

## California Consumer Privacy Act Notice at Collection for California Applicants and Employees

Effective Date: March 11, 2024

### Introduction

**Purpose:** This Notice at Collection for California Applicants and Employees (“Notice”) applies solely to applicants and employees who reside in the State of California (“you”). LGT Capital Partners (USA) Inc. (the “Company”) adopts this Notice to comply with the California Consumer Privacy Act (“CCPA”).

**Scope:** The Company collects and uses for human resources, employment, benefits administration, health and safety, and business-related purposes and to be in legal compliance the following categories of information that identifies, relates to, describes, references, or is capable of being associated with or could reasonably be linked, directly or indirectly, with a particular consumer (“Personal Information”). Below are the categories of Personal Information that we collect and the purposes for which we intend to use this Personal Information:

### Employee Data Processing

**Respect for Employee Privacy:** For any processing of employee personal data, we will consider:

- Whether the processing activity is necessary
- The applicable legal basis for the processing
- Whether the proposed processing of personal data is fair to the employee
- Whether the processing activity is proportionate to the concerns raised

Further, we will ensure that the processing activity is transparent.

**Personal information we collect:** We collect a range of personal information about employees for our legitimate business purposes and in accordance with applicable data protection laws.

Collected information may include:

Category of Information Collected	Examples
Personal Identifiers	Name, address, date of birth, email, phone number, social security number, driver’s license number, passport number, immigration status and documentation.
Personal Information	Name, address, date of birth, email, phone number, social security number, driver’s license number, passport number, employment history, signature, education, bank account number and other financial information, tax information, withholdings, health insurance information.
Characteristics of Protected Classes	Race, ethnic origin, citizenship, marital status, gender, veteran or military status, next of kin contact details as above plus relationship to the employee.
Employment Information	Resumes and cover letters, employment history, references, offer letter, employment contract,

	payroll (salary, bonuses, etc.), maternity leave and maternal leave records, paternity leave and paternal leave records, delivery of contractual benefits, lists of dependents, sick leave records, return to work interviews, vaccination records and related materials, disability records, assessments, performance plans, disciplinary proceedings and decisions.
Internet or other similar network activity	Browsing history, login information, IP addresses, search history, information on a consumer’s interaction with a website, application, or advertisement, or electronic communication (chat or email).

**Sensitive Personal Data:** Subject to the relevant jurisdictional requirements, LGT may process sensitive personal information. LGT will only use and disclose sensitive personal data for a purpose for which it was originally collected. Unless we request it, we ask that you not send us, or disclose, any sensitive personal data.

The sensitive data that LGT processes may include:

- A social security, driver’s license, state identification card, or passport number.
- The contents of an individual’s mail, email, and text messages unless the business is the intended recipient of the communication.
- Information related to racial, ethnic origin, political opinions, religious or philosophical beliefs, or union membership.
- An account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.
- The contents of an individual’s mail, email, and text messages unless the business is the intended recipient of the communication.

**Selling and Sharing of Personal Information:** LGT Capital Partners does not sell your personal data or share your personal data for the purpose of cross context behavioral advertising, as defined by the California Privacy Rights Act (CPRA) of 2020.

**Purpose of Data Collection and Processing:** We process your personal data for our normal business purposes as an employer, which may include:

- Recruitment and fulfilling of any employment contract
- Financial matters, including payroll, benefits and LGT managed assets
- Management, planning, and organization of work
- Managing the employment lifecycle including onboarding, training, surveys, termination of the employment relationship, off-boarding and references for ex-employees
- Equality and diversity in the workplace

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- Health and safety at work
- Safeguarding employees, dealing with emergencies and health matters, for example sick leave and sick pay and accommodations at the workplace
- Safeguarding our business interests, including our intellectual property and confidential information, and the security, availability and resilience of our premises, information systems and technology
- Investigations, claims, grievances, disciplinary proceedings, and defending or pursuing legal claims

**Retention:** In general, we will retain your Data for a period of up to ten years from the point where your contract with LGT Capital Partners has been terminated. As the exact duration of the retention period depends on various elements including applicable laws, regulations or other circumstances (e.g. pension plans), longer retention periods may be applicable in certain cases. Furthermore, possible legitimate interests of LGT Capital Partners may allow us to use your Data for a period exceeding the abovementioned term, particularly where our continued use of your Data is necessary for the establishment, exercise or defense of legal claims.

**How We Collect Your Data:** We collect this information from you through various means. For example, when you give us your CV, complete employment paperwork, or undergo a background check.

We also may collect your personal information from other sources, such as other non-affiliated companies. Non-affiliates are companies not related to us by common ownership or control and can include recruiting agencies and background check providers.

## Sharing of Your Personal Data

Personal Information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Within the last twelve (12) months, we have disclosed each of the following categories of personal information collected with third-party service providers and affiliates as set forth in "Disclosure of Information" in this Privacy Notice, and we collect personal information from the sources set forth in "How We Gather Your Personal Information" in this Privacy Notice.

Category of Information Collected	Category of External Recipients
Personal Identifiers	Administrators, accountants, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents, affiliates for data processing or storage purposes.
Personal Information	Administrators, accountants, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents, affiliates for data processing or storage purposes.
Characteristics of Protected Classes	Administrators, accountants, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents, affiliates for data processing or storage purposes.
Employment Information	Administrators, accountants, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents, affiliates for data processing or storage purposes.
Internet or other similar network activity	Administrators, accountants, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents, affiliates for data processing or storage purposes.

**Your Rights:** You have certain rights under the CCPA/CPRA in respect of the personal information we hold and which you may exercise. These rights are:

*Deletion Rights:* You have the right to request that we delete any of your personal information that we retain, subject to certain exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations.

*Disclosure and Access Rights:* You have the right to request that we disclose to you certain information regarding our collection, use, disclosure and sale of personal information specific to you over the last twelve (12) months. Such information includes:

- The categories of personal information we collected about you;
- The categories of sources from which the personal information is collected;
- Our business or commercial purpose for collecting such personal information;
- Categories of third parties or persons with whom we share the personal information;
- The specific pieces of personal information we have collected about you; and
- Whether we disclosed your personal information to a third party, and if so, the categories of personal information that each recipient obtained.

*Additional Rights:* Under CCPA/CPRA, you also have the right to:

- Request the correction of any inaccurate personal information maintained by us about you.

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- Request that we limit the use and disclosure of your sensitive personal information. Currently, however, we do not use or disclose your sensitive personal information other than for the purpose(s) for which it was collected.
- Choose to opt-out of the sale of personal information or the sharing of personal information for cross-context behavioral advertising. Currently, however, we do not sell or share personal information as defined under the CCPA/CPRA.

Your rights will in each case be subject to the restrictions set out in the CCPA/CPRA. Further information on these rights, and the circumstances in which they may arise in connection with our processing of your personal data, can be obtained by contacting us.

**Non-Discrimination for Exercising Your Rights:** We follow the requirements of California Civil Code §1798.125 and will not discriminate against any consumer who exercises the rights set forth in this privacy notice.

**Verifying Your Identity:** If you choose to contact us with a request, you will need to provide us with identifying information that matches the PII we currently have about you.

**Authorized Agent:** You have the right to appoint an authorized agent to exercise your rights on your behalf. If you would like to do so, please contact LGT at [ccpainfo@lgtcp.com](mailto:ccpainfo@lgtcp.com).

If you have any questions about this Notice or need to access this Notice in an alternative format due to having a disability, please contact LGT at [ccpainfo@lgtcp.com](mailto:ccpainfo@lgtcp.com) or 1-833-849-7743.