

Last updated: July 1, 2020

## Privacy Notice For California Consumers

This notice contains disclosures required by the California Consumer Privacy Act (“CCPA”), is only relevant to residents of California, and applies only to the collection or other use of “personal information” that is subject to the CCPA.

**Information We Collect.** In the past 12 months, we have collected the following categories of personal information about California consumers:

Category	Examples	Collected
Identifiers	A real name, alias, email address, postal address, Internet Protocol (IP) address, account name, Social Security number, driver’s license number, passport number, or other similar personal identifiers.	YES
Other personal information categories, as listed in the California Customer Records statute	A signature, physical characteristics or description, telephone number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	YES
Protected classification characteristics under California or federal law	Age (40 years or older), race, citizenship, marital status, sex, veteran or military status.	YES
Commercial information	Account activity, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
Biometric information	Fingerprints, faceprints, voiceprints, and iris or retina scans.	YES
Professional or employment-related information	Current or past job history or performance evaluations.	YES
Inferences drawn from other personal information	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

We collect personal information from the following categories of sources:

- Your communications with us;
- Investors or other “customers”;
- Service providers;
- Nonprofit organizations; and
- Government entities.

**Use of Personal Information.** We may use the personal information we collect for one or more of the following purposes:

- Marketing our products;
- Providing performance and other updates;
- One or more of the following business purposes:
  - Performing services (for us or our service provider) such as account servicing, processing orders and payments, and analytics;
  - Auditing related to our interactions with you;
  - Legal compliance;
  - Internal operations;
  - Activities to maintain and improve our services; and
  - Short-term, transient use, provided that the personal information is not disclosed to another third party and is not used to build a profile about a consumer.

**Sharing Personal Information.** We may disclose personal information in one or more of the categories identified above to:

- Service providers, including but not limited to: administrators, lenders, banks, auditors, law firms, consultants, placement agents, employment agencies, credit bureaus;
- Affiliates;
- Business partners;
- Legal or government regulatory authorities as required by applicable law; and
- In connection with a potential business transfer.

In the past 12 months, we have not sold any personal information we collect about you to third parties, and we have shared the categories of personal information we collect about you as set forth above.

**Rights of California Consumers.** The CCPA provides a California consumer the following rights, subject to certain exceptions and limitations:

- The right to request (a) the categories and specific pieces of personal information we collect, use, disclose, and sell about you, (b) the categories of sources from which we collected your personal information, (c) our purposes for collecting or selling your personal information, (d) the categories of your personal information (if any) that we have either sold or disclosed for a business purpose, and (e) the categories of third parties with which we have shared personal information;
- For certain categories of personal information, the right to request a list of what personal information (if any) we disclosed to third parties for their own direct marketing purposes in the past 12 months and the names and addresses of those third parties;
- The right to request that we delete the personal information we have collected from you or maintain about you;
- The right to opt out of our sale(s) (if any) of your personal information; and
- The right not to receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA.

You may submit requests relating to your exercise of rights under the CCPA to us:

via phone **844-999-7728**;

submitting a request online at [www.starboardvalue.com](http://www.starboardvalue.com); or

email: – [info@starboardvalue.com](mailto:info@starboardvalue.com).

We may need to request additional information from you to verify your identity or understand the scope of your request. In verifying requests, we will require you to provide, at a minimum a telephone number or mailing address.<sup>1</sup> If we are unable to verify your identity, we will need to deny your request.

You may designate an authorized agent to make a CCPA request on your behalf by mailing two forms of identification showing your first name, last name, and current address, and a signed authorization allowing an agent to request information on your behalf.

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