

California Privacy Policy

AQR Capital Management, LLC and its affiliates, including AQR Arbitrage, LLC and AQR Investments, LLC (collectively, “AQR” or “we”), have adopted this Privacy Policy (the “Policy”) to notify certain individuals whose personal information AQR collects, uses, stores or otherwise processes. This Policy governs AQR’s approach and procedures regarding personal information of prospective and current employees, partners and contractors who are residents of California, to which the California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (collectively, the “CPRA”) applies. For personal information outside the scope of the CPRA, AQR’s policies and procedures may vary.

The personal information we collect from you:

Over the last twelve (12) months, we may have collected the following categories of personal information about you as part of our pre-employment (*i.e.*, during the hiring/recruiting process) and ongoing employment or contractor relationship with you:

- *Category A:* Identifiers, including contact and identifying information of you and certain of your family members or others (*e.g.*, name, Social Security number, passport number, driver’s license details, tax ID number, national identifier or other government-issued identification number, birthdate, place of birth, email, address, and phone number).
- *Category B:* Personal information listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), including signature, bank account or other financial information (*e.g.*, for direct deposit), health insurance, and proof of COVID-19 vaccination status and other medical information.
- *Category C:* Protected classification characteristics under California or federal law, including race, ethnicity, national origin, sex, gender identity, sexual orientation, military and veteran status, self-identified disability status, and marital status.
- *Category D:* Commercial information, including address history and product/service purchase information (*e.g.*, for expense reimbursement requests).
- *Category F:* Internet or other electronic network activity, including IP addresses, unique device identifiers, browser and operating system characteristics, device characteristics, language preferences, clickstream data, referring/exit URLs, information on actions taken, dates and times of activity, and other technical information.
- *Category G:* Geolocation data relating to swiping your identification badge at AQR’s offices.
- *Category H:* Audio, electronic, visual, or similar information, including photographs, video, and audio recordings.
- *Category I:* Professional or employment-related information, including employment history, other information about your qualifications for employment such as information contained in your résumé, C.V., or cover letter, compensation history and related information, information provided by references, citizenship and work authorization, LinkedIn profile, language proficiencies, and other work-related skills.
- *Category J:* Education information, including educational history.
- *Category L:* Sensitive personal information, including certain information listed above.

Sources, use and disclosure of your personal information:

We collect personal information about you that you or others provide us directly, as well as from the following additional sources. For purposes of recruitment for employment or in connection with a contractor engagement, we may obtain some information from third parties; for example, references from a previous employer or recruitment agencies, or results (civil, criminal, regulatory, credit, etc.) from a

background check company. We may also obtain information from third parties, including from a background check company, with respect to current employees.

We also may obtain certain information by automated means, such as through cookies, web server logs, web beacons and JavaScript when you visit our websites¹ (collectively, the “Sites”), open our emails or interact with AQR-related tools, widgets, or plug-ins.

Within the past twelve (12) months, we may have disclosed your personal information to payroll processing and other service providers and vendors that require such information to perform services on our behalf.

We use the personal information we collect about you to provide you and/or your family or others (at your request) compensation and other employment benefits (*e.g.*, health and dental insurance, 401(k)). Certain of your personal information, such as mobile phone number, may also be posted on our internal network (available to other AQR employees and staff); you may edit or limit the sharing of this information if you choose. In addition, for certain employees, we may also post certain of their personal information (*e.g.*, name, educational background, and AQR contact information) and their photograph online as part of our website available at www.aqr.com.

In addition, we may use and disclose certain of your personal information, including information we collect about you through technology (*e.g.*, browsing history, information in your AQR email account, and communication data) with others (i) to ensure that AQR policies and procedures are being followed; (ii) to ensure the safety, security and integrity of our workplace and information technology systems; (iii) to comply with applicable laws, regulations, subpoenas, legal processes, governmental investigations or inquiries; (iv) to cooperate with law enforcement; and (v) to assert or defend legal claims.

We use third-party web analytics services on the Sites. The information obtained for this purpose (including your IP address and other information collected by automated means) will be shared with or collected directly by these third-party service providers and other relevant third parties who use the information to evaluate use of the Sites.

We do not “sell” or “share” (as such terms are defined in the CPRA) any of your personal information.

The length of time we retain your personal information:

To the extent permitted by applicable law, we retain personal information we collect about you as long as (i) reasonably necessary to fulfill the purposes for which we collected it or (ii) we have another lawful basis (*e.g.*, as required by law or regulation) for retaining the personal information beyond such period.

Your rights under the CPRA:

Deletion Rights: You have the right to request that we delete any of your personal information that we retain, subject to certain statutory exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules, and regulations. We will notify you in writing if we cannot comply with a specific request and provide an explanation of the reasons.

¹ This Policy applies to AQR’s online processing of information through the following websites:
<https://www.aqr.com/>;
<https://australia.aqr.com/>;
<https://ucits.aqr.com/>; <http://services.aqr.com/>;

Correction Rights: You have the right to request that we correct inaccurate personal information about you.

Disclosure and Access Rights: You have the right to request that we disclose to you certain information regarding our collection and use of personal information specific to you over the last twelve (12) months.

Non-Discrimination: We will not discriminate against you for exercising your rights under the CPRA, which includes your right not to be retaliated against for the exercise of your CPRA rights.

How to Exercise Your Rights: To exercise any of your rights under the CPRA, or to access this notice in an alternative format, please submit a request on your behalf using either of the methods set forth in the “Contact us” section below.

Contact us:

For any requests relating to the exercise of your rights under the CPRA, or questions regarding our processing of your personal information, please submit a request using any of the methods set forth below.

- Call us toll-free at 1 (866) 821-0338; or
- Email us at privacy@aqr.com outlining your request.

We will contact you to confirm receipt of your request under the CPRA and request any additional information necessary to verify your request. We verify requests by matching information provided in connection with your request to information contained in our records. Depending on the sensitivity of the request and the varying levels of risk in responding to such requests (for example, the risk of responding to fraudulent or malicious requests), we may request further information to verify your request. You may designate an authorized agent to make a request under the CPRA on your behalf, if you provide a signed agreement verifying such authorized agent’s authority to make requests on your behalf, and we may verify such authorized person’s identity using the procedures above. Our goal is to respond to any verifiable request within forty-five (45) days of our receipt of such request, but in certain cases, additional time might be required (*e.g.*, up to 90 days).

Any queries regarding any aspects of our data privacy policies and procedures should be directed to privacy@aqr.com.

As Adopted: December 2022