

California Privacy Notice for California Residents

This **Privacy Notice for California Residents** supplements the information contained in Hood River's Privacy Notice and applies solely to all visitors, users, applicants, employees and others who reside in the State of California ("covered individual(s)" or "you"). We adopt this Notice to comply with the California Privacy Rights Act (CPRA).

For purposes of this Notice, personal information does **NOT** include information that is exempted from the CPRA, such as personal information covered by other privacy laws including the Gramm-Leach-Bliley Act and the California Financial Information Privacy Act. Therefore, information we have obtained about you in order to provide financial services from us, or in order to service your account, is excluded from this Notice. For more information about how we collect, use and disclose this information, please refer to our **Hood River Privacy Notice**.

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 covered individual, household, or device ("**personal information**" or "**sensitive personal information**," as described below). It is important to note that the type of personal information or sensitive personal information we collect will depend on the covered individual's interaction with us.

HOOD RIVER DOES NOT AND WILL NOT SELL DATA COLLECTED TO ANY THIRD PARTY

Categories of Personal Information

Hood River may collect the following categories of personal information or sensitive personal information:

- Personal Information, including your name, telephone number, address, email address, and other information you provide through our website or send to Hood River by email or another electronic means. Additionally, if you apply to a Hood River job, we may also ask you to provide additional personal data as part of our job application process, such as your past employment history, name and contact information of previous employers, and date of birth. By submitting information to Hood River on or through this website or through any other means, you acknowledge that you have read this Policy, understand it, agree to its terms, and authorize Hood River to collect, use and disclose information pursuant to this Policy.
- Sensitive Personal Information, including your Social Security number, driver's license or identification card number(s), passport number, and financial account;
- Identifiers, such as government-issued identifier (e.g., national identification number);
- Characteristics of protected classifications under California or federal law, such as sex and marital status;
- Data on how you use this website, including your URL, pages viewed, how long you view our pages, how often you visit our website, and other similar information; and
- Data that identifies you, including your IP address, browser type and version, browser plug-in types, operating system and version, and geolocation information about where you might be.

For Hood River applicants and employees, Hood River may collect the additional categories of personal information or sensitive personal information when needed to assess an applicant or employee's suitability for employment at Hood River, and when required by federal or state law:

- Employment history;
- Employment reference names and contact information;
- Consumer credit history, when applicable;
- Criminal history, when applicable;
- Medical information or records, as needed for purposes related to workers' compensation, family or medical leave, or disability benefits or accommodations.

Recipients/Categories of Recipients

Your personal information may be shared with:

- Hood River Back and Middle Office Service Provider – When you provide the information above, it is received by Hood River, its representatives, and may also be received by its back and middle office service provider, Mar Vista Investment Partners, LLC. In such cases, the firm receiving the information is subject to this Privacy Policy.
- Our service providers – including, as applicable, Information Technology service providers, commercial email providers, and other vendors Hood River engages so that they may provide services to us or on our behalf.
- Other third parties – pursuant to a regulatory request or subpoena and/or when Hood River believes it is required by, or necessary to comply with, applicable law. Hood River may also provide your personal information to third parties when you ask us to do so. For Hood River's employees and applicants, such third parties may include entities or agencies with whom Hood River has contracted for the purposes of performing background checks, if applicable.

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

- Directly from you or those acting on your behalf. For example, from forms you complete online, when you request information, apply for employment or engage Hood River for products or services.
- Directly from those whom you expressly authorize Hood River to contact.
- Indirectly from you. For example, from information that is automatically collected from internet or other network activities regarding your interaction with our website.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to request or ask a question about our products or services, we will use that personal information to respond to your inquiry.
- To monitor website use and determine geographic areas of interest.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate an applicant's suitability for employment at Hood River, including verifying past employment, contacting applicant references, and initiating background checks, if applicable.
- To contact an applicant or employee regarding employment.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice. In such event, we will notify you by updating this Notice.

Disclosures of Personal Information for a Business Purpose

WE DO NOT AND WILL NOT SELL YOUR PERSONAL INFORMATION. We may disclose your personal information to a third party for a business purpose or for the purposes of verifying or obtaining information relevant to evaluate an applicant for employment. When we disclose personal information for a business purpose, we enter into a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, Hood River may have disclosed the categories of personal information listed above for business purposes to the following categories of parties (excluding disclosures we may be prohibited from reporting under applicable law):

- Our affiliated and un-affiliated service providers to help conduct our business.
- Third parties to whom you direct or authorize us to disclose your personal information, independent of or in connection with products or services we provide to you.
- Third parties with whom Hood River contracts to provide background check or other employment verification services.

Retention Period

Federal and state law requires Hood River to retain employment records for a specific amount of time. In compliance with these laws, Hood River retains employee personnel files for four (4) years after an employee separates from employment with Hood River, and retains all other employee records, including timesheets, paystubs, applications, and similar, for four (4) years after the date the record was created. Both employee personnel files and other employee records may contain personal information or sensitive personal information, as described above.

Hood River retains non-employment consumer records for up to one (1) year after creation of the consumer record. Such records may contain personal information or sensitive personal information, as described above.

The initiation of an investigation, claim, charge, civil action, or similar matter involving Hood River, its customers or potential customers, or Hood River's employees or applicants may cause Hood River to remove records and data relevant to the matter from its normal document destruction schedule and cause Hood River to retain documents for longer than the time periods set forth above. Such documents will be maintained only to the extent needed in connection with the investigation, claim, charge, civil action, or similar matter, and will be destroyed at the earliest date possible following conclusion of the matter, or in accordance with the time periods set forth above for employee records and consumer records, whichever is longer.

Your Rights and Choices

The CPRA provides covered individuals with specific rights regarding their personal information. This section describes your CPRA rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past twelve (12) months. Once we receive and confirm your verifiable request (see *“Exercising Access, Data Portability, Correction, Deletion, and Opt-out Rights”* Section below), we will 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 that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, identification of the personal information categories that each category of recipient obtained.

Right of Correction

You have the right to request that we rectify inaccurate information about you. To do this, see the *“Exercising Access, Data Portability, Correction, Deletion, and Opt-out Rights”* Section below.

Deletion Request Rights

You 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 and confirm your verifiable request (see *“Exercising Access, Data Portability, Correction, Deletion, and Opt-out Rights”* Section below), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. 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, or otherwise perform our contract with you.
2. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
3. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
4. Debug products to identify and repair errors that impair existing intended functionality.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*).
6. Comply with a legal obligation.
7. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.
8. Comply with federal or state record retention and other laws.

Request to Opt-Out of Information Sharing

Covered individuals have the right, at any time, to opt-out of sharing their personal information and/or to limit Hood River’s use of the covered individual’s sensitive personal information to that which is necessary to perform the services expected of a reasonable consumer using Hood River’s services, as well as any services set forth in Cal. Civ. Code § 1798.140(e). To do this, see the *“Exercising Access, Data Portability, Correction, Deletion, and Opt-out Rights”* Section below.

Exercising Access, Data Portability, Correction, Deletion, and Opt-out Rights

To exercise the access, data portability, correction, deletion, and opt-out rights described above, please submit a verifiable request to us by either:

- Calling us at 561-484-5699
- Emailing us at compliance@hoodrivercapital.com
- Visiting our website and submitting a request at: <https://hoodrivercapital.com/contact>

The verifiable request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized agent, which may include: name, phone number, email and/or mailing address. We will only use personal information provided in a verifiable request to verify the requestor's identity or authority to make the request.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. Please refer to the list of available data rights above.

Only you, or an authorized agent, may make a verifiable request related to your personal information. An authorized agent is a person or business entity registered with the California Secretary of State that a covered individual has legally authorized to act on their behalf. If you are an authorized agent and submit a data-rights request on behalf of a covered individual, we may require that the individual provide you with written authorization on their behalf and verify their own identity directly with us.

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. You may only make a verifiable request for access or data portability twice within a twelve (12) month period.

Response Timing and Format

We endeavor to respond to a verifiable request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. Any disclosures we provide will only cover the 12-month period preceding the verifiable request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

Non-Discrimination

We will not discriminate against you for exercising any of your CPRA rights. Unless permitted by the CPRA, we will not: deny you goods or services, charge you different prices or rates for goods or services (including through granting discounts or other benefits, or imposing penalties), provide you a different level or quality of goods or services, or suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes to Our California 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 on the website and update the Notice's effective date. **Your continued use of our website following the posting of changes constitutes your acceptance of such changes.** View all of Hood River's privacy policies online at: www.hoodrivercapital.com.

Contact Information

If you have any questions or comments about this Notice, the ways in which we collect and use your information described here or in the Hood River Privacy Notice, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 561-484-5699

Email: compliance@hoodrivercapital.com

Postal Address:

Hood River Capital Management LLC

2373 PGA Boulevard, Suite 200

Palm Beach Gardens, FL 33410

Attn: Compliance Department