

## Chandler Asset Management Recruiting Privacy Policy

### Purpose

This Recruiting Privacy Policy describes how **CHANDLER ASSET MANAGEMENT** (“we,” “us,” or “our”) collects, uses, discloses, and retains personal information about applicants in compliance with the California Consumer Privacy Act (CCPA) and the California Privacy Rights Act (CPRA).

### Scope

This policy applies to job applicants who apply for employment through our Human Resources Information System (HRIS), regardless of whether the position is full-time, part-time, temporary, or contract based.

### Categories of Personal Information Collected

Under California law, we may collect the following categories of personal information:

Category	Examples
<b>Identifiers</b>	Full name, email address, mailing address, phone number
<b>Professional or Employment-Related Information</b>	Resume, work history, references, desired salary, work-related licenses, permits, certifications, work authorization status, references, social media
<b>Education Information</b>	Degrees, certifications, transcripts
<b>Internet or Network Activity</b>	IP address, device/browser data when using the HRIS
<b>Sensitive Personal Information</b>	Social Security Number (for background checks), race/ethnicity (if voluntarily disclosed), national origin, gender identity, sex, sexual orientation, disability/veteran status
<b>Inferences</b>	Based on skills assessments or interviews

Any other information you elect to provide to us (e.g., employment preferences, willingness to relocate, and desired salary)

We do **not** sell or share your personal information as defined under CCPA/CPRA.

## **Sources of Information**

We collect personal information from:

- You directly (via applications, forms, or interviews)
- Recruiting platforms (e.g., LinkedIn, job boards)
- Referrals and references
- Background check and assessment providers
- Our internal systems (HRIS, ATS)

## **Purposes for Collection and Use**

We collect and use your personal information to:

- Evaluate qualifications and suitability for employment
- Conduct interviews and assessments
- Perform background checks (with your consent)
- Communicate regarding application status
- Maintain employment applicant records
- Comply with applicable labor and employment laws

## **Accuracy of Information You Provide**

You are responsible for the information you provide and ensuring that it is honest, truthful, accurate, and not misleading in any way.

## **Disclosure of Personal Information**

We may disclose your personal information to:

- Internal HR and hiring teams
- Authorized third-party service providers (e.g., HRIS vendors, recruiters, background check agencies)
- Governmental or legal authorities if required

We enter into contracts with third parties to ensure your data is processed securely and only for authorized purposes.

## **Cookies and Other Tracking Technologies**

Chandler Asset Management ("we," "our," or "us") uses cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy below.

### **1. What Are Cookies?**

Cookies are small text files that are stored on your device when you visit a website. They allow the website to recognize your device and remember certain information about your visit, such as your preferences or login status.

### **2. Types of Cookies We Use**

We use the following categories of cookies on our website:

#### **a. Strictly Necessary Cookies**

These cookies are essential for the operation of our website. They enable core functionality such as page navigation and access to secure areas. Without these cookies, the website cannot function properly.

#### **b. Performance and Analytics Cookies**

These cookies help us understand how visitors interact with our website by collecting information anonymously. We use this data to improve the performance and usability of the site. Tools such as Google Analytics may be used for this purpose.

#### **c. Functional Cookies**

Functional cookies allow the website to remember choices you make (such as your username or region) and provide enhanced features.

#### **d. Targeting or Advertising Cookies**

We do not currently use cookies for targeted advertising. If this changes in the future, we will update this policy accordingly.

### **3. Third-Party Cookies**

Some cookies on our site may be set by third-party services we use to enhance functionality or analytics. These services may collect and process your data

according to their own privacy policies. We encourage you to review their policies for more information.

#### **4. Managing Cookies**

You have the option to control and manage cookies in several ways:

- **Browser Settings:** Most web browsers allow you to refuse or delete cookies via their settings. Note that disabling cookies may affect the functionality of the website.
- **Cookie Banner:** Upon your first visit to our site, you may be prompted with a banner to accept or manage your cookie preferences.
- **Opt-out Tools:** For certain analytics providers like Google, you can use tools such as the Google Analytics Opt-out Browser Add-on.

#### **5. Changes to This Cookie Policy**

We may update this Cookie Policy from time to time. When we do, we will revise the "Effective Date" at the top of this page. We encourage you to periodically review this policy to stay informed.

#### **Retention of Personal Information**

We retain applicant personal information for as long as needed to:

- Fulfill recruitment and legal obligations
- Maintain a record of the hiring process
- Consider you for future roles

Typical retention period: **4 years** unless a shorter or longer retention period is required or permitted by law.

#### **Security Measures**

We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal

information to and from our Sites is at your own risk. You should only access the services within a secure environment.

### California Notice at Collection

Under the California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act of 2020 (“CPRA”), you are entitled to be informed about the following, at or before the point of collection of your personal information:

- The categories of personal information we will collect, the purposes for which those categories of personal information will be collected or used and whether such information will be sold or shared;
- The categories of sensitive personal information to be collected and the purposes for which those categories of sensitive personal information will be collected or used and whether such information is sold or shared; and
- The length of time we intend to retain each category of personal information, including sensitive personal information, or the criteria used to determine such period;

To the extent that we collect your personal information that is subject to the CCPA as amended, that information and our practices are described below. The categories we use to describe the information are those enumerated in the CCPA as amended; categories not listed are not collected. Certain personal information may fall into multiple categories.

Category	Required Information
Identifiers	<i>Name, email address, phone number, contact address, username, password</i>  <u>Source</u> : Directly from you  <u>Purpose of collection and use</u> : All purposes listed in <b>Section 2</b> of the Notice above  <u>Categories of Parties with Whom Chandler is Shared</u> : Affiliates; Service Providers
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	<i>Name, signature, social security number, physical characteristics or description, address, telephone number, passport</i>

	<p><i>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</i></p> <p><u>Source:</u> Directly from you; generated in the course of your use of the Services</p> <p><u>Purpose of collection and use:</u> All purposes listed in <b>Section 2</b> of the Notice above</p> <p><u>Categories of Parties with Whom Chandler is Shared:</u> Affiliates; Service Providers</p>
Protected classification characteristics under California or federal law	<p><i>Age (40 years or older), national origin, marital status, gender, veteran or military status</i></p> <p><u>Source:</u> Directly from you</p> <p><u>Purpose of collection and use:</u> All purposes listed in <b>Section 2</b> of the Notice above</p> <p><u>Categories of Parties with Whom PI is Shared:</u> Affiliates; Service Providers</p>
Internet or other similar network activity	<p><i>Device ID, browsing history, search history, and information regarding your interaction with an internet website, application, or advertisement</i></p> <p><u>Source:</u> Automatically generated when you use the Services</p> <p><u>Purpose of collection and use:</u> All purposes listed in <b>Section 2</b> of the Notice above</p> <p><u>Categories of Parties with Whom PI is Shared:</u> Affiliates; Service Providers</p>

Education information	<p><i>Institutions attended, degrees obtained, and courses taken</i></p> <p><u>Source:</u> Directly from you</p> <p><u>Purpose of collection and use:</u> All purposes listed in <b>Section 2</b> of the Notice above</p> <p><u>Categories of Parties with Whom PI is Shared:</u> Affiliates; Service Providers</p>
Inferences drawn from other information	<p><i>Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes</i></p> <p><u>Source:</u> We do not actively create profiles of the preferences or interests of our employees; however, certain of this information may be collected incidentally about you over the course of your employment, either directly from you or from the individuals you interact with at Paylocity, for instance in performance evaluations.</p> <p><u>Purpose of collection and use:</u> All purposes listed in the Notice above</p> <p><u>Categories of Parties with Whom PI is Shared:</u> Affiliates; Service Providers</p>

### Special Notice for Residents of California

The California Consumer Privacy Act of 2018 (CCPA), as amended by the California Privacy Rights Act of 2020 (“CPRA”), provides California residents with rights to receive certain disclosures regarding the collection, use, and sharing of information about them, as well as rights to know/access, delete, and limit sharing of personal information. You have the right to be free from discrimination based on your exercise of your CCPA rights. If you are a California resident and receive our services solely as a private individual – in other words,

not as a member or representative of a company or other organization – you are entitled to the privacy rights listed below.

### **Right to Know/Access**

- You have the right to request to know
  - the specific pieces of personal information we have about you;
  - the categories of personal information we have collected about you;
  - the categories of sources from which that personal information was collected;
  - the categories of your personal information that we sold or shared, or disclosed to a third party for a business purpose;
  - the categories of third parties to whom your personal information was sold or shared (and the category(ies) of personal information sold or shared with each category of third parties), or disclosed for a business purpose; and
  - the business or commercial purpose for collecting, selling or sharing your personal information.

### **Right to Opt-out of Sale or Sharing of Personal Information**

- We do not sell or share your personal information. Please note that your right to opt out does not apply to our sharing of personal information with service providers, as described in this Notice.

### **Right to Deletion**

- You have the right to request that we delete the personal information we have collected or maintained about you. We may deny your request under certain circumstances, such as if we need that personal information to comply with our legal obligations or complete a transaction for which your personal information was collected. If we deny your request for deletion, we will let you know the reason why.

### **Right to No Retaliation**

- If you choose to exercise any of these rights, Paylocity will not discriminate against you in any way. If you exercise certain rights, understand that you may be unable to use or access certain features of Paylocity's websites or services.



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

- You have the right, at any time, to direct us to limit the use of your sensitive personal information to what is necessary to perform the services reasonably expected by an average consumer, internal purposes, including to ensure the security and integrity of personal information, and as authorized by regulations.

### **Right to Correction**

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

### **HOW CAN YOU REVIEW, UPDATE, OR DELETE THE DATA WE COLLECT FROM YOU?**

Based on the laws of some countries, you may have the right to request access to the personal information we collect from you, change that information, or delete it in some circumstances. To request review, update, or delete your personal information, please submit a written request. We will respond to your request within 30 days.

### **Contact Information**

For questions or to exercise your rights, please contact: [careers@chandlerasset.com](mailto:careers@chandlerasset.com)

#### **Privacy/HR Department**

CHANDLER ASSET MANAGEMENT

[careers@chandlerasset.com](mailto:careers@chandlerasset.com)

(800) 317-4747

### **Policy Updates**

We may update this policy from time to time. Updates will be posted to our HRIS system and take effect immediately upon posting.