

California Resident Privacy Notice

Last Updated: December 2022

This California Resident Privacy Notice is provided in connection with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “CCPA”), by Stockbridge Capital Group, LLC (together with its affiliates, “Stockbridge,” “we,” “our” or “us”) and applies to our consumers who reside in the State of California, including prospective and current clients, investors, service providers, business partners, prospective and current employees, “our website” visitors and others to whom we may collect information. A California resident is a natural person (as opposed to a corporation or other business entity) who resides in California, even if the person is temporarily outside of the state. This California Resident Privacy Notice explains how we collect, use and disclose personal information relating to California residents (referred to herein as “you” or “your”) and how you may exercise your rights under the CCPA. Only California residents have rights under the CCPA.

What is Personal Information?

Under the CCPA, “personal information” is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly with you or your household. For example, it could include your name, social security number, email address, records of products purchased, internet browsing history, geolocation data, fingerprints, and inferences from other personal information that could create a profile about your preferences and characteristics. directly or indirectly, with a particular California resident or device. The CCPA does not apply to certain personal information that is subject to certain federal privacy laws, such as the Gramm-Leach-Bliley Act and Health Insurance Portability and Accountability Act.

“Sensitive personal information” is a specific subset of personal information that includes certain government identifiers (such as social security numbers); an account login, financial account, debit card, or credit card number with any required security code, password, or credentials allowing access to an account; precise geolocation; contents of mail, email, and text messages; genetic data; biometric information processed to identify a consumer; information concerning a consumer’s health, sex life, or sexual orientation; or information about racial or ethnic origin, religious or philosophical beliefs, or union membership. Consumers have the right to also limit a business’ use and disclosure of their sensitive personal information.

Personal information does not include “publicly available information” that is from federal, state, or local government records, such as professional licenses and public real estate/property records. The definition of publicly available information also includes information that a business has a reasonable basis to believe is lawfully made available to the general public by the consumer or from widely distributed media, or certain information disclosed by a consumer and made available if the consumer has not restricted the information to a specific audience.

The CCPA also exempts certain types of information such as certain medical information and consumer credit reporting information.

Collection, Use and Disclosure of Personal Information

We collect, use and disclose personal information relating to California residents based on the nature of our relationship with such residents. For example, we collect certain personal information relating to individuals who request or obtain our products or services for themselves or on behalf of an individual or entity, apply for employment with us, or are our employees, vendors, contractors, or similar personnel, or visitors to our locations or facilities.

Categories of Personal Information Collected

The personal information we may collect about California residents includes information within the categories below. We do not collect all information listed in a particular category, nor do we collect all categories of information for all individuals.

- Identifiers such as name, alias, postal address, social security number, passport number, driver’s license number and internet protocols (IP) address

- Biometric information such as eye color, hair color and height
- Commercial purchasing information such financial data, records of buying property and products purchased
- Consumer record information such as physical characteristics and descriptions, bank card information, education, telephone number and health information
- Education information that is not considered publicly available information
- Employment information such as place of work or past jobs
- Geolocation data
- Information related to the senses such as visual, audio, thermal and olfactory information
- Internet and electric network activity such as search history, browsing history or information regarding a consumer's interaction with a website, application or advertisement
- Legally protected characteristics such as race, religion, gender identity and expression
- Inferences that can be made from the above information

We may collect this personal information directly from you or from the following types of sources: providers of demographic information, credit bureaus, advertising networks, internet service providers, data analytics providers, government entities, operating systems and platforms, and data brokers.

Purpose and Use of Personal Information Collected

We do not sell any personal information collected from you to third parties. The purposes for which we use the personal information that we collect depend on our relationship or interaction with a specific California resident. Generally, we use personal information:

- to operate, manage, and maintain our business;
- to provide you with our products and services;
- for our employment and vendor management processes; and
- as directed by the individual the personal information is about or with their consent

For example, we use personal information to personalize, develop, and market our products and services; conduct research and data analysis; maintain our facilities and infrastructure, protect health and safety; operate and manage IT and communications systems; facilitate communications; conduct risk and security control and monitoring; detect and prevent fraud; perform identity verification; perform accounting, audit, and other internal functions, such as internal investigations; comply with the law, legal process and internal policies; maintain records; and exercise and defend legal claims.

Disclosure of Personal Information Collected

In the past 12 months, we have disclosed the following categories of personal information relating to California residents to the following categories of third parties for our business purposes.

	Our affiliates	Service Providers	Governmental or other public authorities	Credit Bureaus	Employer or Plan Sponsor	Agents or financial professionals
Personal Identifiers	X	X	X	X	X	X
Personal Data	X	X	X	X	X	X
Protected Class Information	X	X	X		X	X
Transaction Information	X	X	X		X	X
Biometric Information	X	X	X		X	
Online Use of Information	X	X	X		X	
Geolocation Information	X	X	X			

Audio/Video Data	X	X	X		X	
Employment Information	X	X	X			X
Education Information	X	X	X			

The purposes for which we disclose personal information depend on our relationship or interaction with a specific California resident. We disclose for the purposes below:

- to operate, manage, and maintain our business;
- to provide our products and services;
- for employment purposes;
- to confirm the accuracy of data received; and
- as directed by the individual the personal information is about or with their consent.

Additionally, as a financial services company, we may also receive requests for information from regulatory authorities, our auditors, and/or our legal advisors. If requested from such parties, we would share your personal information as appropriate.

Retention and Protection of Personal Information

We retain personal information, in accordance with our record retention policies and for as long as needed based on the purpose(s) for which it was obtained and consistent with applicable law. The criteria used to determine our retention periods include:

- the length of time we have an ongoing relationship with you and provide you with the products and services you request;
- whether there is a legal obligation we are subject to (for example, certain laws require us to keep records of certain transactions for a certain period of time before we can delete them);
- if there is a contractual obligation we are subject to; or
- whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations).

The same personal information about you may be used for more than one purpose, each of which may be subject to different retention periods based on the factors listed above.

Rights of California Residents under CCPA

If you are a California resident, you may request that we disclose what personal information we have about you and what we did with that information, to delete your personal information, to direct us not to sell or share your personal information, to correct inaccurate information that we have about you, and to limit our use and disclosure of your personal information.

Requests Not to Sell or Share Personal Information (Right to Opt-Out of Sale or Sharing)

You may request that we stop selling or sharing your personal information (“opt-out”), including via a user-enabled global privacy control. We cannot sell or share your personal information after we receive your opt-out request unless you later authorize us to do so again.

Requests to Know Personal Information (Right to Know)

You may request that we disclose to you personal information we have collected, used and shared about you, and why we collected, used and shared that information. Specifically, you may request that we disclose:

- The categories of personal information collected
- Specific pieces of personal information collected
- The categories of sources from which we collected personal information

- The purposes for which we use the personal information
- The categories of third parties with whom we disclose the personal information
- The categories of information that we disclose to third parties

Requests to Delete Personal Information (Right to Delete)

You may request that we delete personal information we collected from you and to notify our service providers to do the same. However, there are exceptions that would allow us to keep your personal information, such as a legal exemption or where the information is required to fulfill a legal obligation, is necessary to exercise or defend legal claims, or where we are required or permitted to retain the information by law. For example, we cannot delete information about you while continuing to provide you with the products or services or where required to be retained for regulatory purposes.

Requests to Correct Personal Information (Right to Correct)

You may request that we correct inaccurate personal information that we maintain about you. We must verify your identity before completing your request. We may also deny a request to correct if we determine that the contested personal information is more likely than not accurate based on the totality of the circumstances.

Requests to Limit Use of Personal Information (Right to Limit)

You can direct us to only use your sensitive personal information (e.g., your social security number, financial account information, your precise geolocation data, or your genetic data) for limited purposes, such as providing you with the services you requested.

You also have the right to be notified, before or at the point that we collect your personal information, of the types of personal information we are collecting and what we may do with that information.

Right to Non-Discrimination

We cannot deny services, charge you a different price, or provide a different level or quality of services just because you exercised your rights under the CCPA. However, if you refuse to provide your personal information to us or ask us to delete or stop selling your personal information, and that personal information or sale is necessary for us to provide you with services, we may not be able to complete that transaction.

How to Submit Your Request to Know

You may request to exercise your privacy rights for the personal information we collected about you by contacting us via email at privacy@stockbridge.com or by calling 415-658-3300.

For certain privacy rights requests, we must verify that you are who you say you are. You will be asked certain questions to verify your identity. Information collected for purposes of verifying your request will only be used for verification and to respond to your personal information request.

Requests by Authorized Agents

You may authorize another person to submit a request on your behalf. You may also authorize a business entity registered with the California Secretary of State to submit a request on your behalf.

Please note that if you use an authorized agent, we may require more information from either the authorized agent or from you to verify that you are the person directing the agent. For example, for requests to know or delete your personal information, we may require the authorized agent to provide proof that you gave that agent signed permission to submit the request. We may also require you to verify your identity directly with us or directly confirm with us that you gave the authorized agent permission to submit the request.

Denying Requests

There are some exceptions to the opt-out right. Common reasons why we may refuse to stop selling your personal information include:

- Sale or sharing is necessary for us to comply with legal obligations, exercise legal claims or rights, or defend legal claims
- The information is publicly available information, certain medical information, consumer credit reporting information, or other types of information exempt from the CCPA
- We cannot verify your identity or confirm that the personal information that we maintain relates to you
- We cannot verify that you have the authority to make a request on behalf of another individual

Changes to this California Resident Privacy Notice

We reserve the right to change or update this California Resident Privacy Notice as necessary or required. We will post any revision of this California Resident Privacy Notice on this page with a new “Last Updated” date.

Contact Us

If you have any questions or concerns regarding this California Resident Privacy Notice or our collection, use and disclosure of personal information, please contact us at privacy@stockbridge.com or by mail at:

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