

CALIFORNIA PERSONNEL AND JOB APPLICANT PRIVACY NOTICE AND NOTICE AT COLLECTION

This California Personnel and Job Applicant Privacy Notice and Notice at Collection (“**Privacy Notice**”) describes how Los Angeles Capital Management LLC (“**Los Angeles Capital**”, “**we**”, “**us**” and “**our**”) collects, uses, and discloses information about our current and former employees, contractors, consultants, and applicants for employment or contractor positions and their beneficiaries and emergency contacts who are residents of the state of California (“**you**” or “**your**”) in the context of our working relationship with the relevant individuals. Information about California residents collected, used, and disclosed in this context is “**personal information.**”

Please note:

- This Privacy Notice does **not** apply to our handling of personal information gathered about you in your role as a user of our services. If you interact with us as in that role, the financial information [privacy policy](#) associated with the relevant service applies.
- This Privacy Notice does **not** form part of any employment contract or contract to provide services. In addition, if you provide services to us through or in connection with another company, we are not responsible for that company’s privacy practices.

This Policy will be posted on our intranet and attached to the Employee Handbook and will be provided to new workforce members as part of the onboarding process.

We may update this Privacy Notice at any time and will notify you of such updates by email or through a notice on our company intranet. We may also provide you additional privacy notices regarding our collection, use or disclosure of information. Please read all such notices carefully.

1. Personal information that we collect

We may collect and process various types of personal information through our application, recruitment, and employment processes. We collect such information either directly from you or (where applicable) from another person or entity, such as an employment agency or consultancy, recruiter, background check provider, or other referral sources.

The type of personal information we collect depends on your role and may include, where applicable:

- **Identification and contact information and related identifiers**, such as real name, alias, postal address, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, state identification card number, passport number, and signature.
- **Legally protected classification information**, such as age (40 years or older), race, color, national origin, ancestry, citizenship, marital status, medical condition, physical or mental

disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status, and criminal history.

- **Professional or employment-related information**, including:
 - **Recruitment, employment, or engagement information** such as application forms and information included in a resume, cover letter, or otherwise provided through any application or engagement process; and copies of identification documents, such as driver's licenses, state identification cards, passports, and visas; information about your entitlement to work in the U.S.; and background screening results and references;
 - **Career information** such as job history, performance evaluations, job position, absences, benefits information, and a copy of your employment agreement; information about your qualifications, skills, experience, licenses, and professional references; and
 - **Financial information** such as tax information, salary, payroll, pension or retirement contribution information, and bank account information.
- **Education Information** such as institutions attended, degrees, certifications, training courses, publications, and transcript information.
- **Audio or visual information** such as photographs and videos of you for use in our publications, including on our intranet.
- **Internet, electronic network, and device activity and device information and related identifiers** such as information about your use of our network, communications systems, and devices provided by us, including the content, date and time of your email correspondence; browser history, search history and your access to our office.
- **Geolocation information** related to your use of our network, communications systems, or devices provided by us.
- **Biometric information** that we use for physical and electronic security such as fingerprint or face identification.
- **Sensitive personal information** such as Social Security number, driver's license number, state identification card number, and religious beliefs. Some other information listed above, such as biometric information, may be considered "sensitive personal information" under California law.
- **Other information that directly or indirectly identifies you**, such as, date and place of birth, emergency contact details, your date of hire, names of your related parties, information from public sources or regulatory filings, and information about you collected via a search of various sanctions lists.

Personal information does not include your personal information that has been de-identified, pseudonymized, anonymized, aggregated, and/or otherwise processed so as to be unidentifiable in such a way that the data can no longer be attributed to a specific individual (by reasonable means)

without the use of additional information, and where such additional information is kept separate and under adequate security to prevent unauthorized re-identification of a specific individual such that one could not, using reasonable efforts, link such information back to a specific individual (the foregoing in this sentence being referred to as “**De-Identified Personal Information**”).

2. Uses of personal information

We may collect and use your personal information for the following purposes, where applicable:

- **HR management and administration**, including training, compensation and benefits, invoices, leave, scheduling, career development, performance appraisals and recognition, investigating and resolving inquiries and complaints, providing references, succession planning, organizational changes, fraud prevention and investigation, managing occupational health and safety claims, preparing analyses and reports, and communicating with our workforce, and contacting your emergency contact, or beneficiaries in the event of an emergency or as otherwise appropriate.
- **Legal compliance**, such as complying with tax, social security, immigration, regulatory requirements and filings, and employment-related obligations, and responding to and cooperating with legal or regulatory requests and investigations; and to exercise our legal and contractual rights.
- **Performance of business operations**, including providing and monitoring IT systems for any lawful purpose; maintaining accounts and internal directories, business continuity and crisis management, protecting occupational health and safety; participating in due diligence activities related to the business; business succession planning and conducting internal analyses and audits.
- **Recruitment**, including job advertising, interviewing, and selecting and hiring new staff.
- **Security operations**, including detecting security incidents, debugging and repairing errors, and preventing unauthorized access to our computer and electronic communications systems and preventing malicious software distribution; and monitoring and controlling access to company premises and locations (including through use of CCTV).
- **Precise Geolocation information** related to your use of our network, communications systems, or devices for information security purposes.
- **With your consent**, we may use your personal information for any other legally permitted purpose.

Certain information we collect may be “**sensitive personal information**” under the California Consumer Privacy Act (“**CCPA**”). We use such information as legally necessary to conduct our relationship with you, in the following ways:

- Social Security number, driver’s license, state identification card, or passport information for legal compliance, payroll, benefits, tax, and immigration purposes.

- Biometric information for physical and electronic security and/or timekeeping purposes.
- Contents of emails sent over our network or using communications systems or devices provided by us for legal and regulatory compliance, security and workforce management purposes.
- Health information, which may include disability status, to provide reasonable workplace accommodations and manage absences, for workplace health and safety purposes, and for compliance with applicable law and contracts or to exercise rights thereunder.
- Racial/ethnic origin, and/or disability status for equal opportunity and diversity and inclusion purposes and compliance with applicable law or to exercise rights thereunder.
- Religious belief for HR management of benefits and compliance with applicable law or to exercise rights thereunder.

3. Disclosure of personal information

We may disclose personal information to the following types of entities or in the following circumstances, as applicable:

- **Internally:** to people within Los Angeles Capital and its corporate affiliates to carry out the purposes described in this Privacy Notice, including to your manager, human resources, as well as personnel within the Company, such as IT, legal, compliance, and finance.
- **Service providers, contractors, agents, and third parties** including, but not limited to, payroll service providers, insurance providers, employee benefits providers, background check providers, IT and communications providers, compliance, legal and other professional advisors, accountants, auditors, and travel and corporate credit card providers.
- **Business operations:** to provide another entity (such as a potential or existing business counterparty or customer) with a means of contacting you in the normal course of business, for example, by providing your contact details, such as your phone number and email address.
- **Business transaction purposes:** in connection with a merger, acquisition, divestiture, restructuring, reorganization, dissolution, or a sale or other transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.
- **Legal compliance and exercising legal rights:** to the extent required by law, regulation, or court order or in response to a request for assistance by the police or other law enforcement agency; and to seek legal advice from our external lawyers or in connection with litigation with a third party; and to establish, exercise or defend our legal rights.
- **Litigation Purposes:** to seek legal advice from our external lawyers or in connection with litigation with a third party.

- **Consent:** with your consent and as permitted by law, we may share personal information with any other third parties in any other circumstances.

4. Retention

We will retain personal information in accordance with our retention policy, for as long as necessary to fulfill the purpose(s) for which the information is collected and used, to fulfill our legitimate business interests (such as backing up systems or maintaining our records), and/or as required by our legal obligations. In determining how long to retain information, we consider the amount, nature and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the personal information, the purposes for which we process the personal information and whether we can achieve those purposes in other ways, the applicable legal requirements, and our legitimate interests.

For example, we will keep certain information about former employees (e.g., name job title, organizational hierarchy, and records of employment) for as long as necessary for our legitimate interests in keeping this information as part of our organizational history and to confirm the facts of their employment with us and to comply with law. The purposes we process information (as well as the other factors listed above) may dictate different retention periods for the same types of information. For example, tax records that have employee names are normally retained for ten years after the deadline to make the applicable filing, while employee names in email headers may be kept indefinitely depending on the nature of the email.

5. Rights of California Residents

You have the right to know the categories of personal information we have collected about you over the past 12 months, including the categories of data sources from which it is collected, the business or commercial purpose for collecting and disclosing, and categories of third parties to whom we disclose, and the specific pieces of personal information we have collected about you, as described in detail above in Sections 1-3.

Subject to certain exceptions, you (or an agent you have authorized to act on your behalf) may also request:

- Access to a copy of your personal information;
- Correction of personal information we have about you that is inaccurate; and
- Deletion or removal of your personal information.

To exercise any of the rights above, please contact us (or instruct your authorized agent to do so) using the contact information below. Please provide your name, the right(s) you wish to exercise, and the personal information with regard to which you want to exercise such right(s). You have the right not to be discriminated against (as provided for in California law) for exercising any of the rights above.

We will take reasonable steps to verify your identity before responding to a request. In doing so, we may ask you for verification information so that we can match at least two verification points

with information we maintain in our files about you. If we are unable to verify you through this method, we shall have the right, but not the obligation, to request additional information from you.

There are a number of exceptions to these above rights. For instance, we may retain your personal information if it is reasonably necessary to comply with a legal obligation, including but not limited to relevant records retention requirements.

We do not “sell” or “share” (as defined in the CCPA) personal information covered by this Privacy Notice and have not done so in the 12 months prior to the effective date of this Privacy Notice.

6. Contacting Us

If you have questions about any of the information in this Privacy Notice, or to exercise any of your rights as provided herein, please contact Compliance-Privacy at (888) 531-0306 or email privacy@lacapm.com.

Last updated and effective as of December 2023