

# California Resident Personnel Privacy Notice

This California Resident Personnel Privacy Notice ("California Privacy Notice") is only applicable to California residents. It is delivered on behalf of Brandes Investment Partners, L.P. ("Brandes", "we", "our", or "us"), being the entity for which you work or which is proposing to have a working relationship with you on the date that you receive this document.

We have adopted this California Privacy Notice to comply with the California Consumer Privacy Act, Cal. Civ. Code §§ 1798.100 et seq. ("CCPA"). Please take the time to read and understand this California Privacy Notice.

## Scope

This California Privacy Notice applies solely to our employees, officers, owners, directors and contractors, such as consultants, agency workers, and interns who are residents of the State of California. Please take the time to read and understand this privacy notice.

There is other personal information that this California Privacy Notice does not cover. In some cases, that personal information may not be subject to the CCPA. In other cases, a different privacy notice may apply. Accordingly, this California Privacy Notice and/or the California privacy rights set out herein may not apply to you or to all of your personal information.

By **personal information** we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual, which includes "personal information" and "sensitive personal information" as those terms are defined in the CCPA. The following is not personal information for purposes of the CCPA: (i) "publicly available information"; (ii) lawfully obtained, truthful information that is a matter of public concern; (iii) "deidentified" consumer information about California residents; and (iv) "aggregate" consumer information about California residents (in each case, as those terms are used in the CCPA). This California Privacy Notice does not apply to such information.

## Notice at Collection

The following table sets forth the categories of personal information we may collect from you as a business; the purposes for which we use it; and whether we "sell" or "share" it for purposes of the CCPA (as those terms are used in the CCPA). Our collection, use and disclosure of personal information depends on your relationship with us and your interaction with us.

Category of Personal Information	Purpose for Collecting the Personal Information	Whether We "Share" the Category of Personal Information for Cross-Context Behavioral Advertising	Whether we "Sell" the Category of Personal Information
<b>Identifiers and Categories of Personal Information Under Cal. Civ. Code 1798.80(e), such as name, unique personal identifier, online identifier, account name, phone number, signature, education, or employment</b>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To communicate with you when you are not in the office or to contact you or your next of kin or emergency contact in connection with an emergency</li> <li>• To send you equipment, supplies or professional awards and employee gifts when you are working remotely or are not in the office</li> <li>• To make recruitment decisions and to verify details provided during the recruitment process, as well as to monitor and evaluate staff performance and assist with decisions regarding salary increase, incentive awards and promotions</li> <li>• To enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedures</li> <li>• To ensure devices and work communications are being used in accordance with business needs as well as for security and risk management purposes</li> <li>• To carry out our day-to-day business and promote our business to clients and prospective clients</li> <li>• To carry out diversity and equal opportunities monitoring</li> <li>• In the context of the possible sale or restructuring of all or part of our business</li> <li>• To provide information to government and other authorities or as otherwise permitted or required by law</li> </ul>	No	No
<b>Characteristics of Protected Classifications Under California or federal law, such as race, ethnic origin, citizenship, nationality, gender, gender identity, sexual orientation, disability, and veteran status</b>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To carry out diversity and equal opportunities monitoring</li> <li>• To provide information to government and other authorities or as otherwise permitted or required by law</li> </ul>	No	No

Category of Personal Information	Purpose for Collecting the Personal Information	Whether We "Share" the Category of Personal Information for Cross-Context Behavioral Advertising	Whether we "Sell" the Category of Personal Information
<b>Internet or other electronic network activity information, such as browsing history, search history or information regarding interaction with a website, app or advertisement</b>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To communicate with you when you are not in the office or to contact you or your next of kin or emergency contact in connection with an emergency</li> <li>• To enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedures</li> <li>• To ensure devices and work communications are being used in accordance with business needs as well as for security and risk management purposes</li> <li>• In the context of the possible sale or restructuring of all or part of our business</li> </ul>	No	No
<b>Geolocation data, such as the state or country associated with an IP address, or home address</b>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To communicate with you when you are not in the office or to contact you or your next of kin or emergency contact in connection with an emergency</li> <li>• To send you equipment, supplies or professional awards and employee gifts when you are working remotely or are not in the office</li> <li>• To make recruitment decisions and to verify details provided during the recruitment process, as well as to monitor and evaluate staff performance and assist with decisions regarding salary increase, incentive awards and promotions</li> <li>• To enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedures</li> <li>• To ensure devices and work communications are being used in accordance with business needs as well as for security and risk management purposes</li> <li>• To carry out our day-to-day business and promote our business to clients and prospective clients</li> <li>• In the context of the possible sale or restructuring of all or part of our business</li> <li>• To provide information to government and other authorities or as otherwise permitted or required by law.</li> </ul>	No	No

Category of Personal Information	Purpose for Collecting the Personal Information	Whether We "Share" the Category of Personal Information for Cross-Context Behavioral Advertising	Whether we "Sell" the Category of Personal Information
<b>Audio, electronic, visual, thermal, olfactory or similar information</b> , such as a voice recording, photo or video	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To communicate with you when you are not in the office or to contact you or your next of kin or emergency contact in connection with an emergency</li> <li>• To monitor the security of our offices</li> <li>• [To enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedures]</li> <li>• To ensure devices and work communications are being used in accordance with business needs as well as for security and risk management purposes</li> <li>• To carry out our day-to-day business and promote our business to clients and prospective clients</li> <li>• In the context of the possible sale or restructuring of all or part of our business</li> </ul>	No	No
<b>Professional or employment information</b> , such as job title, current or former employer, employment history, education and qualification details	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To communicate with you when you are not in the office or to contact you or your next of kin or emergency contact in connection with an emergency</li> <li>• To make recruitment decisions and to verify details provided during the recruitment process, as well as to monitor and evaluate staff performance and assist with decisions regarding salary increase, incentive awards and promotions</li> <li>• To carry out our day-to-day business and promote our business to clients and prospective clients</li> <li>• In the context of the possible sale or restructuring of all or part of our business</li> </ul>	No	No

Category of Personal Information	Purpose for Collecting the Personal Information	Whether We "Share" the Category of Personal Information for Cross-Context Behavioral Advertising	Whether we "Sell" the Category of Personal Information
<b>Inferences drawn from personal information to create a profile about a California resident reflecting their preferences, characteristics and other attributes</b>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To communicate with you when you are not in the office or to contact you or your next of kin or emergency contact in connection with an emergency</li> <li>• To send you equipment, supplies or professional awards and employee gifts when you are working remotely or are not in the office</li> <li>• To make recruitment decisions and to verify details provided during the recruitment process, as well as to monitor and evaluate staff performance and assist with decisions regarding salary increase, incentive awards and promotions</li> <li>• To enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedures</li> <li>• To ensure devices and work communications are being used in accordance with business needs as well as for security and risk management purposes</li> <li>• To carry out diversity and equal opportunities monitoring</li> <li>• To carry out our day-to-day business and promote our business to clients and prospective clients</li> <li>• In the context of the possible sale or restructuring of all or part of our business</li> <li>• To provide information to government and other authorities or as otherwise permitted or required by law.</li> </ul>	No	No
<b>Sensitive personal information</b> , such as social security number, driver's license, state identification card or passport number	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> </ul>	No	No

Category of Personal Information	Purpose for Collecting the Personal Information	Whether We "Share" the Category of Personal Information for Cross-Context Behavioral Advertising	Whether we "Sell" the Category of Personal Information
<b>Sensitive personal information</b> , such as trading account information	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> </ul>	No	No
<b>Sensitive personal information</b> , such as racial or ethnic origin, religious or philosophical beliefs or union membership	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To carry out diversity and equal opportunities monitoring</li> </ul>	No	No
<b>Sensitive personal information</b> , such as contents of mail, email, and/or text messages	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedures</li> <li>• To ensure devices and work communications are being used in accordance with business needs as well as for security and risk management purposes</li> </ul>	No	No
<b>Sensitive personal information collected and analyzed concerning sexual orientation</b> , such as self-identification status as LGBTQ	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To carry out diversity and equal opportunities monitoring</li> </ul>	No	No

We do not "share" or "sell" your personal information collected pursuant to this California Notice as such terms are used in the CCPA.

### **Third Party Processing:**

We may receive personal information about you from other sources, such as:

- personal information (including health information) which we receive from third party providers who carry out occupational health or medical assessments; and
- background check and credit report information, including information about criminal convictions, from third party references that you provide to us, from your previous employers, opinions expressed by others about you and from third party background checking services or a previous employer or other references.

This information may be stored and processed by us in the following ways and for the following purposes:

- To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us;
- To communicate with you when you are not in the office or to contact you or your next of kin or emergency contact in connection with an emergency;
- To make recruitment decisions and to verify details provided during the recruitment process, as well as to monitor and evaluate staff performance and assist with decisions regarding salary increase, incentive awards and promotions;
- To enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedure
- To ensure devices and work communications are being used in accordance with business needs as well as for security and risk management purposes;
- To carry out our day-to-day business and promote our business to clients and prospective clients;
- To carry out diversity and equal opportunities monitoring;
- In the context of the possible sale or restructuring of all or part of our business; and
- To provide information to government and other authorities or as otherwise permitted or required by law.

**Data Retention:** We will retain your personal information for as long as necessary to fulfil the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements. To determine the appropriate retention period for your personal information and sensitive personal information, we will consider the amount, nature and sensitivity of the personal information, the potential risk from unauthorized use or disclosure, the purposes for which we process it and whether we can achieve those purposes through other means, and applicable legal requirements.

### **Prior Collection, Use and Disclosure of Personal Information**

The CCPA requires us to give you specific information about the categories of personal information and sensitive personal information we collect about you, the sources from which we have obtained that information, the purposes for which we collect it and the categories of entities to whom we disclose it. Our relevant practices over the last twelve months are described below.

Category of Personal Information	Categories of Sources From Which Collected	Business or Commercial Purpose for Collecting PI	Categories of Third Parties and Other Entities With Whom We May Disclose
<b>Identifiers and Categories of Personal Information Under Cal. Civ. Code 1798.80(e), such as name, unique personal identifier, online identifier, account name, phone number, signature, education, or employment</b>	<ul style="list-style-type: none"> <li>• Directly from you when you provide it to us or one of our affiliates</li> <li>• Via our service providers or partners who act on our behalf</li> <li>• We may collect or generate information about you, such as during the course of your working relationship</li> <li>• From our affiliates</li> <li>• From third party providers, such as those that carry out compliance monitoring activities</li> </ul>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To communicate with you when you are not in the office or to contact you or your next of kin or emergency contact in connection with an emergency</li> <li>• To send you equipment, supplies or professional awards and employee gifts when you are working remotely or are not in the office</li> <li>• To make recruitment decisions and to verify details provided during the recruitment process, as well as to monitor and evaluate staff performance and assist with decisions regarding salary increase, incentive awards and promotions</li> <li>• To enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedures</li> <li>• To ensure devices and work communications are being used in accordance with business needs as well as for security and risk management purposes</li> <li>• To carry out our day-to-day business and promote our business to clients and prospective clients</li> <li>• To carry out diversity and equal opportunities monitoring</li> <li>• In the context of the possible sale or restructuring of all or part of our business</li> <li>• To provide information to government and other authorities or as otherwise permitted or required by law</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers and business partners</li> <li>• Legal authorities as required by law or to protect our rights</li> <li>• Affiliated and non-affiliated third parties as may be permitted by law (such as in connection with the sale or restructuring of all or part of our business)</li> </ul>
<b>Characteristics of Protected Classifications Under California or federal law, such as race, ethnic origin, citizenship, nationality, gender, gender identity, sexual orientation, disability, and veteran status</b>	<ul style="list-style-type: none"> <li>• Directly from you when you provide it to us or one of our affiliates</li> <li>• Via our service providers or partners who act on our behalf</li> <li>• We may collect or generate information about you, such as during the course of your working relationship</li> <li>• From our affiliates</li> </ul>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To carry out diversity and equal opportunities monitoring</li> <li>• To provide information to government and other authorities or as otherwise permitted or required by law</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers and business partners</li> <li>• Legal authorities as required by law or to protect our rights</li> <li>• Affiliated and non-affiliated third parties as may be permitted by law (such as in connection with the sale or restructuring of all or part of our business)</li> </ul>

Category of Personal Information	Categories of Sources From Which Collected	Business or Commercial Purpose for Collecting PI	Categories of Third Parties and Other Entities With Whom We May Disclose
<b>Internet or other electronic network activity information</b> , such as browsing history, search history or information regarding interaction with a website, app or advertisement	<ul style="list-style-type: none"> <li>• Directly from you when you provide it to us or one of our affiliates</li> <li>• Via our service providers or partners who act on our behalf</li> <li>• We may collect or generate information about you, such as during the course of your working relationship</li> <li>• From our affiliates</li> <li>• From third party providers, such as those that carry out compliance monitoring activities</li> </ul>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To communicate with you when you are not in the office or to contact you or your next of kin or emergency contact in connection with an emergency</li> <li>• To enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedures</li> <li>• To ensure devices and work communications are being used in accordance with business needs as well as for security and risk management purposes</li> <li>• In the context of the possible sale or restructuring of all or part of our business</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers and business partners</li> <li>• Legal authorities as required by law or to protect our rights</li> <li>• Affiliated and non-affiliated third parties as may be permitted by law (such as in connection with the sale or restructuring of all or part of our business)</li> </ul>

Category of Personal Information	Categories of Sources From Which Collected	Business or Commercial Purpose for Collecting PI	Categories of Third Parties and Other Entities With Whom We May Disclose
<b>Geolocation data</b> , such as the state or country associated with an IP address, or home address	<ul style="list-style-type: none"> <li>• Directly from you when you provide it to us or one of our affiliates</li> <li>• Via our service providers or partners who act on our behalf</li> <li>• We may collect or generate information about you, such as during the course of your working relationship</li> <li>• From our affiliates</li> <li>• From third party providers, such as those that carry out compliance monitoring activities</li> </ul>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To communicate with you when you are not in the office or to contact you or your next of kin or emergency contact in connection with an emergency</li> <li>• To send you equipment, supplies or professional awards and employee gifts when you are working remotely or are not in the office</li> <li>• To make recruitment decisions and to verify details provided during the recruitment process, as well as to monitor and evaluate staff performance and assist with decisions regarding salary increase, incentive awards and promotions</li> <li>• To enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedures</li> <li>• To ensure devices and work communications are being used in accordance with business needs as well as for security and risk management purposes</li> <li>• To carry out our day-to-day business and promote our business to clients and prospective clients</li> <li>• To carry out diversity and equal opportunities monitoring</li> <li>• In the context of the possible sale or restructuring of all or part of our business</li> <li>• To provide information to government and other authorities or as otherwise permitted or required by law</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers and business partners</li> <li>• Legal authorities as required by law or to protect our rights</li> <li>• Affiliated and non-affiliated third parties as may be permitted by law (such as in connection with the sale or restructuring of all or part of our business)</li> </ul>

Category of Personal Information	Categories of Sources From Which Collected	Business or Commercial Purpose for Collecting PI	Categories of Third Parties and Other Entities With Whom We May Disclose
<b>Audio, electronic, visual, thermal, olfactory or similar information</b> , such as a voice recording, photo or video	<ul style="list-style-type: none"> <li>• Directly from you when you provide it to us or one of our affiliates</li> <li>• Via our service providers or partners who act on our behalf</li> <li>• We may collect or generate information about you, such as during the course of your working relationship</li> <li>• From our affiliates</li> </ul>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To communicate with you when you are not in the office or to contact you or your next of kin or emergency contact in connection with an emergency</li> <li>• [To monitor the security of our offices]</li> <li>• [To enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedures]</li> <li>• To ensure devices and work communications are being used in accordance with business needs as well as for security and risk management purposes</li> <li>• To carry out our day-to-day business and promote our business to clients and prospective clients</li> <li>• In the context of the possible sale or restructuring of all or part of our business</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers and business partners</li> <li>• Legal authorities as required by law or to protect our rights</li> <li>• Affiliated and non-affiliated third parties as may be permitted by law (such as in connection with the sale or restructuring of all or part of our business)</li> </ul>
<b>Professional or employment information</b> , such as job title, current or former employer, employment history, education and qualification details	<ul style="list-style-type: none"> <li>• Directly from you when you provide it to us or one of our affiliates</li> <li>• Via our service providers or partners who act on our behalf</li> <li>• We may collect or generate information about you, such as during the course of your working relationship</li> <li>• From our affiliates</li> <li>• From third party providers, such as those that carry out compliance monitoring activities</li> </ul>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To communicate with you when you are not in the office or to contact you or your next of kin or emergency contact in connection with an emergency</li> <li>• To make recruitment decisions and to verify details provided during the recruitment process, as well as to monitor and evaluate staff performance and assist with decisions regarding salary increase, incentive awards and promotions</li> <li>• To carry out our day-to-day business and promote our business to clients and prospective clients</li> <li>• In the context of the possible sale or restructuring of all or part of our business</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers and business partners</li> <li>• Legal authorities as required by law or to protect our rights</li> <li>• Affiliated and non-affiliated third parties as may be permitted by law (such as in connection with the sale or restructuring of all or part of our business)</li> </ul>

Category of Personal Information	Categories of Sources From Which Collected	Business or Commercial Purpose for Collecting PI	Categories of Third Parties and Other Entities With Whom We May Disclose
<b>Inferences drawn from personal information</b> to create a profile about a California resident reflecting their preferences, characteristics and other attributes	<ul style="list-style-type: none"> <li>• Directly from you when you provide it to us or one of our affiliates</li> <li>• Via our service providers or partners who act on our behalf</li> <li>• We may collect or generate information about you, such as during the course of your working relationship</li> <li>• From our affiliates</li> <li>• From third party providers, such as those that carry out compliance monitoring activities</li> </ul>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To communicate with you when you are not in the office or to contact you or your next of kin or emergency contact in connection with an emergency</li> <li>• To send you equipment, supplies or professional awards and employee gifts when you are working remotely or are not in the office</li> <li>• To make recruitment decisions and to verify details provided during the recruitment process, as well as to monitor and evaluate staff performance and assist with decisions regarding salary increase, incentive awards and promotions</li> <li>• To enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedures</li> <li>• To ensure devices and work communications are being used in accordance with business needs as well as for security and risk management purposes</li> <li>• To carry out our day-to-day business and promote our business to clients and prospective clients</li> <li>• In the context of the possible sale or restructuring of all or part of our business</li> <li>• To provide information to government and other authorities or as otherwise permitted or required by law.</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers and business partners</li> <li>• Legal authorities as required by law or to protect our rights</li> <li>• Affiliated and non-affiliated third parties as may be permitted by law (such as in connection with the sale or restructuring of all or part of our business)</li> </ul>
<b>Sensitive personal information</b> , such as social security number, driver's license, state identification card, passport number, or citizenship and/or immigration status	<ul style="list-style-type: none"> <li>• Directly from you when you provide it to us or one of our affiliates</li> <li>• Via our service providers or partners who act on our behalf</li> <li>• We may collect or generate information about you, such as during the course of your working relationship</li> <li>• From our affiliates</li> </ul>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers and business partners</li> <li>• Legal authorities as required by law or to protect our rights</li> <li>• Affiliated and non-affiliated third parties as may be permitted by law (such as in connection with the sale or restructuring of all or part of our business)</li> </ul>

Category of Personal Information	Categories of Sources From Which Collected	Business or Commercial Purpose for Collecting PI	Categories of Third Parties and Other Entities With Whom We May Disclose
<b>Sensitive personal information</b> , such as trading account information	<ul style="list-style-type: none"> <li>• Directly from you when you provide it to us or one of our affiliates</li> <li>• Via our service providers or partners who act on our behalf</li> <li>• We may collect or generate information about you, such as during the course of your working relationship</li> <li>• From our affiliates</li> <li>• From third party providers, such as those that carry out compliance monitoring activities</li> </ul>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers and business partners</li> <li>• Legal authorities as required by law or to protect our rights</li> <li>• Affiliated and non-affiliated third parties as may be permitted by law (such as in connection with the sale or restructuring of all or part of our business)</li> </ul>
<b>Sensitive personal information</b> , such as racial or ethnic origin, religious or philosophical beliefs or union membership	<ul style="list-style-type: none"> <li>• Directly from you when you provide it to us or one of our affiliates</li> <li>• Via our service providers or partners who act on our behalf</li> <li>• From our affiliates</li> </ul>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To carry out diversity and equal opportunities monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers and business partners</li> <li>• Legal authorities as required by law or to protect our rights</li> <li>• Affiliated and non-affiliated third parties as may be permitted by law (such as in connection with the sale or restructuring of all or part of our business)</li> </ul>

Category of Personal Information	Categories of Sources From Which Collected	Business or Commercial Purpose for Collecting PI	Categories of Third Parties and Other Entities With Whom We May Disclose
<b>Sensitive personal information</b> , such as contents of mail, email, and/or text messages	<ul style="list-style-type: none"> <li>• Directly from you when you provide it to us or one of our affiliates</li> <li>• Via our service providers or partners who act on our behalf</li> <li>• We may collect or generate information about you, such as during the course of your working relationship</li> <li>• From our affiliates</li> <li>• From third party providers, such as those that carry out compliance monitoring activities</li> </ul>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To enable the effective operation of the email system and ensure that it is used in accordance with our policies and procedures</li> <li>• To ensure devices and work communications are being used in accordance with business needs as well as for security and risk management purposes</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers and business partners</li> <li>• Legal authorities as required by law or to protect our rights</li> <li>• Affiliated and non-affiliated third parties as may be permitted by law (such as in connection with the sale or restructuring of all or part of our business)</li> </ul>
<b>Sensitive personal information</b> , such as personal information collected and analyzed concerning sexual orientation, such as self-identification status as LGBTQ	<ul style="list-style-type: none"> <li>• Directly from you when you provide it to us or one of our affiliates</li> <li>• Via our service providers or partners who act on our behalf</li> <li>• From our affiliates</li> </ul>	<ul style="list-style-type: none"> <li>• To meet our legal and regulatory obligations, and perform our obligations and exercise our rights under your working relationship with us</li> <li>• To carry out diversity and equal opportunities monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• Service providers and business partners</li> <li>• Legal authorities as required by law or to protect our rights</li> <li>• Affiliated and non-affiliated third parties as may be permitted by law (such as in connection with the sale or restructuring of all or part of our business)</li> </ul>

## How We Disclose Personal Information

In the past twelve months, we have disclosed the following categories of personal information for business purposes as set out above:

- Identifiers
- Categories of Personal Information described in Cal. Civ. Code Section 1798.80(e)
- Characteristics of Protected Classifications Under California or Federal Law
- Internet or other electronic network activity information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory or similar information
- Professional or employment information
- Inferences drawn from other personal information
- Sensitive personal information, such as social security number, driver's license, state identification card, passport number or citizenship and/or immigration status; racial or ethnic origin, religious or philosophical beliefs or union membership; and personal information collected and analyzed concerning your sexual orientation

## We Do Not Sell or “Share” Your Personal Information for Purposes of the CCPA

We do not “sell” your personal information for purposes of the CCPA or “share” it for purposes of cross-context behavioral advertising (as those terms are defined in the CCPA) and have not done so in the past twelve months.

## Minors Under the Age of 16

We do not have actual knowledge that we sell or share the personal information of minors under the age of 16.

## Your Rights as a California Resident

As a California resident, you may have certain rights in relation to your personal information.

### Right to Know

You may have the **right to know** how we have collected, used and disclosed your personal information. Specifically, you may have the right to know::

- The categories of personal information we have collected about you.
- The categories of sources from which we have collected your personal information.
- The business or commercial purpose for which we collect, sell or share your personal information.
- The categories of third parties to whom we have disclosed your personal information.
- The categories of personal information that we have sold or shared about you and the categories of third parties to whom it was sold or shared.
- The categories of personal information we have disclosed about you for a business purpose and the categories of persons to whom we have disclosed it.

In addition, you may have the **right to know the specific pieces of personal information** we have collected about you. Subject to certain limitations, you may request that we provide this information dating back to January 1, 2022.

### Right to Make a Deletion Request

You may have the right to request that we delete your personal information that we have collected or received. Subject to certain exceptions, we must delete your personal information and direct our service providers and contractors to delete your personal information.

## Right to Correct Inaccurate Personal Information

You may have the right to request that we correct inaccurate personal information about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

## Right to Opt-Out of Sales of Personal Information

If we were to sell your personal information for purposes of the CCPA, you may have the right to opt-out of the sale of your personal information.

## Right to Opt-Out of Sharing of Personal Information

If we were to share your personal information for cross-context behavioral advertising purposes for purposes of the CCPA, you may have the right to opt-out of that sharing.

## Right to Limit Use and Disclosure of Sensitive Personal Information

Subject to certain exceptions, you may have the right to limit our use and disclosure of your sensitive personal information. We do not use or disclose your sensitive personal information in a manner that gives rise to this right.

## Right to Non-Discrimination

You have the right not to be discriminated against by us for choosing to exercise your rights under the CCPA..

## How to Exercise Your California Privacy Rights

If you wish to **exercise your right to know, delete or correct inaccuracies in your personal information, or your right to limit our use and disclosure of your sensitive personal information**, please submit a request to us by [clicking here](#), calling us at 1-800-237-7119 or contacting us at [hresource@brandes.com](mailto:hresource@brandes.com). If you maintain an account with us, we may require you to submit a request through that account.

You can authorize a person ("Authorized Agent") registered with the California Secretary of State to exercise your California privacy rights on your behalf. An Authorized Agent can also include a person who has power of attorney or is acting as a conservator. To submit a request to Brandes on behalf of another person as an Authorized Agent, please call 1-800-237-7119 or contact us at [hresource@brandes.com](mailto:hresource@brandes.com).

## Verifying Your Requests

We only respond to your requests to know how we have collected, used and disclosed your personal information, access the specific pieces of personal information we have about you, delete your personal information or correct inaccurate personal information when we can verify that you are a California resident exercising your rights regarding your personal information.

We may need to ask you for personal information to verify your request so we can match it to the personal information we already have about you. We may also need to obtain additional information about you that we do not already have. If you provide us with new personal information that we do not already have about you, we will use it solely for the purpose of verifying your request. We will let you know via email if we need more information from you to verify your request. Please reply to our requests promptly.

We will communicate with you about your requests via email. We will use the email address you provided when submitting your request.

If we cannot verify your identity, we will let you know.

## Responding To Your Requests

We aim to promptly verify and respond to your requests within 45 days of receipt but may require a total of up to 90 days to respond to your requests. If we require additional time beyond the initial 45 days after we receive your request, we will let you know within the first 45 days.

We do not ordinarily charge a fee for our response to your requests. However, we may do so to the extent your request(s) are excessive, repetitive, or manifestly unfounded. If we determine that charging a fee is warranted, we will let you know and will provide you with an estimate of the associated costs of responding to your request(s).

If we determine that we cannot or will not take the action that you requested, we will let you know. We will inform you of our reasons for not taking action and any rights you may have to appeal the decision.

Unless you tell us that you would like to receive a response via postal mail, we will respond to you via email regarding your requests to know and to access the specific pieces of personal information we have about you. We will contact you at the email address you provided when submitting your request(s). If you would like to receive responses to a request to know or access personal information via postal mail rather than email, please let us know when submitting your request(s).

## Limitations

The CCPA does not apply in full to all personal information we collect from California residents. Therefore, even if you are a California resident and submit a verifiable request, we may not be required to comply with your request.

We are only required to respond to certain requests twice in any twelve-month period. We are not required to provide you access to specific pieces of personal information more than twice in any twelve-month period. Similarly, we are not required to comply with your "requests to know" more than twice in any twelve-month period.

## Changes to Our California Privacy Notice

From time to time, Brandes may update or revise this California Privacy Notice. If there are changes to the terms of this California Privacy Notice, documents containing the revised policy on the relevant website(s) will be updated.

## Contacting us

If you would like further information on the collection or use of your personal information, please submit questions, comments and requests by contacting us at [hresource@brandes.com](mailto:hresource@brandes.com).