

VMG PARTNERS II, LLC CALIFORNIA CANDIDATE PRIVACY NOTICE AND POLICY

Last updated: February 28, 2020

1. PURPOSE OF THIS NOTICE

- 1.1 This Notice describes the **Personal Information** (defined below) VMG Partners II, LLC and its affiliates (together, “**VMG Partners**”, “**we**”, “**our**”, “**us**”) receives about you or third parties (such as recruiters or referees) in connection with your job application, how we process it and your rights and obligations in relation to it. This Notice applies to California residents (“**California Candidates**”) whose Personal Information (defined below) is collected by the VMG Partners.

This Notice takes into account the California Consumer Privacy Act of 2018, as amended from time to time (the “**CCPA**”).

VMG Partners may be contacted at the below for all questions relating to this Notice:

E-mail: compliance@vmgpartners.com

Phone: 833-742-0960 (toll free)

Address: 39 Mesa Street, Suite 310, San Francisco, CA 94129

2 SCOPE

- 2.1 This Notice applies to California Employees whose Personal Information (defined below) is collected by VMG Partners.
- 2.2 Under the CCPA, “**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 a particular California Candidate.

3 WHAT PERSONAL INFORMATION DOES VMG PARTNERS COLLECT ABOUT CANDIDATES AND FOR WHAT PURPOSES?

- 3.1 We may receive and use the following Personal Information about you either directly from you, our affiliates or from third parties in connection with your application, such as recruiters, referees, and organizations that provide background checks and we may use it for the following purposes:
- (a) **Information you provide as part of your application.**
- (i) You will provide us information about you to apply for a role or by corresponding with us by phone, e-mail or otherwise. This may include some or all of the following: (i) information such as your name, contact information, ability to work in the country for which you are applying for employment; (ii) contact details such as home and work address, phone numbers, email addresses, emergency contacts and next of kin information; (iii) information with respect to education, professional training and previous career performance including compensation (to the extent permitted by law), qualifications, references, professional licenses or curriculum vitae information; (iv) details of current and historic business interests and directorships, political donations and investments that you may hold; (v) personal and family details, medical and health screening details; and (vi)

information with respect to career commencement and development including date of hire, employee category, and full time or part-time status.

- (ii) We use this information to determine and validate your qualifications and suitability for employment, conduct background checks, communicate with you, and, if you are a successful candidate, to create an employment record.

(b) **Information from third parties.**

- (i) We receive information from third parties in connection with your application, such as referees, recruiters or recruitment platforms and organisations that provide background checks (this will include right to work, criminal, civil and regulatory reference checks, credit history, past work history, educational history, social media and professional licences where applicable). This may also include drug screening, to the extent permitted by applicable law.
- (ii) We use this information to identify and evaluate you for employment positions, and to identify potential conflicts of interest.

4 **DISCLOSURES OF CANDIDATES' PERSONAL INFORMATION**

4.1 We share your information with selected recipients. These categories of recipients include:

- (a) Members of the VMG Partners Group, for the purposes set out in Section 3 (*What Personal Information Does VMG Partners Collect About Candidates and for What Purposes?*) above;
- (b) Email and other IT services providers, including Eze Castle Integration and Global Relay, that provide us with email, archiving, data management, data storage, archiving and general IT support services;
- (c) background check providers, to verify the information that you provided as part of your application;
- (d) human resources information system and payroll services providers including TriNet Group Inc;
- (e) referees identified by you, to identify you and provide a reference; and
- (f) cloud and other data storage providers, to store the Personal Information you provide and for disaster recovery services, as well as destruction of information.
- (g) “**VMG Partners Group**” means VMG Partners and any entity controlled by or under common control with VMG Partners, excluding any Portfolio Companies. “**Portfolio Companies**” means any portfolio companies in which funds affiliated with VMG Partners or any members of the VMG Partners Group are invested or propose to invest.

5 **CHANGES TO THIS NOTICE**

5.1 We may update this Notice from time to time. Any such updated Notice will be made available to successful candidates on the VMG Partners intranet and will be available to unsuccessful candidates on request by email to compliance@vmgpartners.com.