

Privacy Notice for California Employees, Contractors, Dependents, Emergency Contacts, and Job Applicants

Effective date: January 1, 2020

This Privacy Notice for California Employees, Contractors, Dependents, Emergency Contacts, and Job Applicants (“Notice”) supplements the information contained in Rimini Street, Inc.’s and its affiliates’ (collectively, “Company”) Privacy Policy (available at <https://www.riministreet.com/privacy-policy>), and applies solely to current and former employees of the Company, independent contractors, dependents and beneficiaries of employees, emergency contacts for employees, and job applicants, who reside in the state of California (each, a “Resident,” and collectively, “Residents”). The Company has adopted this Notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”). Any terms defined in the CCPA have the same meaning when used in this Notice.

Resident Personal Information Collected, Used and Disclosed by the Company

The Company collects information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Resident (“Personal Information”). In particular, the Company has collected the following Personal Information from Residents within the last twelve (12) months as outlined below:

Category of Personal Information: **Identifiers**

Examples: 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.

Does the Company collect this category of Personal Information from Residents? YES.

The Company obtains this category of Personal Information from the following categories of sources:

- Directly from Residents or their agents. For example, from job applications that candidates submit to the Company when applying for employment with the Company.
- Indirectly from Residents or their agents. For example, through information the Company compiles about Residents when maintaining a personnel file containing employment and job performance records.
- From third parties that interact with the Company in connection with the Company’s operations, such as third parties that assist the Company with staffing, benefits administration, and other human resources functions.

The Company may use or disclose the Personal Information it collects from this category for one or more of the following purposes:

- To fulfill or meet the reason for which the information is provided. For example, if a Resident provides the Company with a Social Security number for the purposes of verifying employment eligibility, the Company will use that information to verify the Resident’s eligibility for employment with the Company.
- To provide, support, and develop the Company’s human resources and personnel functions, including but not limited to hiring/termination, conducting background checks, onboarding new employees, managing and maintaining employer-employee relations, managing Company relations with independent contractors, determining and providing compensation and benefits, keeping time records, providing employee training and development, undertaking internal

research, and other functions related to employment or potential employment with the Company.

- To create, maintain, and secure a Resident's personnel files with the Company, including emergency contact information.
- To comply with state and federal law requiring the Company to prepare and maintain certain records.
- To effectively process payroll.
- To manage employee performance of their job duties.
- To administer and maintain group health insurance benefits, 401(k) and retirement plans, and other Company benefits, as applicable.
- To provide Residents with email alerts, Company event registrations and other notices concerning the Company and a Resident's employment with the Company (as applicable).
- To provide Residents with information that Residents request from the Company.
- To carry out the Company's obligations and enforce the Company's rights arising from any contracts entered into between the Resident and the Company.
- As necessary or appropriate to protect the rights, property, or safety of the Company, its clients, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by the Company is among the assets transferred.
- As described to Residents when collecting a Resident's Personal Information.

In the preceding twelve (12) months, the Company has disclosed Personal Information from this category to the following categories of third parties for a business purpose:

- Service providers.
- Third parties to whom you or your agents direct or authorize the Company to disclose your Personal Information.

Category of Personal Information: Personal Information Categories Listed in the California Customer Records Statute (Cal. Civ. Code §1798.80(e))

Examples: 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.

Does the Company collect this category of Personal Information from Residents? YES.

The Company obtains this category of Personal Information from the following categories of sources:

- Directly from Residents or their agents. For example, from job applications that candidates submit to the Company when applying for employment with the Company.
- Indirectly from Residents or their agents. For example, through information the Company compiles about Residents when maintaining a personnel file containing employment and job performance records.
- From third parties that interact with the Company in connection with the Company's operations, such as third parties that assist the Company with staffing, benefits administration, and other human resources functions.

The Company may use or disclose the Personal Information it collects from this category for one or more of the following purposes:

- To fulfill or meet the reason for which the information is provided. For example, if a Resident provides the Company with bank account information for the purposes of setting up a direct deposit payment option, the Company will use that information to initiate the electronic transfer of the Resident's pay directly to the Resident's bank account.
- To provide, support, and develop the Company's human resources and personnel functions, including but not limited to hiring/termination, conducting background checks, onboarding new employees, managing and maintaining employer-employee relations, managing Company relations with independent contractors, determining and providing compensation and benefits, keeping time records, providing employee training and development, undertaking internal research, and other functions related to employment or potential employment with the Company.
- To create, maintain, and secure a Resident's personnel files with the Company, including emergency contact information.
- To comply with state and federal law requiring the Company to prepare and maintain certain records.
- To effectively process payroll.
- To manage employee performance of their job duties.
- To administer and maintain group health insurance benefits, 401(k) and retirement plans, and other Company benefits, as applicable.
- To provide Residents with email alerts, Company event registrations and other notices concerning the Company and a Resident's employment with the Company (as applicable).
- To provide Residents with information that Residents request from the Company.
- To carry out the Company's obligations and enforce the Company's rights arising from any contracts entered into between the Resident and the Company.
- As necessary or appropriate to protect the rights, property, or safety of the Company, its clients, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by the Company is among the assets transferred.
- As described to Residents when collecting a Resident's Personal Information.

In the preceding twelve (12) months, the Company has disclosed Personal Information from this category to the following categories of third parties for a business purpose:

- Service providers.
- Third parties to whom you or your agents direct or authorize the Company to disclose your Personal Information.

Category of Personal Information: Protected Classification Characteristics under California or Federal Law

Examples: 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).

Does the Company collect this category of Personal Information from Residents? YES.

The Company obtains this category of Personal Information from the following categories of sources:

- Directly from Residents or their agents. For example, from information that potential new hires provide to the Company in order for the Company to verify their employment eligibility.
- Indirectly from Residents or their agents. For example, through information the Company compiles about Residents when maintaining a personnel file containing employment records.
- From third parties that interact with the Company in connection with the Company's operations, such as third parties that assist the Company with staffing, benefits administration, and other human resources functions.

The Company may use or disclose the Personal Information it collects from this category for one or more of the following purposes:

- To fulfill or meet the reason for which the information is provided. For example, if a Resident provides the Company with citizenship information for the purposes of verifying employment eligibility, the Company will use that information to verify the Resident's eligibility for employment with the Company.
- To provide, support, and develop the Company's human resources and personnel functions, including but not limited to conducting background checks, onboarding new employees, managing and maintaining employer-employee relations, managing Company relations with independent contractors, providing employee training and development, undertaking internal research, and other functions related to employment or potential employment with the Company.
- To create, maintain, and secure a Resident's personnel files with the Company, including emergency contact information.
- To comply with state and federal law requiring the Company to prepare and maintain certain records.
- To administer and maintain group health insurance benefits, 401(k) and retirement plans, and other Company benefits, as applicable.
- As necessary or appropriate to protect the rights, property, or safety of the Company, its clients, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by the Company is among the assets transferred.
- As described to Residents when collecting a Resident's Personal Information.

In the preceding twelve (12) months, the Company has disclosed Personal Information from this category to the following categories of third parties for a business purpose:

- Service providers.
- Third parties to whom you or your agents direct or authorize the Company to disclose your Personal Information.

Category of Personal Information: **Commercial Information**

Examples: Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Does the Company collect this category of Personal Information from Residents? NO.

Category of Personal Information: **Biometric Information**

Examples: 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.

Does the Company collect this category of Personal Information from Residents? YES.

The Company obtains this category of Personal Information from the following categories of sources:

- Directly from Residents or their agents. For example, from health data that a Resident provides to the Company when enrolling in a Company benefit plan.
- Indirectly from Residents or their agents. For example, through information the Company compiles about Residents when maintaining a personnel file containing employment records.
- From third parties that interact with the Company in connection with the Company's operations, such as third parties that assist the Company with benefits administration and other human resources functions.

The Company may use or disclose the Personal Information it collects from this category for one or more of the following purposes:

- To fulfill or meet the reason for which the information is provided. For example, if a Resident provides the Company with health data for the purposes of enrolling in a Company health plan and receiving benefits, the Company will use that information to process the enrollment and administer benefits.
- To provide, support, and develop the Company's human resources and personnel functions, including but not limited to conducting background checks, onboarding new employees, managing and maintaining employer-employee relations, managing Company relations with independent contractors, providing employee training and development, undertaking internal research, and other functions related to employment or potential employment with the Company.
- To create, maintain, and secure a Resident's personnel files with the Company.
- To comply with state and federal law requiring the Company to prepare and maintain certain records.
- To administer and maintain group health insurance benefits and other Company benefits, as applicable.
- To provide Residents with information that Residents request from the Company.
- To carry out the Company's obligations and enforce the Company's rights arising from any contracts entered into between the Resident and the Company.
- As necessary or appropriate to protect the rights, property, or safety of the Company, its clients, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of

bankruptcy, liquidation, or similar proceeding, in which Personal Information held by the Company is among the assets transferred.

- As described to Residents when collecting a Resident's Personal Information.

In the preceding twelve (12) months, the Company has disclosed Personal Information from this category to the following categories of third parties for a business purpose:

- Service providers.
- Third parties to whom you or your agents direct or authorize the Company to disclose your Personal Information.

Category of Personal Information: Internet or Other Similar Network Activity

Examples: Browsing history, search history, information on a Resident's interaction with a website, application, or advertisement.

Does the Company collect this category of Personal Information from Residents? YES.

The Company obtains this category of Personal Information from the following categories of sources:

- Directly from Residents or their agents.
- Indirectly from Residents or their agents.
- From third parties that interact with the Company in connection with the Company's operations, such as third parties that assist the Company with application operation and other information technology functions.

The Company may use or disclose the Personal Information it collects from this category for one or more of the following purposes:

- To fulfill or meet the reason for which the information is provided.
- To provide, support, and develop the Company's human resources and personnel functions, including but not limited to managing and maintaining employer-employee relations, managing Company relations with independent contractors, undertaking internal research, and other functions related to employment or potential employment with the Company.
- To comply with state and federal law requiring the Company to prepare and maintain certain records.
- To manage employee performance of their job duties.
- To carry out the Company's obligations and enforce the Company's rights arising from any contracts entered into between the Resident and the Company.
- As necessary or appropriate to protect the rights, property, or safety of the Company, its clients, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by the Company is among the assets transferred.
- As described to Residents when collecting a Resident's Personal Information.

In the preceding twelve (12) months, the Company has disclosed Personal Information from this category to the following categories of third parties for a business purpose:

- Service providers.
- Third parties to whom you or your agents direct or authorize the Company to disclose your Personal Information.

Category of Personal Information: Geolocation Data

Examples: Physical location or movements.

Does the Company collect this category of Personal Information from Residents? YES.

The Company obtains this category of Personal Information from the following categories of sources:

- Directly from Residents or their agents. For example, from physical address information that Residents provide to the Company in order to receive correspondence and documents from the Company.
- Indirectly from Residents or their agents. For example, through information the Company compiles about Residents when maintaining a personnel file containing employment records.
- From third parties that interact with the Company in connection with the Company's operations, such as third parties that assist the Company with staffing, benefits administration, and other human resources functions.

The Company may use or disclose the Personal Information it collects from this category for one or more of the following purposes:

- To fulfill or meet the reason for which the information is provided. For example, if a Resident provides the Company with the Resident's physical address for the purposes of receiving correspondence and documents from the Company, the Company will use that information to mail such correspondence and documents to the Resident's physical address.
- To provide, support, and develop the Company's human resources and personnel functions, including but not limited to hiring/termination, conducting background checks, onboarding new employees, managing and maintaining employer-employee relations, managing Company relations with independent contractors, undertaking internal research, and other functions related to employment or potential employment with the Company.
- To create, maintain, and secure a Resident's personnel files with the Company, including emergency contact information.
- To comply with state and federal law requiring the Company to prepare and maintain certain records.
- To effectively process payroll.
- To administer and maintain group health insurance benefits, 401(k) and retirement plans, and other Company benefits, as applicable.
- To provide Residents with alerts, Company event registrations and other notices concerning the Company and a Resident's employment with the Company (as applicable).
- To provide Residents with information that Residents request from the Company.
- To carry out the Company's obligations and enforce the Company's rights arising from any contracts entered into between the Resident and the Company.
- As necessary or appropriate to protect the rights, property, or safety of the Company, its clients, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by the Company is among the assets transferred.
- As described to Residents when collecting a Resident's Personal Information.

In the preceding twelve (12) months, the Company has disclosed Personal Information from this category to the following categories of third parties for a business purpose:

- Service providers.
- Third parties to whom you or your agents direct or authorize the Company to disclose your Personal Information.

Category of Personal Information: Sensory Data

Examples: Audio, electronic, visual, thermal, olfactory, or similar information.

Does the Company collect this category of Personal Information from Residents? YES.

The Company obtains this category of Personal Information from the following categories of sources:

- Directly from Residents or their agents. For example, when Residents provide the Company with a headshot photograph for inclusion on the Company website or inclusion with the Resident's Company biography.
- Indirectly from Residents or their agents. For example, when the Company takes photographs of its employees attending Company events.
- From third parties that interact with the Company in connection with the Company's operations, such as third parties that assist the Company with Company events and other human resources functions on behalf of the Company.

The Company may use or disclose the Personal Information it collects from this category for one or more of the following purposes:

- To fulfill or meet the reason for which the information is provided. For example, if a Resident provides the Company with a headshot photograph for inclusion on the Company website, the Company will use that headshot photograph to accompany the Resident's biography on the Company's website.
- To provide, support, and develop the Company's human resources and personnel functions, including but not limited to hiring, conducting background checks, onboarding new employees, managing and maintaining employer-employee relations, managing Company relations with independent contractors, maintaining personnel rosters and biographies, documenting Company events, securing facilities access, recording audio for voicemail messages and other prerecorded messages, providing employee training and development, undertaking internal research, and other functions related to employment or potential employment with the Company.
- To create, maintain, and secure a Resident's personnel files with the Company.
- To comply with state and federal law requiring the Company to prepare and maintain certain records.
- To provide Residents with information that Residents request from the Company.
- To carry out the Company's obligations and enforce the Company's rights arising from any contracts entered into between the Resident and the Company.
- As necessary or appropriate to protect the rights, property, or safety of the Company, its clients, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by the Company is among the assets transferred.
- As described to Residents when collecting a Resident's Personal Information.

In the preceding twelve (12) months, the Company has disclosed Personal Information from this category to the following categories of third parties for a business purpose:

- Service providers.
- Third parties to whom you or your agents direct or authorize the Company to disclose your Personal Information.

Category of Personal Information: Professional or Employment-Related Information

Examples: Current or past employment history (CV/resume/job application), performance evaluations, banking information, educational information, retirement information/planning, Social Security numbers, immigration status, driver's license and other government-issued identification, dependent and beneficiary information, emergency contact information, family details (dependents, ages, marriage, prior marriage), participation in Company-sponsored events or programs, health information, salary history, home address (current and past), telephone numbers, email addresses, insurance and benefit plan information, background check forms and results, job interview notes, and candidate evaluation records.

Does the Company collect this category of Personal Information from Residents? YES.

The Company obtains this category of Personal Information from the following categories of sources:

- Directly from Residents or their agents. For example, from job applications that candidates submit to the Company when applying for employment with the Company.
- Indirectly from Residents or their agents. For example, through information the Company compiles about Residents when maintaining a personnel file containing employment and job performance records.
- From third parties that interact with the Company in connection with the Company's operations, such as third parties that assist the Company with staffing, benefits administration, and other human resources functions.

The Company may use or disclose the Personal Information it collects from this category for one or more of the following purposes:

- To fulfill or meet the reason for which the information is provided. For example, if a Resident provides the Company with bank account information for the purposes of setting up a direct deposit payment option, the Company will use that information to initiate the electronic transfer of the Resident's pay directly to the Resident's bank account.
- To provide, support, and develop the Company's human resources and personnel functions, including but not limited to hiring/termination, conducting background checks, onboarding new employees, managing and maintaining employer-employee relations, managing Company relations with independent contractors, determining and providing compensation and benefits, keeping time records, providing employee training and development, undertaking internal research, and other functions related to employment or potential employment with the Company.
- To create, maintain, and secure a Resident's personnel files with the Company, including emergency contact information.
- To comply with state and federal law requiring the Company to prepare and maintain certain records.
- To effectively process payroll.
- To manage employee performance of their job duties.
- To administer and maintain group health insurance benefits, 401(k) and retirement plans, and other Company benefits, as applicable.
- To provide Residents with email alerts, Company event registrations and other notices concerning the Company and a Resident's employment with the Company (as applicable).

- To provide Residents with information that Residents request from the Company.
- To carry out the Company's obligations and enforce the Company's rights arising from any contracts entered into between the Resident and the Company.
- As necessary or appropriate to protect the rights, property, or safety of the Company, its clients, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by the Company is among the assets transferred.
- As described to Residents when collecting a Resident's Personal Information.

In the preceding twelve (12) months, the Company has disclosed Personal Information from this category to the following categories of third parties for a business purpose:

- Service providers.
- Third parties to whom you or your agents direct or authorize the Company to disclose your Personal Information.

Category of Personal Information: Non-public Education Information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99))

Examples: 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.

Does the Company collect this category of Personal Information from Residents? YES.

The Company obtains this category of Personal Information from the following categories of sources:

- Directly from Residents or their agents. For example, from transcripts that candidates submit to the Company when applying for employment with the Company.
- Indirectly from Residents or their agents. For example, through information the Company compiles about Residents when maintaining a personnel file containing employment records.
- From third parties that interact with the Company in connection with the Company's operations, such as third parties that assist the Company with staffing and other human resources functions.

The Company may use or disclose the Personal Information it collects from this category for one or more of the following purposes:

- To fulfill or meet the reason for which the information is provided. For example, if a Resident provides the Company with a transcript when applying for a position with the Company, the Company will review the Resident's transcript to assess the Resident's qualifications.
- To provide, support, and develop the Company's human resources and personnel functions, including but not limited to hiring/termination, conducting background checks, onboarding new employees, managing and maintaining employer-employee relations, managing Company relations with independent contractors, providing employee training and development, undertaking internal research, and other functions related to employment or potential employment with the Company.
- To create, maintain, and secure a Resident's personnel files with the Company.
- To comply with state and federal law requiring the Company to prepare and maintain certain records.
- To provide Residents with information that Residents request from the Company.

- To carry out the Company's obligations and enforce the Company's rights arising from any contracts entered into between the Resident and the Company.
- As necessary or appropriate to protect the rights, property, or safety of the Company, its clients, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by the Company is among the assets transferred.
- As described to Residents when collecting a Resident's Personal Information.

In the preceding twelve (12) months, the Company has disclosed Personal Information from this category to the following categories of third parties for a business purpose:

- Service providers.
- Third parties to whom you or your agents direct or authorize the Company to disclose your Personal Information.

Category of Personal Information: Inferences Drawn from Other Personal Information

Examples: Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Does the Company collect this category of Personal Information from Residents? YES.

The Company obtains this category of Personal Information from the following categories of sources:

- Directly from Residents or their agents. For example, from job applications that candidates submit to the Company when applying for employment with the Company.
- Indirectly from Residents or their agents. For example, through information the Company compiles about Residents when maintaining a personnel file containing employment and job performance records.
- From third parties that interact with the Company in connection with the Company's operations, such as third parties that assist the Company with staffing and other human resources functions.

The Company may use or disclose the Personal Information it collects from this category for one or more of the following purposes:

- To fulfill or meet the reason for which the information is provided. For example, if a Resident provides the Company with a self-evaluation of their job performance for a performance review, the Company will analyze that self-evaluation as part of reviewing the employee's overall performance.
- To provide, support, and develop the Company's human resources and personnel functions, including but not limited to hiring/termination, conducting background checks, onboarding new employees, managing and maintaining employer-employee relations, managing Company relations with independent contractors, determining and providing compensation and benefits, providing employee training and development, undertaking internal research, and other functions related to employment or potential employment with the Company.
- To create, maintain, and secure a Resident's personnel files with the Company, including emergency contact information.
- To comply with state and federal law requiring the Company to prepare and maintain certain records.
- To manage employee performance of their job duties.

- To provide Residents with information that Residents request from the Company.
- To carry out the Company's obligations and enforce the Company's rights arising from any contracts entered into between the Resident and the Company.
- As necessary or appropriate to protect the rights, property, or safety of the Company, its clients, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Information held by the Company is among the assets transferred.
- As described to Residents when collecting a Resident's Personal Information.

In the preceding twelve (12) months, the Company has disclosed Personal Information from this category to the following categories of third parties for a business purpose:

- Service providers.
- Third parties to whom you or your agents direct or authorize the Company to disclose your Personal Information.

General Information Regarding the Company's Collection, Use and Disclosure of Resident Personal Information

Information that Does Not Constitute Personal Information

Personal Information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as:
- 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; and
- 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.

Disclosing Personal Information to a Third Party for a Business Purpose

The Company may disclose a Resident's Personal Information to a third party for a business purpose. When the Company discloses Personal Information for a business purpose, the Company enters 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.

The Company Does Not Sell Personal Information

In the preceding twelve (12) months, the Company has not sold any Personal Information. The Company does not and will not sell Personal Information. If, in the future, the Company anticipates selling your Personal Information to any party, the Company will provide you with the opt-out and opt-in rights required by the CCPA.

Changes to This Notice

The Company reserves the right to amend this Notice at the Company's discretion and at any time. When the Company makes changes to this Notice, the Company will submit the updated notice to you directly

by email using your Company email address or other applicable email address (for independent contractors and Company employees and their dependents/emergency contacts), or by posting the updated Notice on the Company's applicable job application website or application and updating the Notice's effective date (for job applicants).

Contact Information

If you have any questions or comments about this Notice, the Company's Privacy Policy, or the ways in which the Company collects and uses your Personal Information as described above, please do not hesitate to contact the Company at:

Phone: Rimini Street Compliance Helpline at 1-844-754-3342

Website: www.riministreet.com

Email: privacy@riministreet.com

Postal Address:

Rimini Street, Inc.

Attn: Privacy

3993 Howard Hughes Parkway,

Suite 500, Las Vegas, Nevada 89169

USA