

Last updated: March 2023

Privacy Notice For California Consumers

This notice contains disclosures required by the California Privacy Rights Act (“CPRA”), is only relevant to residents of California, and applies only to the collection or other use of “Personal Information” as defined by the CPRA.

Information We Collect. In the past 12 months, we have collected and shared for a business purpose the following categories of Personal Information about California consumers:

Category	Examples	Collected	Shared for Business Purpose
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	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	YES
Protected classification characteristics under California or federal law	Age (40 years or older), race, citizenship, marital status, sex, veteran or military status.	YES	YES
Commercial information	Account activity, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO	NO
Biometric information	Fingerprints, faceprints, voiceprints, and iris or retina scans.	NO	NO
Internet or other similar network activity	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.	NO	NO
Geolocation data	Physical location or movements.	NO	NO
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	YES	YES
Professional or employment-related information	Current or past job history or performance evaluations.	YES	YES
Non-public education information (per the Family Educational Rights and Privacy Act)	Education records directly related to a student maintained by an educational institution or party acting on its behalf.	YES	YES
Inferences drawn from other personal information	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES	YES
Sensitive personal information	A consumer’s SS, driver’s license, state ID card, or passport number; account log-in or debit/credit card number in combination with any access code, password, or account credentials; precise geolocation; racial/ethnic origin, religious/philosophical beliefs, or union membership; contents of mail, email, and text messages; genetic data; biometric information; PHI; or sex life or sexual orientation.	YES	YES

Personal Information does not include information that is publicly available, de-identified/ aggregated, or subject to HIPAA or GLBA.

We collect Personal Information from the following categories of sources:

- Your communications with us;
- Investors or other “customers”;
- Service providers, including, but not limited to: [administrators, lenders, banks, brokers, auditors, law firms, consultants, placement agents, employment agencies, credit bureaus];
- Portfolio companies;

- Nonprofit organizations; and
- Government entities.

We do not knowingly collect, solicit, or sell Personal Information from anyone under the age of 18 without the prior consent of a parent or guardian.

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 or contractor) such as account servicing, processing orders and payments, and analytics;
 - 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.
 - Detecting and protecting against security incidents, fraud, and illegal activity

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;
- Portfolio companies;
- Business partners;
- Legal or government regulatory authorities as required by applicable law;
- In connection with a potential business transfer; and
- Third parties to whom you or your agents authorize us to disclose such information in connection with services we provide to you.

In the past 12 months, we have not sold any Personal Information to third parties.

Length of Time. We will keep your Personal Information for as long as necessary to comply with our regulatory obligations.

Rights of California Consumers. The CPRA 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 business or commercial purposes for collecting, selling, or sharing your Personal Information, (d) the categories of your Personal Information (if any) that we have either sold, shared, 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;
- The right to request we correct any inaccurate Personal Information maintained about you;
- The right to limit our use of your sensitive personal information to only use that is necessary to perform the service expected or provide the goods reasonably expected; and
- The right not to receive discriminatory treatment for exercising your CPRA rights.

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

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

submitting a request online at www.starboardvalue.com; or

email: – info@starboardvalue.com.

You may only make a verifiable request for access or data portability twice within a 12-month period. All verifiable requests must provide (1) enough information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative and (2) sufficient detail that allows us to properly evaluate and respond to it.

We endeavor to respond to a verifiable request within 45 days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

Questions. If you have questions regarding this Notice, please contact us at info@starboardvalue.com.