

CAPSTONE INVESTMENT ADVISORS, LLC

CCPA PRIVACY NOTICE FOR JOB APPLICANTS AND EMPLOYEES

SCOPE AND APPLICATION OF THIS PRIVACY NOTICE

Capstone Investment Advisors, LLC, (“we”, “us” or “our”) is committed to protecting the privacy and security of your personal information. This Privacy Notice for California Employees and Job Applicants applies solely to those who reside in the State of California and are prospective, current and former partners, employees, secondees, contractors, and interns (“**staff members**”).

We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice.

United States Residents Outside CA: Please refer to our Privacy Notice (US) for important information relating to the collection or other use of your personal information.

EU/UK and Hong Kong Residents: Please refer to our Privacy Notice (Non-US) for important information relating to the collection or other use of your personal information, including our compliance with the EU General Data Protection Regulation 2016/679, United Kingdom and Hong Kong privacy laws and regulations.

INFORMATION WE COLLECT

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“personal information”). 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;

- o 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.

In particular, we will collect the following categories of personal information from you:

Category	Examples
Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card 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. Some personal information included in this category may overlap with other categories.
Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans,

	keystroke, gait, or other physical patterns, and sleep, health, or exercise data.
Professional or employment-related information.	Current or past job history or performance evaluations.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, if you agree to provide the information as part of the application process and through your role as an employee, director, officer, or a contractor of Capstone.
- Third-parties. For example, from a reference supplied by you.

USE OF PERSONAL INFORMATION

We may use the personal information we collect for one or more of the following purposes within the context of your role as a job applicant to, an employee of, director of, officer of, or a contractor of Capstone:

- To evaluate you as a possible employee, director, officer, or contractor.
- To manage the performance of job duties.
- To fulfill or meet the reason you provided the information. For example, if you share your bank account number, we will use that information to process your compensation.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To effectively process payroll.
- To administer and maintain employee benefit plans including group health plans, 401(k) plans and other welfare and retirement plans and perquisites.

SHARING PERSONAL INFORMATION

We may share your personal information by disclosing it to a third party for a business purpose. We only make these business purpose disclosures under written contracts that describe the purposes, require the recipient to keep the personal information confidential, and prohibit using the disclosed information for any purpose except performing the contract. In the preceding twelve (12) months, we have disclosed the categories of Personal Information for the business purposes as described in the Use of Personal Information section above. We will disclose Personal Information for a business purpose only to service providers, or, where required by law, or in response to valid legal process compelling disclosure.

However, we do not sell personal information.

YOUR RIGHTS AND CHOICES

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights. Some of these rights do not currently apply to employees.

Right to Know and Data Portability

You may have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive your request and confirm your identity, we may be required to disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
 - sales, identifying the personal information categories that each category of recipient purchased; and
 - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

- The specific pieces of personal information we collected about you (also called a data portability request).

We do not provide a right to know or data portability disclosure for business to business ("B2B") personal information.

Right to Delete

You may have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive your request and confirm your identity, we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
- Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

We will delete or deidentify personal information not subject to one of these exceptions from our records and will direct our service providers to take similar action.

We do not provide these deletion rights for B2B personal information.

Exercising Your Rights to Know or Delete

To exercise your rights to know or delete described above, please submit a request by either:

Calling us at 646-901-5736.

Emailing our Chief Compliance Officer at
Katrina.Paglia@capstoneco.com

Only you, or someone legally authorized to act on your behalf, may make a request to know or delete related to your personal information.

You may only submit a request to know twice within a 12-month period. Your request to know or delete must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

Response Timing and Format

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact our Chief Compliance Officer in by email or phone at the contact information below.

We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales Opt-Out and Opt-In Rights

If you are age 16 or older, you have the right to direct us to not sell your personal information at any time (the "right to opt-out"). We do not sell any personal information of consumers or staff members.

NON-DISCRIMINATION

We will not discriminate against you for exercising your CCPA rights.

CHANGES TO OUR PRIVACY NOTICE

We reserve the right to amend this Privacy Notice at our discretion and at any time. When we make changes to this Privacy Notice, we will post the updated notice and update the notice's effective date.

WHO TO CONTACT ABOUT THIS PRIVACY NOTICE

If you have any questions about this Privacy Notice or requests with regards to the personal data we hold about you, you may contact our Chief Compliance Officer by email (Katrina.Paglia@capstoneco.com) or telephone (+1 646-901-5736) or by writing to 250 Greenwich St. 30th Floor, New York, NY 10007.

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