personal information to the following parties for the purposes described above in Section 4:

- **Internally with the YETI Coolers, LLC and Affiliates:** Such as YETI UK Limited, YETI Canada Limited, YETI Europe B.V., YETI Australia Pty Ltd., YETI Hong Kong Ltd., YETI Asia Pte Ltd., and YETI Japan G.K. in the performance of our business and for the purposes described in this Notice.
- **Service Providers:** Parties that provide employment services to us or on our behalf, such as information technology, background check services, data processing services, talent and payroll services, co-employers, and employers of record so that we may operate our business.
- **Contractors:** Parties that provide consulting services to us, such as information technology implementations and formal audits.
- **Entities involved in a Business Transaction:** Entities in connection with the sale, partnership, or merger of our business.
- **Entities involved in the Protection of YETI and Other Legal Compliance:** If required to do so by law or on a good faith belief that such disclosure is reasonably necessary to: (i) seek legal advice from YETI's in-house or outside counsel or in connection with litigation with a third party; (ii) comply with law or legal process (e.g., a subpoena or court order), requests from public or governmental authorities, and Internal Revenue Service ("IRS") or state filings; (iii) enforce our employment contract, this Privacy Notice or other contracts with you, including investigation or potential violations thereof and any unemployment claims; (iv) protect the rights, property or personal safety of YETI, its agents, affiliates, its users, and/or the public; (v) investigate security breaches; and (vi) to allow us to pursue available remedies or limit the damages that we may sustain. This includes exchanging information with other companies and organizations for fraud protection, spam/malware prevention, and similar purposes.
- **Consent:** With your explicit and informed consent.

YETI does not "sell" or "share" (for the purpose of targeted advertising or cross-contextual behavioral advertising), as it is defined by the CCPA and other data protection and privacy laws, the personal information described in this Notice as part of our workforce relationship; however, if you visit our website or otherwise interact with our online properties, our use of cookies and similar technologies (including those used for targeted advertising) may in some cases involve what some state laws classify as a "sale" or "sharing" of personal information. Please see our [Consumer Privacy Policy](#) for more details.

We also do not profile or use any form of automated processing, as defined by data protection and privacy law, on your personal information in furtherance of decisions that produce legal or similarly significant effects.

7. How Do We Collect Your Personal Information?

We collect personal information about you directly from you (e.g., as part of the application or onboarding process), devices that you use in connection with your employment (e.g., your YETI-provided or managed laptop), or, in some circumstances, we may collect it from other sources such as YETI's service providers (e.g., as part of the background check process) or derive it based on the other types of personal information we collect. We may also collect your personal information if it is publicly available.

8. Notice for Residents Outside of the United States

This Notice for workforce residing outside of the United States is provided to satisfy certain obligations that YETI has under international data protection and privacy law. YETI is the "data controller" of the personal information we handle under this Notice, which means that YETI is responsible for deciding how to collect, use, and disclose this information, subject to applicable law. At this time we are not required to appoint a Data Protection Officer under applicable data protection and privacy law.

9. What Are YETI's Legal Bases for Processing Your Personal Information?

Our legal bases for the collection, processing, and use of your personal information are:

- For performance of the contract of employment (e.g., to administer payroll and benefits), or to take steps at your request prior to entering into the contract.
- On the basis of our legitimate interests in managing the employment relationship with you and protecting our legal rights and securing our property.
- To address and comply with legal requirements and obligations.
- For the protection of vital interest of you or of another individual, such as in an emergency medical situation.
- With your clear consent (explicit consent where required), in accordance with local data protection and privacy laws.

Where the collection of personal information is required to comply with legal or contractual obligations, to manage the employment relationship, or to protect our legal rights or secure our property, the provision of personal information generally is mandatory. In all other cases, provision of requested personal information is optional; however, failure to provide the information may result in your inability to fully participate in the activity or benefit for which the personal information is requested, such as an optional benefit program. If you have any questions regarding whether provision of personal information is mandatory and the consequences for withholding such data, please contact us using the contact information in this Notice.

10. Do We Transfer Your Personal Information?

Your personal information may be transferred to countries which may not have the same or equivalent data protection laws as your country of origin. Where required, we make such transfers in compliance with applicable law, such as using standard contractual clauses (as published by the European Commission).

11. How Do We Secure Your Personal Information?

We seek to use various organizational, technical, and administrative security measures to reduce the risk that personal information in our possession and control will undergo accidental or unlawful destruction, loss, alteration, or unauthorized disclosure or access.

12. What Are Your Rights and Choices?

Depending upon the jurisdiction of which you are a resident, you may have legal rights to request access to, and deletion or erasure of, personal information that we hold about you, subject to certain exceptions.

You may also be entitled to receive, in portable form, a copy of the personal information you have provided to us or to request that we transmit it to another party. You may object to our processing of your personal information or request certain restrictions on the processing. You may also have the right to request that YETI corrects or rectifies any inaccurate personal information that we maintain, considering the nature of the personal information and the purposes of its processing. You may withdraw any consent you have provided for the processing of personal information (which will not affect the legality of any processing that happened before the request takes effect).

All such rights may be exercised by completing the [Privacy Rights Form](#) or by contacting YETI, as described below. Further instructions on how to submit a request and legal rights by jurisdiction are located within the form. We will not discriminate against you for exercising the above-mentioned rights. These rights are subject to legal exceptions and limitations, which we must consider when addressing the request.

We cannot honor your request (such as to provide you with requested personal information) if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

The verifiable consumer request must:

- When appropriate, provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative (e.g., name, email, mailing address).
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

If you are a California or Virginia resident, you may designate an agent to exercise your rights on your behalf. We reserve the right to take steps to verify the identity of the agent, and that your agent has been authorized to make a request on your behalf. Such steps may include requiring that the agent submit a copy of a qualifying power of attorney or requiring you to confirm the request with us directly. For legal and security reasons, we do not accept requests that would require us to visit an agent's website.

If you have any questions, concerns or complaints relating to our handling of personal information, please contact us as described in this Notice. You may also contact the relevant governmental authority or agency with a complaint related to our handling of your personal information. However, we invite you to give us a chance to resolve the situation directly. Your privacy is important to us, and we will do our very best to address your concerns.

13. Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to changing legal, technical, or business developments. You can see when this Notice was last updated by checking the "LAST UPDATED" date displayed at the top of this Privacy Notice.

14. Who Do I Contact with Questions or to Exercise My Rights?

To exercise your rights described in this Notice, please complete YETI's [Privacy Rights Form](#). As an alternative method to exercise your privacy rights, or to notify us of your preferences or provide us with complaints, concerns or questions, please contact us as follows:

United States

YETI Coolers, LLC
7601 Southwest Parkway
Austin, TX
78716
833-225-9384
privacy@yeti.com.

Canada

YETI Canada Limited
300 Town Centre Blvd., Suite 101
Markham
Ontario L3R 5Z6
833-225-9384
privacy@yeti.com.

United Kingdom

YETI UK Limited is registered with the UK Information Commissioners Office as a Data Controller. Our registration number is ZA862884. Its registered office is at:

100 New Bridge Street
London, England
EC4V 6JA UK
0808 1697080
.help@yetiuropecustomerservices.com.

European Union / European Economic Area

YETI UK Limited is the data controller of the Personal Information collected through our Services. Its registered office is at 100 New Bridge Street, London, England, EC4V 6JA UK. YETI UK Limited is registered with the UK Information Commissioners Office as a Data Controller. Our registration number is ZA862884.

Our representative in the EU is First European Data Rep BV. Its registered office is at:

Schiphol Boulevard 195
1118 BG Schiphol
The Netherlands.
yeti@eudatarep.com.

Australia

YETI Australia PTY Limited
1/43-49 Buckhurst St
South Melbourne, Victoria
Australia 3205
1300 289 384
privacy@yeti.com.

New Zealand

YETI Australia PTY Limited
1/43-49 Buckhurst St
South Melbourne, Victoria
Australia 3205
800 448 708
privacy@yeti.com.

People's Republic of China

12F Room 1258
331 North Cao Xi Lu
Xuhui District
Shanghai 200030
privacyprc@yeti.com.

For residents of any other jurisdiction, or to reach out to YETI's Senior Privacy Counsel directly, please contact us at privacy@yeti.com.