

Tiber Capital Partners, LLC Employee Privacy Notice for California Residents

Effective Date: January 1, 2020

Last Updated on: December 23, 2019

This **Employee Privacy Notice for California Residents** applies solely to Tiber Capital Partners, LLC’s (“Edge”) collection and use of personal data of employees who reside in the State of California (“you”) for a number of purposes connected with your employment with Edge. 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.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you (“Personal Information”). In particular, we have collected the following categories of Personal Information from you within the last twelve (12) months:

Category of Personal Information	Examples¹
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).
Internet or other similar network activity.	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.
Professional or employment-related information.	Current or past job history or performance evaluations.

¹ Examples are provided for illustrative purposes only. Edge does not collect all of the specific Personal Information provided as examples below.

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;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

Categories of Sources

Edge obtains the categories of Personal Information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete.
- Indirectly from you. For example, through information we collect from you in the ordinary course of your employment or you authorize a third-party to provide.
- From service providers that interact with us in connection with the services performed.

Use of Personal Information

We may use or disclose the Personal Information we collect for one or more of the following business or commercial purposes (each, a “Business Purpose”):

Category	Business Purpose
Identifiers.	<ul style="list-style-type: none"> • Take actions and make decisions regarding your employment. • Administer your benefits. • Evaluate applications for employment or internal promotion. • Comply with our legal obligations. • Provide you with information, products or services that you request from us. • For marketing and informational purposes. • As necessary or appropriate to protect the rights, property, or safety of us, our clients, or others.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	<ul style="list-style-type: none"> • Take actions and make decisions regarding your employment. • Administer your benefits. • Evaluate applications for employment or internal promotion. • Comply with our legal obligations. • Provide you with information, products or services that you request from us. • For marketing and informational purposes. • As necessary or appropriate to protect the rights, property, or safety of us, our clients, or others.
Protected classification characteristics under California or federal law.	<ul style="list-style-type: none"> • Administer your benefits. • Comply with our legal obligations. • Provide you with information, products or services that you request from us. • As necessary or appropriate to protect the rights, property, or safety of us, our clients, or others.
Internet or other similar network	<ul style="list-style-type: none"> • Take actions and make decisions regarding your employment. • Evaluate applications for employment or internal promotion.

activity.	<ul style="list-style-type: none"> • Comply with our legal obligations. • Provide you with information, products or services that you request from us. • As necessary or appropriate to protect the rights, property, or safety of us, our clients, or others.
Professional or employment-related information.	<ul style="list-style-type: none"> • Take actions and make decisions regarding your employment. • Administer your benefits. • Evaluate applications for employment or internal promotion. • Comply with our legal obligations. • Provide you with information, products or services that you request from us. • For marketing and informational purposes. • As necessary or appropriate to protect the rights, property, or safety of us, our clients, or others.

Edge 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.

Sharing Personal Information

Access to your Personal Information will generally be limited to those individuals with a relevant responsibility, e.g. HR personnel, managers, the IT team, the compliance team and the legal team. However, some Personal Information will be made available generally to other employees, for example on our corporate directory or our intranet, in order to facilitate communication and co-operation between employees.

Edge may disclose your personal information to a third party, including our affiliates and subsidiaries, our service providers, business counterparties, visitors of Edge’s website, existing and prospective investors of funds managed by Edge Principal Advisors, LLC, and government agencies and law enforcement officials, for a Business Purpose.

Disclosures of Personal Information for a Business Purpose

In the twelve (12) months preceding the Effective Date, we have disclosed the following Categories of Personal Information for a Business Purpose:

- Identifiers
- California Customer Records personal information categories
- Protected classification characteristics under California or federal law
- Professional or employment-related information

Categories of Third Parties to Whom We Disclose

In the twelve (12) months preceding the Effective Date, we have disclosed your Personal Information for a Business Purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Visitors of Edge’s website, www.edgepe.com.
- Existing and prospective investors of funds managed by Edge Principal Advisors, LLC.
- Business counterparties.
- Government agencies and law enforcement officials.

Sales of Personal Information

In the twelve (12) months preceding the Effective Date, we have not sold any personal information.

Retention of Personal Information

Personal information will not be kept for longer than is necessary for the Business Purpose for which it is collected and processed and will be retained in accordance with our internal document retention policies. In certain cases, laws or regulations require us to keep records for specific periods of time, including following termination of the employment relationship. In other cases, records are retained in order to administer the employment relationship or to resolve queries or disputes which arise from time to time.

Security of Personal Information

Edge has implemented reasonable physical, technical and administrative security standards to protect your Personal Information from loss, misuse, alteration, destruction or damage.

Changes to Our Employee Privacy Notice for California Residents

Edge reserves 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 Edge's website at <http://edgepe.com/privacy-policy/> and update the notice's effective date.

Contact Information

If you have any questions or comments about this notice, the ways in which Edge collects and uses your information, 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: 1-866-982-2637

Website: <http://edgepe.com/personal-information-requests>