Gordon FOOD SERVICE	**Policy Name:** Biometric Data and Driver Monitoring Privacy Policy	
	Policy Owner: Privacy Officer; Director, Human Resources	**Date of Last Revision: N/A** **Date Created: 05/01/2026**
	Approved By: General Counsel, Senior Director, Human Resources	**Type:** Complete Revision: ( ) Partial Revision: () New: (X)

Biometric Data and Driver Monitoring Privacy Policy, HR016

Purpose & Scope:

Gordon Food Service, Inc. and its affiliates and subsidiaries (collectively "GFS") have implemented Dashcams in our GFS Vehicles that are designed to promote safe driving, reduce distracted driving, control costs, and the other specific purposes described in further detail below. These Dashcams include systems for AI monitoring of driver behavior, video recording, vehicle telematics, and other technologies. Distracted driving is any activity that diverts attention from driving, including but not limited to talking or texting on your cell phone, drowsiness, eating and drinking, talking to people in your vehicle, and interacting with the stereo. The Dashcams are designed to alert drivers to correct these driving behaviors.

GFS uses Dashcams in GFS Vehicles. GFS and/or its service providers may use the Dashcams to collect and use Biometric Data, Location Data, and System Data from or about GFS employees and GFS Vehicles. This Biometric Data and Driver Monitoring Privacy Policy (the "Policy") sets forth GFS' policy for the collection, use, safeguarding, storage, retention and destruction of Biometric Data, Location Data, and/or System Data.

Definitions:

"**Biometric Identifier**" means a retina or iris scan, fingerprint, voiceprint, scan of hand, a facial map, facial template, or face geometry or any other unique biological, physical, or behavioral patterns or characteristics. Biometric Identifiers generally do not include writing samples, written signatures, photographs, human biological samples used for valid scientific testing or screening, demographic data, tattoo descriptions, or physical descriptions such as height, weight, hair color, or eye color.

"**Biometric Information**" means any information, regardless of how it is captured, converted, stored, or shared, based on an individual's Biometric Identifiers, singly or combination with other personal information, used or intended to be used to identify any individual. Biometric Information does not include information derived from items or procedures excluded under the definition of Biometric Identifiers.

"**Biometric Data**" means both or either Biometric Identifier or Biometric Information collected by Dashcams.

"**Dashcams**" means in-dash cameras and related vehicle monitoring systems in GFS Vehicles that enable GFS and its service providers to monitor (i) Driver behavior through the use of video, biometrics and AI and (ii) vehicle Location Data. Dashcams may also collect System Data.

"Driver" or "**Drivers**" means drivers of GFS Vehicles.

"**GFS Vehicle**" means any vehicle such as a delivery truck, van, or other vehicle that is owned or leased by GFS.

"**Location Data**" means the precise Global Positioning System ("GPS") location collected by Dashcams.

"**System Data**" means the data other than Biometric Data and Location Data collected by Dashcams, such as video recordings, data about driving behavior, and telematics data (such as tracking speed, fuel, maintenance needs, harsh braking and turning, speed, and acceleration).

Policy:

Purposes for Collection of Biometric Data, Location Data, and System Data
GFS and its service providers may collect, possess, store, and/or use scans of Drivers' face geometry, which may be considered Biometric Data, to identify and correct unsafe driving behaviors, such as distracted driving; investigate and respond to incidents, accidents, property damage or vehicle damage (including to defend against claims); verify identity or match drivers across trips; and for analytics and development and improvement of offerings and services (the "Purpose").

GFS and its service providers may collect, possess, store, and/or use Drivers' and GFS Vehicles' Location Data and System Data to identify and correct unsafe driving behaviors, such as distracted driving; investigate and respond to incidents, accidents, property damage or vehicle damage (including to defend against claims); manage fleet efficiency; determine vehicle location; and for analytics and development and improvement of offerings and services.

Authorization
When processing Biometric Data or Location Data, GFS will:

- Inform each Driver in writing that GFS and/or its service providers may be collecting, processing, storing or using the Driver's Biometric Data and/or Location Data;
- Inform each Driver in writing of the specific purpose, circumstances and manner of such collection, processing, storage or usage, including the length of time of storage, if applicable;

- Inform each Driver in writing of the manner in which the Driver may opt out of the collection, processing, storage or usage of their Biometric Data and/or Location Data, subject to the Employment Advisory below; and
- If the Driver consents to the collection, processing, storage or usage of their Biometric Data and/or Location Data, receive a written release signed by the Driver authorizing GFS and its service providers to collect, store and use Biometric Data and/or Location Data for the specific reasons set forth in the written release. See **APPENDIX A** attached below**.**

Only GFS-authorized Drivers are permitted in the cab of GFS Vehicles. Passengers are strictly prohibited unless approved in advance by GFS.

Employment Advisory
The Dashcams serve an important role in ensuring the safety of Drivers and the public, so Drivers who do not wish to participate in the biometric monitoring program are ineligible for roles requiring the operation of GFS Vehicles. As such, employees are advised that agreeing to this Policy is a condition of employment with GFS. As operating a GFS Vehicle equipped with a Dashcam is an essential function of the Driver role, refusal to provide or revocation of consent to this Policy may result in separation from employment.

Disclosure of Biometric Data
GFS will not disclose, re-disclose or otherwise disseminate any Biometric Data unless:

- The Driver consents to the disclosure or dissemination;
- Disclosure or re-disclosure completes a financial transaction requested or authorized by the Driver;
- Disclosure or re-disclosure is required by state or federal law or municipal ordinance; or
- Disclosure is required pursuant to a valid warrant or subpoena issued by a court of competent jurisdiction.

GFS will not knowingly sell, lease, trade, or otherwise profit from a Driver's Biometric Data.

Retention Schedule for Biometric Data
GFS will retain Driver Biometric Data until the first of the following options occurs:
- The Purpose for collecting or obtaining the Biometric Data has been satisfied, such as GFS is no longer using Biometric Data for the Purpose;
- Within one year of the Driver's last interaction with GFS; or
- The earliest reasonably feasible date, which date shall be not more than forty-five (45) days after GFS determines that storage of the Biometric Data is no longer necessary.

Data Storage and Security for Biometric Data

To the extent GFS collects, stores and retains Biometric Data, it shall maintain reasonable physical, administrative and technical safeguards to store, transmit, and protect from disclosure any such Biometric Data collected, stored or retained. Such storage, transmission, and protection from disclosure shall be performed in a manner that is the same or more protective than the manner GFS transmits, stores, and protects from disclosure other confidential and sensitive information.

GFS maintains an incident response plan designed to detect, respond to and recover from security incidents that may impact personal information, including Biometric Data. In the event a security incident at GFS or one of its service providers adversely impacts Biometric Data, we will, to the extent required by applicable law, provide Drivers with notice.

Procedure

GFS will make this Policy publicly available on its website. Existing employees who will drive for the company will be provided the means to review and agree to the Policy and Consent in Workday.

In Workday, after reviewing the Policy and Consent Form employees will check a box that provides: [x] "*I provide my express, informed, written release and consent to GFS Processing my Biometric Data and Location Data as outlined in the Biometric Data and Driver Monitoring Consent Form*."

Revision History

Revision #	Summary of Revision / Change	Revision Date
N/A	New Policy	5/1/2026

APPENDIX A

Gordon Food Service, Inc.
Biometric Data and Driver Monitoring Consent Form

(*Appears on the next page*)

Gordon Food Service, Inc.
Biometric Data and Driver Monitoring Consent Form

1. I, the person signing below, acknowledge that I have been presented with and reviewed the Biometric Data and Driver Monitoring Privacy Policy of Gordon Food Service, Inc. and its affiliates and subsidiaries (collectively "GFS"), available at https://gfs.com/en-us/privacy-policy and the GFS Employee Handbook.

2. I acknowledge that GFS may collect, store, and use (collectively, "Process") scans of my face geometry, which may be considered a biometric identifier and/or biometric information (collectively, "Biometric Data") to identify and correct unsafe driving behaviors, such as distracted driving; investigate and respond to incidents, accidents, property damage or vehicle damage (including to defend against claims); verify identity or match drivers across trips; and for analytics and development and improvement of offerings and services (the "Biometric Data Purpose").

3. I acknowledge that GFS may Process the precise GPS location of GFS vehicles equipped with dashcams ("Location Data") to identify and correct unsafe driving behaviors, such as distracted driving; investigate and respond to incidents, accidents, property damage or vehicle damage (including to defend against claims); manage fleet efficiency; determine vehicle location; and for analytics and development and improvement of offerings and services (the "Location Data Purpose").

4. I have been informed and understand that GFS may use one or more service providers to Process my Biometric Data for the Biometric Data Purpose and my Location Data for the Location Data Purpose. I consent to and authorize GFS to disclose my Biometric Data and Location Data to such service providers, and consent to and authorize such service providers to Process my Biometric Data and Location Data. I acknowledge that such disclosures do not constitute the sale, leasing, or trade of my Biometric Data. I understand that I will not receive an updated notice if GFS changes or engages new service providers.

5. I understand that my Biometric Data will be permanently deleted upon the first of the following: (a) satisfaction of the Biometric Data Purpose; (b) within one year of my last interaction with GFS; or (c) the earliest reasonably feasible date, not more than forty-five (45) days after GFS determines that storage of the Biometric Data is no longer necessary.

6. I understand that by signing below or checking the box(es) associated with this Biometric Data and Driver Monitoring Consent Form, I provide my express, informed, written release and consent to GFS:

a. Processing my Biometric Data as outlined herein; and/or (as applicable)
b. Processing my Location Data as outlined herein.

7. I understand that I may opt out of the collection, processing, storage or usage of my Biometric Data and Location Data by emailing privacy@gfs.com. However, I also understand that drivers who do not wish to participate in the biometric monitoring program are ineligible for roles requiring the operation of GFS vehicles. I understand that signing this written release is a condition of my employment with GFS. If I refuse to provide or revoke my consent, I understand my employment may be terminated.

_____	*E-signed in Workday*
Name (print)	Signature
_____	
Date	