

California Applicant Privacy Notice



Last Updated: July 2024

Partners Capital Investment Group, LLP (“Partners Capital”) provides this Privacy Notice (“Notice”) to explain our practices regarding the collection and use of Personal Information about California job applicants, employees, contractors, and others who work for us (collectively, “Personnel”) within the context of your application for, or employment at Partners Capital. This Notice explains what Personal Information we collect about California Personnel, why we collect it, how we use and share it, and the rights you have relating to your Personal Information under the California Consumer Privacy Act, as modified by the California Privacy Rights Act of 2020 (the “CCPA”).

As used in this Notice, the term “Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. Personal Information does not include information that is publicly available, de-identified, or aggregated.

How and Why We Collect Your Personal Information

Within the past 12 months, we collected Personal Information about our Personnel as follows:

Category of Personal Information	Purposes for Collection / Use
<p>Identifiers and personal records including real name, alias, postal address, telephone number, signature, IP address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers; education, employment, employment history and financial information. <i>This includes categories of Personal Information described in Cal. Civ. Code § 1798.80(e), and includes Personal Information that reveals a Social Security, driver’s license, state identification card or passport number, which is classified as sensitive under the CCPA.</i></p> <p>Professional information, including:</p> <p>Recruitment information (such as skills, qualifications, career interests, references including development information, recommendations, other talent management and team-based assessments, and other information included in a resume, application form, or cover letter)</p> <p>Background information commonly used for onboarding and security screenings</p>	<ul style="list-style-type: none">To communicate with youTo assess your eligibility for employmentTo open and maintain application recordsTo manage corporate information technologyTo comply with applicable laws and regulationsTo manage the security of our property and systemsTo detect and prevent fraud against you and/or us
<p>Characteristics of protected classifications under California or federal law, including age and date of birth, marital status, race, ancestry, ethnic origin, sex, sexual orientation, gender, gender identity, citizenship or immigration status, religion or creed, military or veteran status, medical condition, disability, marital status. <i>This category includes information considered sensitive under the CCPA.</i></p>	<ul style="list-style-type: none">Meeting legal, compliance, and recordkeeping requirementsTo facilitate our diversity, equity, and inclusion initiatives

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<p>Internet or other electronic network activity information, including browsing history, search history, and information regarding your interactions with our websites or applications</p> <p>Geolocation data inferred from your IP address or based on employee access-control card usage. <i>This category includes precise geolocation data, which is considered sensitive under the CCPA.</i></p>	<p>To manage corporate information technology</p> <p>To facilitate online job applications</p> <p>To manage job duties and operate our business</p> <p>To provide job applicants with tailored recommendations and updates</p> <p>To improve our website, set default options, and provide you with a better job application experience</p> <p>To protect the security of our property and systems</p> <p>To detect and prevent fraud against you and/or us</p>
<p>Audio, electronic, visual, thermal, olfactory, or similar information, including closed-circuit images, photographs and video of you (for ID badges, marketing materials, etc.), and audio recordings as may relate to your job functions</p>	<p>To communicate with you</p> <p>To manage the security of our property and systems</p> <p>To manage job duties, evaluate performance, and operate our business</p> <p>To market our services and expertise (e.g., through employee bios)</p>
<p>Non-public education information, including school(s) attended, grades, transcripts, records of attendance, disciplinary records, and other information relating to your secondary and post-secondary education</p>	<p>To assess your eligibility for employment</p> <p>To onboard and enroll you as an employee</p>
<p>Inferences reflecting preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes</p>	<p>To assess your eligibility for employment</p> <p>To manage job duties, evaluate performance, and operate our business</p> <p>To manage corporate information technology</p> <p>To detect and prevent fraud against you and/or us</p>

We may also use and disclose Personal Information as required by law, regulation or court order; to respond to governmental and/or law enforcement requests; to identify, contact or bring legal action against someone who may be causing injury to or interfering with our, our clients' or others' rights or property; to support any actual or threatened claim, defense or declaration in a case or before any jurisdictional and/or administrative authority, arbitration or mediation panel; or for other purposes described in any other privacy notice or with your consent. Additionally, we may use and disclose Personal Information to third parties in connection with a sale, assignment, merger, reorganization, or other corporate transaction relating to all or part of our business.

Sources of Personal Information

We collect the categories of Personal Information described above from the following categories of sources:

- **Directly from you.** For example, as part of your job application, during the onboarding process, and throughout your interactions with us
- **Created by us.** For example, your company email address or inferences about you

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- **Automatically.** For example, when you use our websites, electronic systems, and applications; from security camera footage; and from access-card data
- **From service providers that help us run our business.** For example, from human resources and information technology vendors, background check agencies, benefits providers, and other service providers
- **From other sources.** For example, from recruiters, references, clients, colleagues, educational institutions, professional organizations, and other parties that may provide us with information relevant to your employment or application for employment

How Long We Keep Your Personal Information

How long we will hold your personal data for will vary and will be determined by the following criteria:

- I. the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
- II. legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

Disclosures of Personal Information

We may disclose each of the categories of Personal Information we collect to our service providers and contractors for the following business purposes:

- Performing services (including processing, maintaining, or collecting Personal Information) on our behalf in support of the purposes for which we collect the Personal Information as described above (e.g., providing communications, technical, analytical, web hosting, cloud hosting and application support, HR support, travel, expense management, payroll and benefits support, among other services)
- Ensuring security and integrity of Personal Information
- Debugging to identify and repair errors that impair existing intended functionality
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of our services
- To comply with applicable laws and regulations
- For safety and security
- Detecting, protecting against, or addressing malicious, deceptive, fraudulent, or illegal activity

We disclose Sensitive Personal Information for more limited purposes, including: when necessary for us to meet our obligations to you or for you to meet your obligations to us as part of our Personnel; services performed on our behalf related to the operation of our business and/or the employment process; to comply with applicable laws and regulations; for safety and security; detecting, protecting against, or addressing malicious, deceptive, fraudulent, or illegal activity.

Submitting Requests Relating to Your Personal Information

If you are a resident of California, you have the right to submit certain requests relating to your Personal Information as described below. To exercise any of these rights, please submit a request through our [webform](#) or call us at +1 617 292 2570. Please note that, if you submit a request to know, request to delete or request to correct, you will be asked to provide 2-3 pieces of Personal Information that we will match against our records to verify your identity.

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You may designate an authorized agent to make a request on your behalf; however, you will still need to verify your identity directly with us before your request can be processed. An authorized agent may submit a request on your behalf using the webform or contact number listed above.

Right to Know. You have the right to know what Personal Information we have collected about you, which includes:

- The categories of Personal Information we have collected about you, including:
 - The categories of sources from which the Personal Information was collected
 - Our business or commercial purposes for collecting or disclosing Personal Information
 - The categories of recipients to which we disclose Personal Information
 - The categories of Personal Information that we disclosed for a business purpose, and for each category identified, the categories of recipients to which we disclosed that particular category of Personal Information
- The specific pieces of Personal Information we have collected about you

Right to Delete Your Personal Information. You have the right to request that we delete Personal Information we collected from you, subject to certain exceptions. Where we use deidentification to satisfy a deletion request, we commit to maintaining and using the information in deidentified form and will not attempt to reidentify the information.

Right to Correct Inaccurate Information. If you believe that Personal Information we maintain about you is inaccurate, you have the right to request that we correct that information.

Right to Opt Out of Sales and Sharing of Personal Information. We do not sell the personal information of California Personnel that we collect in relation to your application for or employment at Partners Capital or share such Personal Information for cross-context behavioral advertising.

Right to Limit Use and Disclosure of Sensitive Personal Information. We do not use or disclose Sensitive Personal Information for purposes to which the right to limit use and disclosure applies under the CCPA.

Right to Non-Discrimination for the Exercise of Your Privacy Rights. If you choose to exercise any of your privacy rights under the CCPA, you also have the right not to receive discriminatory treatment by us, including retaliation against you as an employee, job applicant, or independent contractor.

How to Contact Us

If you have any questions about how Partners Capital handles your Personal Information or if you need to access this notice in an alternative format or language, please contact our People Team at:

Phone: +1 617 292 2570

Email: hr.us@partners-cap.com