

## Candidate Privacy Statement

Last Updated: October 14, 2020

### 1. Introduction

This Candidate Privacy Statement (“Privacy Statement”) describes Ares Management LLC’s and its affiliates’ and subsidiaries’ (collectively, “Ares”, “we” or “our”) personal information practices with respect to employment candidates (“Candidates”). The Privacy Statement describes what personal information Ares collects and how it collects, uses, discloses or otherwise processes information about Candidates. This Privacy Statement also describes your ability to control certain uses of your personal information. Please read this Privacy Statement carefully before using the Candidate portal (“Site”). By using the Site, you acknowledge and agree to the practices described in this Privacy Statement.

Ares operates globally and special provisions for certain jurisdictions are set forth at the end of this Privacy Statement.

This Privacy Statement does not form part of your application or any contract of employment.

### 2. INFORMATION COLLECTION

#### A. What information we collect about Candidates

Before, during and after your application to Ares, including time spent on the Site, we may collect and process information about you. We may collect the following information about you, to the extent permissible under applicable law:

- **Personal details:** Name, home contact details (email, phone numbers, physical address) languages(s) spoken, gender, date of birth, national identification number, Social Security number, driver’s license information, accommodation requests, emergency contact information and photograph;
- **Account information:** Username and password;
- **Documentation required under immigration laws:** Citizenship and passport data, details of residency or work permit;
- **Talent management information:** Details contained in letters of application and resume/CV (previous employment background, education history, professional qualifications and memberships (such as licenses, and permits), language and other relevant skills, certification, certification expiration dates), writing samples, information necessary to complete a background check (including drug/alcohol) and information received during these checks, information relating to references such as referees’ names and contact details, details on performance management ratings, development programs planned and attended, e-learning programs, performance and development reviews, willingness to relocate, and information used to populate employee biographies;
- **Any other information:** Such as current salary, desired salary, employment preferences, references, whether you are subject to prior employer obligations, information from job application materials (for example, your cover letter, references, work history, education transcripts; and
- **Sensitive information:** Such as information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data or biometric data for the purpose of uniquely identifying a natural person, data concerning health (including information needed to understand and assess accommodation requests regarding potential disabilities or other health conditions) or data concerning a person’s sex life or sexual orientation, and criminal conviction data.

We ask that you avoid submitting sensitive information, unless such information is legally required and/or Ares requests you to submit such information.

Any information you submit through the Site must be true, complete and not misleading. Submitting inaccurate, incomplete or misleading information may lead to a rejection of your application during the recruitment process or disciplinary action including immediate termination of your employment. In addition, it is your responsibility to ensure that the information you submit does not violate any third party’s rights.

If you provide us with personal information of a referee or any other individual as part of your application, it is your responsibility to obtain consent from that individual prior to providing the information to us.

In certain cases, we may ask you for additional information for purposes of complying with applicable laws.

## **B. Sources of Information**

Where permitted by governing law, we may collect information from the following sources:

- **Candidates:** in person, online, by telephone or in written correspondence and forms;
- **Third-party and Ares websites:** where you can apply for jobs at Ares;
- **Previous employers and other referees:** in the form of employment references;
- **Educational establishments:** in the form of education references;
- **Background and credit check vendors:** as part of the recruitment process;
- **Employment agencies, recruiters and other persons acting on your behalf;**
- **Providers of sanctions and “politically exposed persons” screening lists;**
- **Ares personnel;**
- **Publicly accessible sources:** for example, tax codes from applicable tax authorities, through job search or career networking sites or social media profiles; and
- **Automatic data collection tools:** for example, cookies and other similar technologies when you use the Site. To learn more about these cookies and other technologies, please see the Cookie section below.

If you are a recruiter or other person submitting an application, resume or CV for consideration on behalf of a person who is interested in a position posted on our Site, please ensure that you have provided the applicant with a copy of this Privacy Statement, that you are authorized to submit their personal information to us, and you obtain any consent to information collection and use as set out in this Privacy Statement.

If you provide us with details of referees, you confirm that your referees have consented to our collection, use and disclosure (including transfers to other countries as described in this Privacy Statement) of their personal information for the purposes of contacting them as referees, and being contacted by us in connection with your application.

## **3. INFORMATION USE AND DISCLOSURE**

### **A. Why we collect your information**

We may use your personal information to manage and facilitate the recruitment process or as otherwise described when you provide your information (or when information is provided on your behalf), as described more fully below:

- **Managing workforce:** Managing recruitment and assessing your suitability, capabilities and qualifications for a job with us, processing your application and performing background checks if we offer you a job, such as credit checks, anti-fraud checks and checks to prevent fraud and money laundering, enabling us to conduct our business, managing IT systems and infrastructure, analysing and improving our application and recruitment processes, accommodating disabilities or health conditions, and providing you with customized content;
- **Operating the Site:** Operating the Site and any other site to which this Privacy Statement is posted;
- **Communications:** Facilitating communication with you regarding your application;
- **Taking legal action:** Pursuing legal rights and remedies, defending litigation and managing any internal complaints or claims, conducting investigations and complying with internal policies and procedures, complying

with internal policies and procedures, protecting our, your or others' rights, safety and property, investigating and deterring against fraudulent, harmful, unauthorized, unethical or illegal activity, and other business operations;

- **Compliance:** Complying with legal (including, in respect of sensitive information, obligations under employment law) and other requirements, such as record-keeping and reporting obligations, conducting audits, compliance with government inspections and other requests from government or other public authorities, responding to legal process such as subpoenas, sharing information with government authorities, law enforcement and private parties where we have a good-faith belief it is necessary; and
- **Analytics:** Creating anonymous, aggregated or de-identified data that we use and share to analyse our application and recruitment activities, business and for other lawful business purposes.

We may use your information for other business operations. There may be more than one purpose that justifies our use of your information in any particular circumstances. We will only use your information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so. If you fail to provide certain information when requested, we may not be able to review your application or we may be prevented from complying with our legal obligations.

If we think you are suitable for any current vacancies or other opportunities, we will use your information to assess your suitability for roles you may be interested in and to inform you about these vacancies or opportunities. If you submit a resume or CV through the Site or confirm your interest in an opportunity we may keep you informed by email as to the progress of your application and will use your information to manage the recruitment process.

For certain positions, it will be necessary for us to verify the details you have supplied (for example, in relation to your academic credentials or your employment history) and/or carry out pre-employment checks in the event that we extend an employment offer (for example, in relation to previous criminal convictions). If a position that is or may be of interest to you requires pre-employment vetting, we will tell you about this. Such vetting will not usually occur unless and until an offer has been made. We will carry out background checks only where permitted by law or, where applicable, with your consent.

Some information we collect is required in order for you to use the Site and/or apply for a role with us. We may also require personal information to comply with legal or contractual obligations and the provision of such information is mandatory. If such information is not provided, please note that we will not be able to process your application or maintain our relationship with you, as applicable.

## **B. To whom we disclose your information**

We may disclose your personal information to:

- **Corporate affiliates**, such as entities that are a holding company or a subsidiary of Ares, or a subsidiary of Ares' holding company (or a company managed or operated by any such holding company or subsidiary on a worldwide basis, including to our affiliate, Ares Management LLC, in the United States (all such entities being the "**Ares Group**"), for purposes set out in this Privacy Statement, including recruitment and human resource management purposes, for the purposes of compliance with applicable laws and regulations, IT support and, if you consent, we may send your information to them if we believe they have job vacancies for which you may be eligible or which may be of interest to you;
- **Service providers**, these are entities or people that provide products and services to Ares such as human resources services (including, without limitation, Workday located in the United States, so that they can perform a business, professional or technical support function for us, including hosting the Site in the United States and related services, customizing your use of the Site based on your viewing patterns and areas of interest and verifying the status of your account), IT systems suppliers and support, background and credit check providers, recruiters and headhunters, and hosting service providers;
- **Governmental authorities, law enforcement and others:** Entities that regulate or have jurisdiction over Ares such as regulatory authorities, law enforcement bodies, public bodies, and judicial bodies, including to meet national security or law enforcement requirements.
- **Professional advisors:** Lawyers, immigration advisors and other outside professional advisors.

- **Private parties:** For the purposes specified in this Privacy Statement such as to comply with legal process;
- **Business transferees:** We may sell or purchase assets during the normal course of our business. If another entity acquires us or any of our assets, information we have collected about you may be transferred to such entity. In addition, if any bankruptcy or reorganization proceeding is brought by or against us, such information will be considered our asset and may be sold or transferred to third parties. Should such a sale or transfer occur, we will use reasonable efforts to require that the transferee use your personal information in a manner that is consistent with this Privacy Statement.
- **Customers and business partners:** Customers, other companies and individuals with whom Ares does business or is exploring a business relationship.

#### 4. INTERNATIONAL DATA TRANSFER

Ares may transfer your personal information to the United States and to other countries throughout the world that are not your country or jurisdiction of residence. The countries to which your information will be transferred may not have equivalent data protection laws to that which applies in your own country or jurisdiction. Your personal information will be stored and processed manually and electronically through global systems and tools for the purposes specified in this Privacy Statement.

#### 5. INFORMATION RETENTION

Ares's retention periods for information collected under this Privacy Statement are based on business needs and legal requirements. We retain information for as long as is necessary for the processing purpose(s) for which we collected the information, as set out in this Privacy Statement, and any other permissible, related purposes. Unless instructed otherwise or required by applicable law, we will retain information you have supplied to us for the purposes specified in this Privacy Statement including, without limitation, in order to contact you (including by email) about other suitable vacancies and opportunities which may become available from time to time. Details about successful applicants will be transferred to their employment files and information regarding retention periods will be shared with you at the point of employment, if applicable.

#### 6. INFORMATION SECURITY

We implemented and maintain technical, administrative, physical and procedural security measures, consistent with local and international information practices designed to protect your personal information from misuse, unauthorized access or disclosure, loss alteration or destruction.

Because there is always some risk in transmitting information over the Internet, while we make every effort to help ensure the integrity and security of our network and systems, we cannot guarantee our security measures. Users of this Site are required to keep their password confidential as a loss of such password may lead to third party individuals accessing and amending data without their consent, for which we cannot be held liable.

#### 7. COOKIES

We collect information relating to whether you have accessed this Site before and the time of your last visit. We accomplish this through cookies placed on your computer.

##### ***What are cookies?***

A cookie is a piece of information that a website stores on a user's computer, and that the user's browser provides to the website each time the user submits a query to the website using that browser.

When you access the Site, we place cookies on your computer. A cookie allows us to determine that a visit has occurred within the Site, as well as which pages were viewed. Through cookies, we collect the following information about your session.

- Your Internet Protocol ("IP") address
- The language/local code for the language selected by the user
- Operating system and browser type

- The time zone of the user accessing the page
- Whether a session is a shared session
- The server ID for the particular session for purposes of distributing traffic amongst servers

### ***How can I manage cookies?***

You can decide if and how your computer will accept cookies by configuring the preferences option within your web browser, using the instructions provided in your browser. If you choose to decline cookies, however, some of the functionality of this Site might be impaired.

### ***How does Ares use cookies with the Site?***

We use the information collected through cookies to see how users move around the Site, see which pages you view, information you search for, the average time spent on the Site and statistical information about visits to the Site in order to better understand our audience and its interests, and to increase the functionality and user- friendliness of our site. You can find more information about cookies and how to manage them at <http://www.allaboutcookies.org/>.

The cookies on the Site are essential and required for the application to work. The Site uses the following categories of cookies:

- Always-set cookies that are strictly necessary for the Site to function and that expire with the session.
- Session cookies, such as “PLAY\_LANG”, “PLAY\_SESSION” and “timezoneOffset” used to provide the user with a consistent session.
- Load-balancer cookies such as “wday\_vps\_cookie” and “WorkdayLB\_VPS” which are used to ensure a single session is handled by the same server so that the user isn’t inadvertently logged out.
- Third-party cookies, such as LinkedIn, where the Apply with LinkedIn, or similar, is used.

JSESSIONID is the http session ID cookie used to identify the session. This cookie is opt-in with the LinkedIn Quick Apply feature and expires at the end of the user session.

## **8. LINKS TO OTHER SITES OR APPS OR THIRD PARTY SERVICES**

Where this Site has links to third-party sites or applications, such sites may have privacy policies that differ from our own. When you use these links you will leave our website and enter sites we have no control over. This Privacy Statement does not cover your use of these sites or govern the personal information which you may provide. We are not responsible for the practices of such sites or applications. To protect your privacy, we suggest that you review the individual privacy statement on any third party website before using the site or submitting any personal information. This Privacy Statement does not address, and we are not responsible for, the practices of any third parties, which may have their own rules for how they collect and use your information.

## **9. CHILDREN**

This Site is not intended for minors under the age of 16.

## **10. YOUR CHOICES**

In certain circumstances, you may exercise choices in relation to the information we hold about you. We set out below an outline of these choices and how to exercise them. Please note that for each of the choices below, we may have valid legal reasons to refuse your request, in such instances we will let you know if that is the case. If you want more detail on when the choices apply, please contact [AresPrivacy@aresmgmt.com](mailto:AresPrivacy@aresmgmt.com).

### **A. Deleting Your Information**

When you deactivate your account, we will still store your data on our Site. To delete your data, please email us at [AresPrivacy@aresmgmt.com](mailto:AresPrivacy@aresmgmt.com). We reserve the right to retain your data for the time periods set out in this Privacy Statement.

## **B. Objection to Marketing**

At any time you may object to our processing of information about you in order to send you information about roles that we think you may be interested in, including where we build profiles for such purposes and we will stop processing the data for that purpose. If you no longer wish to receive any updates from us regarding new job opportunities and vacancies, you should contact [HROperations@aresmgmt.com](mailto:HROperations@aresmgmt.com).

## **C. Complaints**

In the event that you wish to make a complaint about how we process your personal data, please contact us in the first instance at [AresPrivacy@aresmgmt.com](mailto:AresPrivacy@aresmgmt.com). We will promptly take all reasonable steps to investigate any complaints or requests in relation to personal information.

## **D. Do Not Track**

Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” or similar signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

## **E. Choosing Not to Share Your Information**

Where we are required by law to collect your information or where we need your information in order to consider your candidacy, if you do not provide this information when requested (or you alter ask to delete it), we may not be able to consider your candidacy. We will tell you what information you must provide at the time of collection or through other appropriate means.

## **11. IF YOU HAVE QUESTIONS**

If you have any questions about this Privacy Statement or the practices described herein, you can contact us at [AresPrivacy@aresmgmt.com](mailto:AresPrivacy@aresmgmt.com).

## **12. REVISIONS TO THIS PRIVACY STATEMENT**

We reserve the right to revise this Privacy Statement at any time. If we do so, we will post such change(s) on the Site. Please check back frequently to see any updates or changes to this Privacy Statement. Any changes will become effective when we post the revised notice on our Site or as otherwise indicated.

## **13. NOTICE TO EUROPEAN RESIDENT CANDIDATES**

### **A. General**

The information provided in this “Notice to European Residents Who Are Candidates” section applies only to individuals in the European Union, United Kingdom and Switzerland (collectively, “Europe” or “European”). References to “personal information” or “information” in this Privacy Statement are equivalent to “personal data” governed by European data protection laws.

### **B. Controller and Data Privacy Contact**

Ares Management Limited (“Ares Management Limited”), a company incorporated in England & Wales, with registered number 05837428 with registered address 5th Floor, 6 St. Andrew Street, London, EC4A 3AE, is the data controller. For questions or concerns related to your personal data, please contact Ares Human Resources at:

E-mail: [HROperations@aresmgmt.com](mailto:HROperations@aresmgmt.com)

Phone: +44 20 7434 6437

Post: 10 New Burlington Street, 6th Floor

London | WIS 3BE | UK

For data privacy inquiries and any questions or concerns you have about this Privacy Statement, please contact our data privacy contact at:

E-mail: [AresPrivacy@aresmgmt.com](mailto:AresPrivacy@aresmgmt.com)

Phone: +44 20 7434 6471

Post: 10 New Burlington Street, 6th Floor

London | W1S 3BE | UK

### C. Legal Bases for Processing

We may use your personal information only as permitted by law. Our legal bases for processing the personal information described in this Privacy Statement are described in the table below.

Processing purpose ( <a href="#">click link for details</a> )	Legal basis
<i>Details regarding each processing purpose listed below are provided in the section above titled "Information Use and Disclosure".</i>	
<ul style="list-style-type: none"><li>• <b>Managing workforce</b></li><li>• <b>Operating the Site</b></li><li>• <b>Communications</b></li><li>• <b>Taking legal action</b></li><li>• <b>Analytics</b></li></ul>	These activities constitute our legitimate interests. We do not use your personal information for these activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
<b>Compliance</b>	Processing is necessary to comply with our legal obligations.
<b>With your consent</b>	Processing is based on your consent. Where we rely on your consent you have the right to withdraw it any time in the manner indicated when you consent or otherwise instructed.

In particular, we may use your sensitive information, such as health/medical information, in order to accommodate a disability or illness during the recruitment process, your diversity-related information (such as race or ethnicity) in order to comply with legal obligations relating to diversity and anti-discrimination, and your criminal conviction data only where it is appropriate (given the role for which you are applying) and we are legally able to do so.

### D. International Data Transfers

Intra-group transfers among Ares entities outside of Europe are based on standard contractual clauses for the transfer of personal data from Europe to third countries which do not ensure an adequate level of data protection, approved by the European Commission pursuant to Decision 2004/915/EC. For transfers to third party service providers outside Europe, these recipients are required to execute the standard contractual clauses, approved by the European Commission pursuant to decision 2010/87/EC. You have a right to ask us for a copy of the standard contractual clauses and may do so by contacting us at [AresPrivacy@aresmgmt.com](mailto:AresPrivacy@aresmgmt.com).

### E. Automated Decisions

Ares does not envisage that you will be subject to decisions that will have a significant impact on you based solely on automated decision making.

### F. Your Rights

In certain circumstances, you have rights in relation to the personal information we collect about you. We set out below an outline of those rights and how to exercise them.

- **Access and portability:** You have the right to know whether we process personal information about you, and if we do, to access information we hold about you and certain information about how we use it and with whom we share it. You also have the right to receive the information you have provided to Ares in a structured, commonly used and machine-readable format for onward transmission.
- **Correction, erasure and restriction of processing:** You have the right to require us to correct any personal information held about you that is inaccurate and have incomplete information completed or ask us to delete information (i) where you believe it is no longer necessary for us to hold the personal information; (ii) where we are processing your information on the basis of our legitimate interest and you object to such processing; or (iii) if you believe the personal information we hold about you is being unlawfully processed by us. You can ask us to restrict processing information we hold about you other than for storage purposes if you believe the personal information is not accurate (whilst we verify accuracy); where we no longer need the personal information for the purposes of the processing but you require us to retain the information for the establishment, exercise or defence of legal claims; or where you have objected to us processing personal information and we are considering your objection.
- **Objection:** You have the right to object to our processing of information about you based on legitimate interests and any automated decision-making and we will consider your request. Please provide us with detail as to your reasoning so that we can assess whether there is a compelling overriding interest in us continuing to process such information or we need to process it in relation to legal claims.
- **Complaints:** In the event that you wish to make a complaint about how we process your personal information, please contact us in the first instance at [AresPrivacy@aresmgmt.com](mailto:AresPrivacy@aresmgmt.com) and we will endeavour to deal with your request. This is without prejudice to your right to raise a complaint with a relevant supervisory authority.

You may exercise the rights set out at above by emailing [AresPrivacy@aresmgmt.com](mailto:AresPrivacy@aresmgmt.com). Please note that we will require you to verify your identity before responding to any requests to exercise your rights by providing suitable forms of identification, which are given below. Ares requires 2 pieces of ID, 1 from list A and 1 from list B, as below:

List A	List B
Valid Passport	Recent utility bill showing data subject's current home address (no more than 3 months' old)
Valid Photo Driving Licence	Recent Bank or Building Society Statement (no more than 3 months' old)

Please note that for each of the rights above we may have valid legal reasons to refuse your request, in such instances we will let you know if that is the case. If you want more detail on when the rights apply, please contact [AresPrivacy@aresmgmt.com](mailto:AresPrivacy@aresmgmt.com). You also can file a complaint with your local data protection supervisory authority. Please contact [AresPrivacy@aresmgmt.com](mailto:AresPrivacy@aresmgmt.com) for details of the relevant authority.

You can withdraw your consent at any time by sending an e-mail to [AresPrivacy@aresmgmt.com](mailto:AresPrivacy@aresmgmt.com) or [HROperations@aresmgmt.com](mailto:HROperations@aresmgmt.com).

## 14. NOTICE TO CALIFORNIA RESIDENT CANDIDATES

### A. General

The information provided in this "Notice to California Residents Who Are Candidates" section applies only to California residents. For purposes of this Privacy Statement, "personal information" or "information" has the meaning given in the California Consumer Privacy Act of 2018 (the "CCPA") but excludes information exempted from the CCPA's scope.

### B. If you have questions



You may contact Ares at:

E-mail: [HROperations@aresmgmt.com](mailto:HROperations@aresmgmt.com)  
Phone: (310) 201-4100  
Address: 2000 Avenue of the Stars, 12<sup>th</sup> Floor  
Los Angeles, CA 90067

For all data privacy inquiries and any questions or concerns you have about this Privacy Statement, please contact our data privacy contact at:

E-mail: [Aresprivacy@aresmgmt.com](mailto:Aresprivacy@aresmgmt.com)  
Phone: (310) 201-4100  
Address: 2000 Avenue of the Stars, 12<sup>th</sup> Floor  
Los Angeles, CA 90067