CALIFORNIA PRIVACY POLICY

As Adopted: December 2022

Last Reviewed: November 2025

AQR Capital Management, LLC and its affiliates, including AQR Arbitrage, LLC and AQR Investments, LLC (collectively, "AQR" or "we"), have adopted this California 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 California residents who are (1) AQR employees, partners, and contractors (collectively, "AQR Personnel"), (2) emergency contacts of AQR Personnel, and (3) individuals related to AQR Personnel for whom AQR administers benefits (collectively with AQR Personnel, "Covered Individuals").

AQR Personnel are responsible for providing this Policy to any Covered Individual whose personal information is provided to AQR by AQR Personnel. Certain terms used in this Policy have the meanings given to them in the California Consumer Privacy Act (as amended by the California Privacy Rights Act of 2020) and its implementing regulations (collectively, the "CCPA").

Notice of Collection and Use of Personal Information:

AQR may collect (and may have collected during the 12-month period prior to the Last Updated date of this Policy (the "Term")) the following categories of personal information about Covered Individuals:

- *Identifiers:* Identifiers, including contact and identifying information (*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).
- *Additional Data Subject to Cal. Civ. Code § 1798.80:* Personal information listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), including signature, state identification card number, bank account number or other financial information (*e.g.*, for direct deposit), education information, health insurance, and other medical information.
- *Protected Classifications:* Protected classification characteristics under California or federal law, including race, ethnicity, national origin, age, sex, gender, gender identity, gender expression, sexual orientation, citizenship, military and veteran status, self-identified disability status, and marital status.
- *Commercial Information:* Commercial information, including address history and product/service purchase information (*e.g.*, for expense reimbursement requests).
- *Online Activity:* 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.
- *Geolocation Data:* Geolocation data relating to swiping your identification badge at AQR's offices.
- *Sensory Information:* Audio, electronic, visual, or similar information, including photographs, video, and audio recordings.
- *Employment Information:* 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, certifications and professional associations, citizenship and work

authorization, LinkedIn profile, language proficiencies, other work-related skills, emergency contact information, dependent information, and background check information, including criminal records information.

- *Education Information:* Education information, including educational history, that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).
- *Sensitive Personal Information:* Sensitive personal information, including certain information listed above.

AQR may use (and may have used during the Term) personal information for the purpose of carrying out and supporting certain functions and activities (such as Human Resources functions), including the uses described below. We also list below relevant "business purposes" as they are described in the CCPA.

- Managing work activities and personnel generally, including recruiting; performing background checks; determining suitability for employment or promotion; determining physical and/or mental fitness for work; managing AQR Personnel onboarding; reviewing and evaluating performance; determining and reviewing compensation; providing references; managing attendance, medical leaves or other leaves of absences, and time off; administering payroll services; reimbursing expenses; administering health, dental, and other benefits; accommodating disabilities or illnesses; training and talent development; facilitating employee relocations and transfers; making travel arrangements; securing immigration statuses; monitoring staff; creating staff directories; managing AQR Personnel headcount, work planning and office allocation; investigating suspected misconduct or non-performance of duties; managing disciplinary matters, grievances, and terminations; reviewing staffing decisions; providing access to facilities; managing communications and relations with Covered Individuals; and carrying out obligations under employment contracts.

- Ensuring business continuity; protecting the health and safety of staff and others; safeguarding, monitoring, and maintaining information technology and information security infrastructure (collectively, "IT"), office equipment, facilities, and other property; providing technical support; detecting or preventing theft or fraud, or attempted theft or fraud; and facilitating communication with you and your designated contacts in an emergency.

- Operating and managing IT, communications systems and facilities, and monitoring the use of these resources; performing data analytics; improving services; allocating and managing company assets and human resources; strategic planning; project management; compiling audit trails and other reporting tools; maintaining records relating to business activities, budgeting, and financial management; and managing mergers, acquisitions, sales, reorganizations or disposals, and integration with business partners.

- Complying with legal requirements, such as tax, record-keeping, and reporting obligations; conducting audits, and management and resolution of health and safety matters; complying with requests from government or other public authorities; responding to legal processes such as subpoenas and court orders; pursuing legal rights and remedies; handling pre-litigation, litigation and managing internal complaints or claims; conducting investigations and reviews; and complying with internal policies and procedures.

- Performing services, including maintaining or servicing accounts, providing client service, processing or fulfilling orders and transactions, verifying client information, processing payments, providing analytics services, providing storage, or providing similar services.

- Auditing and testing, including auditing compliance.
- Certain short-term, transient uses.
- Helping to ensure security and integrity.
- Debugging to identify and repair errors that impair existing intended functionality.
- Undertaking internal research for technological development and demonstration.
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance them.

AQR does not collect or process sensitive personal information with the purpose of inferring characteristics about Covered Individuals.

To the extent we process deidentified information, we will maintain and use the information in deidentified form and will not attempt to reidentify the information unless permitted by applicable law.

Retention of 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.

Sources of Personal Information:

During the Term, AQR may have obtained personal information about Covered Individuals from the following categories of sources:

- Directly from you;
- Your devices;
- Family or friends who provide information about you, for example, in connection with our provision of benefits or services;
- Previous employers and recruitment agencies;
- Industry bodies;
- Professional associations;
- Our affiliates and subsidiaries;
- Service providers, contractors, and other vendors who provide services on our behalf;
- Clients or business partners who provide information about you, such as when they provide feedback;
- Internet service providers ("ISPs");
- Operating systems and platforms;
- Government entities;
- Social networks; and
- Data brokers, such as background check services.

Disclosure of Personal Information:

During the Term, AQR may have disclosed the following categories of personal information about you for a business purpose to the following categories of third parties:

Category of Personal Information	**Categories of Third Parties**
Identifiers	• Our affiliates and subsidiaries • Vendors who provide services on our behalf and other counterparties • Visitors to AQR's websites • Operating systems and platforms • Data brokers, such as background check services • Social Networks
Additional Data Subject to Cal. Civ. Code § 1798.80	• Our affiliates and subsidiaries • Vendors who provide services on our behalf and other counterparties • Visitors to AQR's websites • Data brokers, such as background check services • Social Networks
Protected Classifications	• Our affiliates and subsidiaries • Vendors who provide services on our behalf and other counterparties • Operating systems and platforms • Data brokers, such as background check services • Social Networks
Commercial Information	• Our affiliates and subsidiaries • Vendors who provide services on our behalf and other counterparties • Operating systems and platforms • Data brokers, such as background check services
Online Activity	• Our affiliates and subsidiaries • Vendors who provide services on our behalf and other counterparties • Operating systems and platforms • ISPs and operating systems and platforms
Geolocation Data	• Our affiliates and subsidiaries • Operating systems and platforms
Sensory Information	• Our affiliates and subsidiaries • Vendors who provide services on our behalf and other counterparties • Visitors to AQR's websites • Social Networks
Employment Information	• Our affiliates and subsidiaries • Vendors who provide services on our behalf and other counterparties • Visitors to AQR's websites • Operating systems and platforms • Data brokers, such as background check services • Social Networks

Education Information	• Our affiliates and subsidiaries • Vendors who provide services on our behalf and other counterparties • Visitors to AQR's websites • Operating systems and platforms • Data brokers, such as background check services • Social Networks

In addition to the categories of third parties identified above, during the Term, we may have disclosed personal information about Covered Individuals to government entities and third parties (i) to ensure that AQR policies and procedures are being followed; (ii) to ensure the safety, security, and integrity of our workplace and IT systems; (iii) to comply with applicable laws, rules, regulations, subpoenas, requests for information, legal processes, governmental investigations, filing and reporting requirements or other inquiries; (iv) to cooperate with law enforcement, regulatory, or self-regulatory organizations; and (v) to assert or defend legal claims.

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.

We do not "sell" or "share" for cross-context behavior advertising purposes (as such terms are defined in the CCPA) any personal information about Covered Individuals.

Your Rights Under the CCPA:

If you are a Covered Individual, you have certain choices regarding your personal information, as described below.

Access Rights: You have the right to request, twice in a 12-month period, that we disclose to you the categories of personal information we have collected about you, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you.

Deletion Rights: You have the right to request that we delete any personal information that we have collected from you, subject to certain statutory exceptions.

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

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

How to Exercise Your Rights: To exercise any of your rights under the CCPA, or to access this Policy in an alternative format, please submit a request on your behalf using either of the methods set forth in the *"Contact Us"* section below. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.

Contact Us:

For any requests relating to the exercise of your rights under the CCPA, 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 CCPA and to 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 request (*e.g.*, the risk of responding to a fraudulent or malicious request), we may request further information to verify your request. For example, we may require you to authenticate your email address and/or provide information about your employment dates with AQR, prior payments from AQR, prior correspondence with AQR, or other details about your work for or relationship to AQR. To submit a request as an authorized agent on behalf of a Covered Individual, please email us at privacy@aqr.com.

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