

AQR Global Privacy Policy

Effective Date: February 21, 2018

Last Updated: October 2023

We at AQR Capital Management, LLC, along with our affiliates (collectively, “AQR”), respect your concerns about privacy. This Global Privacy Policy (“Global Privacy Policy”) describes the types of personal information we obtain, how we use that information, to whom we disclose it and the choices available to you regarding our use of the information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices. For the purposes of European Union (“EU”), United Kingdom (“UK”) and Swiss data protection laws, AQR is the data controller of your personal information.

This Global Privacy Policy applies to the privacy practices of AQR with respect to its processing of personal information online through AQR’s websites and mobile applications listed in Appendix A of this Global Privacy Policy or [here](#) (collectively, the “Sites”), as well as our offline privacy practices (unless they are specifically covered by a separate privacy policy).

Our privacy practices may vary among the countries and states in which we operate to reflect local practices and legal requirements. You can view certain country- and state-specific information by clicking [here](#).

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Information We Obtain

We may obtain information about you in various ways, such as through our Sites, subscription documents and other documents and forms we receive from you or on your behalf.

The types of personal information we may obtain include:

- identifiers and contact information (such as name, postal and email address, telephone number, Social Security number, tax ID number, government-issued identification number, and date and place of birth);
- professional and employment information (such as company / institution, and job position / title);
- internet or other electronic network activity information and information used to create your online account (such as username and password);
- commercial information and other information about your transactions with us, our funds, our affiliates or others; and
- other personal information you provide to us or that is obtained from meetings, telephone conversations, and other interactions with you, including other forms and documents you send us or submit via our Sites.

In addition to the information listed above, if you are a job candidate and apply for a position with AQR or create an account to do so, or if we conduct a background check in connection with a job opportunity with AQR, we may collect the following types of personal information (including sensitive personal information) to the extent permitted by applicable law:

- Social Security number, national identifier or other government-issued identification number;
- driver's license details (number and state of issue);
- date and place of birth;
- gender, gender identity and sexual orientation;
- address history;
- employment and education history;
- LinkedIn profile;
- language proficiencies and other work-related skills;
- citizenship and work authorization status (including passport);
- military and veteran status;
- race/ethnicity;
- self-identified disability status;
- results of background checks (civil, criminal, regulatory, credit, etc.);
- proof of COVID-19 vaccination status;
- information provided by references; and



- other information about your qualifications for employment, such as information contained in your résumé or C.V., cover letter and compensation history and related information.

Additionally, for the purposes of recruitment for employment, we may obtain some information from third parties, for example, references from a previous employer or recruitment agencies, or results from a background check company.

Providing personal information to us is voluntary on your part. However, if you choose not to provide us with information we deem to be mandatory, such as where the data is required by law or under the terms of a contract we have with you, we may not be able to offer you certain of our products and services, and you may not be able to access certain features of our Sites.

In connection with operating our business and marketing our products and services, to the extent permitted by applicable law, we may obtain personal information from consumer reporting agencies, our related entities, the responsible entities or administrators of managed investment schemes for which we provide services (“Fund”), regulatory or government authorities, industry bodies, professional associations and other third parties.

Information We Obtain by Automated Means

When you visit our Sites, open our emails or interact with AQR-related tools, widgets or plug-ins, we may obtain certain information by automated means, such as through cookies, web server logs, web beacons and JavaScript. A “cookie” is a text file that websites send to a visitor’s computer or other internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, links web pages or applications to web servers and may be used to transmit information back to a web server.

The information we obtain in this manner may include 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. These technologies help us (1) remember your information so you will not have to re-enter it; (2) track and understand how you use and interact with our products, services and Sites; (3) tailor our products, services and Sites around your preferences; (4) measure the usability of our products, services and Sites and the effectiveness of our communications; (5) to provide you with advertising that is more relevant to you and your interests; and (6) otherwise manage and enhance our products, services and Sites.

Information about our cookie practices, and how to disable the storage of cookies on your device is available in Appendix B of this Global Privacy Policy or [here](#). Please note, however, that without cookies, you may not be able to use all the features of our Sites. To the extent required by



applicable law, we will obtain your consent before collecting information using cookies or similar automated means.

Third-Party Analytics Services

We use third-party web analytics services on the Sites, including Google Analytics, Sitecore and Webtrends. The analytics providers that administer these services use technologies such as cookies, web beacons and web server logs to help us analyze how visitors use the Sites. The information obtained for this purpose (including your IP address and other information collected by automated means) will be disclosed to or collected directly by these third-party service providers, and other relevant third parties who use the information to evaluate use of the Sites. In addition, to the extent permitted by applicable law, we may also use information collected for analytics purposes for marketing purposes such as providing you with advertising that is more relevant to your interests or tracking the effectiveness of our marketing efforts. To learn more about these analytics services and how to opt out (where applicable), please review Appendix B or visit:

- Google Analytics: <https://www.google.com/intl/en/analytics/learn/privacy.html>
- Sitecore: <http://www.sitecore.net/en/legal/privacy-policy>
- Webtrends: www.webtrends.com/terms-policies/privacy/privacy-statement/

We do not track visitors of the Sites over time and across third-party websites to provide targeted advertising and therefore do not respond to Do Not Track (“DNT”) signals.

How We Use the Information We Obtain

We may use and process the personal information we obtain to perform our contract with you, or take steps to form a contract with you, such as to:



- provide and manage our products, services and Sites;
- create, manage and administer accounts you hold with us or with one of our funds; and
- establish and manage your online account with AQR.

We may also use your personal information to pursue our legitimate interests in managing our client relationships, securing and managing our Sites, and running our business and recruitment process efficiently. For example, we process your personal information to:

- communicate with you and respond to your inquiries;
- manage and maintain your accounts with us;
- investigate and manage complaints;
- send you promotional and advertising materials, newsletters and other communications;
- manage career opportunities, including for recruitment purposes (such as processing job applications and conducting background checks in accordance with applicable law), employee onboarding and other human resources purposes;
- perform data analyses (such as market and customer research);
- develop, manage and improve our business, products, services and Sites (such as by enhancing, improving and analyzing our products, services and Sites; developing new products, services, websites and apps; managing our communications; determining and managing the effectiveness of our advertising and marketing; and performing accounting, auditing, billing and reconciliation activities and other internal functions);
- protect against, identify and prevent fraud, copyright infringement, unauthorized use and distribution of protected content and other unlawful activity, claims and liabilities;
- respond to regulatory requests; and
- fulfill other purposes required or authorized by law, including legitimate interests pursued by AQR.

We may also use your personal information when necessary to comply with and enforce applicable legal requirements (such as to verify your identity and conduct identity, credit and background checks for anti-money laundering purposes where you or your related organization are applying for our products or services), relevant industry standards, contractual obligations and our policies and terms (such as this Global Privacy Policy and our [Terms of Use](#)).

Where required by applicable law, we obtain consent to process personal information.

We may also use the personal information we obtain in other ways for which we provide specific notice at the time of collection.

Sensitive Personal Information



Depending on the jurisdiction in which you are located, we may also process your sensitive personal information for the following purposes:

- documentation such as work permits, details of residency, proof of citizenship may be processed to assess and review eligibility to work for AQR in the jurisdiction in which you work. We also process personal information relating to criminal convictions and offenses for anti-money laundering and other regulatory purposes. We process this information where: (i) we have your explicit consent to do so; (ii) it is in the public interest to do so, such as to determine whether an individual has committed an unlawful act or has been involved in dishonesty, malpractice or other serious misconduct; or (iii) we need to process this information to exercise our rights and perform our obligations in connection with your potential employment with AQR;
- information about your health, including any medical condition or disability, to consider whether we need to provide appropriate adjustments during the recruitment process. We may need to process this information to exercise our rights and perform our obligations in connection with your potential employment with AQR;
- your ethnicity, race, gender and gender identity, sexual orientation, veteran or disability status may be used for the collection of statistical data subject to local laws. The provision of this information is optional and we process this information where we have your explicit consent to do so, or where it is in the public interest to do so, such as to ensure meaningful equal opportunity or diversity monitoring and reporting within AQR; and
- any information that is required for us to establish, exercise or defend legal claims.

Information We Disclose

We do not disclose personal information about you, except as described in this Policy. We do not sell your personal information.

We disclose your personal information to our affiliates for the purposes identified in this Global Privacy Policy. We also disclose your personal information to our service providers, sub-contractors and agents who perform services on our behalf based on our instructions. We do not authorize these service providers, sub-contractors or agents to use or disclose the information except as necessary to perform services on our behalf or comply with legal or regulatory requirements. Examples of these service providers include fund administrators and entities that provide web hosting, marketing, analytics and other IT services. In addition, we may disclose your personal information to your authorized representatives.

We may also disclose personal information about our current or former investors: (i) to non-affiliated third parties and to our affiliates for everyday business purposes, such as to process transactions, maintain accounts, respond to court orders and legal investigations, report to credit bureaus or other customary uses in connection with the activities of AQR-related investment partnerships; (ii) to transfer agents, portfolio investments, brokerage firms and the like, in



connection with any investment or disposition; or (iii) to actual and potential portfolio companies and potential co-investors, and each of their respective advisors as necessary to effect or administer a contemplated or completed investment or disposition. In addition, we may disclose your personal information to our professional advisors, such as lawyers and accountants.

We also may disclose information about you: (1) if we are required to do so by law or legal process (such as a court order or subpoena); (2) to law enforcement authorities or other government entities based on a lawful disclosure request; (3) to establish, exercise or defend our legal rights; (4) when we believe disclosure is necessary or appropriate to prevent harm or financial loss; (5) in connection with an investigation of suspected or actual fraudulent or illegal activity; or (6) otherwise with your consent. We reserve the right to transfer personal information we have about you in the event of a potential or actual sale or transfer of all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, spin-off, dissolution or liquidation).

We will obtain your consent to the disclosure of your personal information where required to do so under applicable law.

Data Transfers

We may transfer the personal information we obtain about you to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. To the extent required by applicable law, when we transfer your information to recipients in other countries (such as the United States, United Kingdom, Ireland or Cayman Islands), we will protect that information as described in this Global Privacy Policy.

If you are located in the European Economic Area (“EEA”) or Switzerland, we will comply with applicable legal requirements regarding the provision of appropriate safeguards for the transfer of personal information to recipients in countries for which the European Commission has not issued an adequacy decision. If you are located in the UK, we will comply with applicable legal requirements regarding the provision of appropriate safeguards for the transfer of personal information to recipients in countries for which the Information Commissioner’s Office, or the UK Secretary of State, has not issued an adequacy decision. These safeguards may include entering into the EU or UK approved Standard Contractual Clauses or data transfer agreements with data recipients, as applicable, copies of which may be obtained by contacting us as indicated in the [How to Contact Us](#) section of this Global Privacy Policy.

Your Rights and Choices

We offer you certain choices in connection with the personal information we obtain about you. To update your preferences, ask us to remove your information from our mailing lists or to submit a



request regarding your personal information, please contact us as indicated in the [How To Contact Us](#) section of this Global Privacy Policy. You also can unsubscribe from our marketing mailing lists by following the “Unsubscribe” link in our emails.

To the extent provided by the law of your jurisdiction, you may: (1) request access to the personal information we collect, maintain and disclose about you; (2) request that we correct, amend, erase or restrict the information; or (3) exercise your right to data portability, by contacting us as indicated below. Depending on your location, you may have the right to file a complaint with a government regulator or data protection authority in your country if you are not satisfied with our response. Where applicable and as provided by law, you may withdraw your consent or object at any time to the processing of your personal information on legitimate grounds relating to your particular situation, and we will apply your preferences going forward. To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to your information. To the extent permitted by applicable law, a charge may apply before we provide you with a copy of any of your personal information that we maintain.

Links to Third-Party Websites, Apps and Other Features

Our Sites may provide links to other websites, apps and features for your convenience and information. The providers of the websites, apps and features may use automated means to collect information regarding your use of the Sites and your interactions with the other websites, apps and features. These websites, apps and features may operate independently from us and may have their own privacy notices or policies, which we strongly suggest you review. To the extent that any website, app or feature is not owned or controlled by us, we are not responsible for the content, any use of the website, app or feature, or the privacy practices (including cookie practices) of the website, app or feature.

How We Protect Personal Information

We use safeguards designed to protect the personal information we obtain against unauthorized or unlawful use, disclosure, access, loss, destruction or damage.

Retention of Personal Information

To the extent permitted by applicable law, we retain personal information we obtain about you as long as (1) it is needed for the purposes for which we obtained it, in accordance with the provisions of this Global Privacy Policy or (2) we have another lawful basis for retaining the data beyond the period for which it is necessary to serve the original purpose for collecting the data.

Children's Personal Information



The Sites are designed for a general audience and are not directed to children under the age of 18. We do not knowingly collect or solicit personal information from children under the age of 18 (or such other age as may be specified by applicable law in your jurisdiction) through the Sites without parental consent. If we become aware that we have collected personal information from a child under the age of 18 (or such other age as may be specified by applicable law in your jurisdiction) through the Sites, we will either seek parental consent or promptly delete the information from our records. If you believe that a child under the age of 18 may have provided us with personal information through the Sites, please contact us as specified in the [How to Contact Us](#) section of this Global Privacy Policy (below).

Updates To Our Global Privacy Policy

This Global Privacy Policy may be updated periodically and without prior notice to you to reflect changes in our privacy practices. We will, however, notify you of material changes by posting a notice of the update on our Sites. We will indicate at the top of this Global Privacy Policy when it was most recently updated. This Global Privacy Policy replaces all previous statements of our Global Privacy Policy.

How To Contact Us

If you have any questions or comments about this Global Privacy Policy, or if you would like us to update information we have about you or your preferences or otherwise to exercise your privacy rights, please email us at privacy@aqr.com.

You may also call us toll-free at: 1 (866) 821-0338

You also may write to us at:

North America

AQR Capital Management, LLC
Attn: Privacy, Legal and Compliance
One Greenwich Plaza, Suite 130
Greenwich, CT 06830

EEA

Residents of the EEA may contact us at:

AQR Capital Management (Germany) GmbH
Attn: Privacy, Legal and Compliance
Maximilianstrasse 13



80539 Munich
Germany

UK

Residents of the UK may contact us at:

AQR Capital Management (Europe) LLP
Attn: Privacy, Legal and Compliance
Charles House
5-11 Regent Street
London, SW1Y 4LR, U.K.

If you are contacting us in order to exercise your rights outlined above in the [Your Rights and Choices](#) section, your request must:

- Provide sufficient information that allows us to reasonably verify that you are the person about whom we collected non-public personal information or an authorized representative of such person.
- Describe your request with sufficient detail to allow us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with non-public personal information if we cannot verify your identity or authority to make the request and confirm that the requested personal information relates to you. We will use the information provided in a request solely to verify your identity or authority to make the request.

Local Country and State Addenda

Australia

If you are a resident of Australia, the following Australia-specific provisions apply to our processing of your personal information in lieu of and in addition to the relevant sections of the Global Privacy Policy (the “Australia Addendum”). In the event of a conflict between the provisions of the Global Privacy Policy and the provisions of the Australia Addendum, the provisions of the Australia Addendum will govern.



- You consent to AQR using and disclosing your personal information for the purposes described in our Global Privacy Policy, including to provide you with promotional and advertising communications. You may opt out of receiving promotional communications from us at any time by following the instructions in those communications or emailing us at privacy@aqr.com or write to us at:

AQR Pty Limited
Attn: Privacy, Legal and Compliance
GPO Box 2604
Sydney, NSW 2001

- By providing personal information to us, you consent to and acknowledge that, AQR can transfer personal information to overseas entities in the: USA, the Republic of Ireland, Poland, Canada, Singapore, India, Philippines, Hong Kong, Germany, the United Kingdom and the Cayman Islands. If any overseas recipient breaches the Australian Privacy Principles, you consent to and acknowledge that AQR will not be accountable under the *Privacy Act of 1988* (Cth) and you will not be able to seek redress under the Privacy Act.
- We are authorized to collect tax file numbers by the *Income Tax Assessment Act 1936* (Cth). We collect tax file numbers for the purpose of processing investments in certain AQR products. You are not legally required to provide your tax file number to obtain our products and services but, if you do not, taxation law may require additional deductions to be made from amounts payable to you.
- If we collect personal information that we did not solicit, we will, within a reasonable period after receiving the information, determine whether or not we could have lawfully obtained the information if solicited. If we determine that we could not have lawfully obtained the personal information, we will, as soon as practicable but only if it is lawful and reasonable to do so, destroy the information or ensure that the information is de-identified. If we could have lawfully obtained the information, then Australian Privacy Principles 5 to 13 will apply in relation to the information, as though we had collected the information pursuant to Australian Privacy Principle 3.
- Upon your written request, subject to certain exceptions provided by law, AQR will give you access to your Personal Information. If you believe that the Personal Information that AQR holds about you is not accurate, complete or up to date, you may write to us at privacy@aqr.com. AQR will respond to your requests to access or correct Personal Information within a reasonable time. There is no charge for requesting access to your Personal Information but AQR may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).



- If you have a question regarding our handling of your personal information, including questions concerning the privacy laws of the countries where the overseas entities are based or wish to find out information concerning how to access the personal information held by the overseas entities, or would like to submit a complaint (to which we will respond within 30 business days), please contact us at privacy@aqr.com or write to us at:

AQR Pty Limited
Attn: Privacy, Legal and Compliance
GPO Box 2604
Sydney, NSW 2001

If you are still not satisfied about the way in which we have handled your Personal Information, you can contact the Office of the Australian Information Commissioner at www.oaic.gov.au.

Canada

If you are a resident of Canada, the following Canada-specific provisions apply to our processing of your personal information in lieu of and in addition to the relevant sections of the Global Privacy Policy (the “Canada Addendum”). In the event of a conflict between the provisions of the Global Privacy Policy and the provisions of the Canada Addendum, the provisions of the Canada Addendum will govern.

- References in the Global Privacy Notice and the Canada Addendum to “we”, “us”, “our”, “AQR” and “AQR Capital Management, LLC” are references to AQR Capital Management (Canada), LLC.
- We may collect social insurance numbers on an optional basis for identification purposes, including to help us identify you with credit reporting agencies.
- We will request your consent to obtain your credit report (including credit score) from a credit reporting agency for the purposes of assessing our risks and complying with regulatory requirements. Your credit report may include information such as the types and amounts of credit advanced to you, payment histories, negative banking items, collection actions, legal proceedings, previous bankruptcies and other information reported by your creditors. You authorize credit reporting agencies to provide such information to us.
- We only disclose personal information where permitted or required by applicable law. We will not disclose personal information to affiliated or non-affiliated third parties for marketing purposes or to assess your creditworthiness without your prior consent.



- We and our U.S. and other affiliates and service providers may disclose information about you (i) if we are required or permitted to do so by applicable law or legal process and (ii) to Canadian, U.S. or other law enforcement authorities, courts and other government officials pursuant to a lawful disclosure request.
- If you have questions or concerns regarding our privacy practices or if you would like information regarding our policies and procedures with respect to our service providers outside of Canada, please contact our Privacy Officer, as indicated in the [How To Contact Us](#) section of this Global Privacy Policy.
- Information about our cookie and interest-based advertising practices in Canada is available in Appendix B of this Global Privacy Policy.
- To learn how to opt out of ad network interest-based advertising in Canada, please visit <http://youradchoices.ca/choices>.

Dubai International Financial Centre (“DIFC”)

If you are a resident of, or are working or operating from, the DIFC, the following DIFC-specific provisions apply to our processing of your personal information (hereinafter, the “DIFC Addendum”), in addition to the relevant sections of the Global Privacy Policy. In the event of a conflict between the provisions of the Global Privacy Policy and the provisions of this DIFC Addendum, the provisions of this DIFC Addendum will govern.

The DIFC Data Protection Law 2020 (“DIFC DP Law”) provides DIFC residents (and those operating from the DIFC) with the following additional rights regarding their personal information:

- You have the right to request that we disclose to you, rectify, or erase your personal information. Once we receive your request and verify your identity, we will disclose your personal information to you, or rectify or erase the information, as applicable, unless a legal exception applies. For example, we may deny your deletion request if retaining the information is necessary for us or our service providers to complete the transaction for which we collected the personal information, provide a service that you requested, to take actions reasonably anticipated within the context of our ongoing business relationship with you, to comply with a legal or regulatory duty or to otherwise perform a contract with you.



- You have the right to withdraw, object to, or restrict our collection and use of your personal information. Once we receive your request and verify your identity, we will carry out your request, unless a legal exception applies.

With respect to personal information that we transfer out of (i) the DIFC or (ii) specifically to the UK, or a country within the EEA, we may subsequently transfer such personal information to another country, provided that one or more of the following conditions applies:

- (a) one of the appropriate safeguards is in place under Article 27(2) of the DIFC DP Law 2020;
- (b) the country to which the personal information is transferred ensures an adequate level of protection for your rights and freedoms;
- (c) you have given your consent;
- (d) the transfer is necessary for one of the reasons set out in the Global Privacy Policy or applicable law, including the performance of a contract, or to protect your vital interests;
- (e) the transfer is legally required on important public interest grounds or for the establishment, exercise or defense of legal claims; or
- (f) the transfer is authorized by the relevant data protection authority where we have implemented adequate safeguards with respect to the protection of your privacy, fundamental rights and freedoms, and the exercise of your rights.

Inquiries concerning the personal information collected, including access, deletion and correction requests, should be addressed to privacy@aqr.com.

Hong Kong

If you are a resident of Hong Kong, the following Hong Kong-specific provisions apply to our processing of your personal information in lieu of and in addition to the relevant sections of the Global Privacy Policy (the “Hong Kong Addendum”). In the event of a conflict between the provisions of the Global Privacy Policy and the provisions of the Hong Kong Addendum, the provisions of the Hong Kong Addendum will govern.

- The personal information we collect, whilst voluntarily provided by you, is considered by us to be mandatory to collect in order for us to provide you with the services contemplated under this Global Privacy Policy. If you choose not to provide us with certain information that is mandatory for the purposes described in this Global Privacy Policy, we may not be able to offer you certain of our products and services, and you may not be able to access certain features of our Sites.
- We may use the personal information that we collect about you as described in this Global Privacy Policy for direct marketing purposes, such as to send you promotional materials



and other communications, or to offer products, services or investment opportunities that may interest you. By submitting your personal information to us, you consent to our use of your name and contact details (email address and phone number) for direct marketing purposes. We will not use any of your personal information for direct marketing purposes unless you have consented the use of your personal information for this purpose. To update your preferences, ask us to remove your information from our mailing lists or submit a request regarding your personal information, please contact us as indicated below under *Access to Personal Information* or follow the “unsubscribe” link contained in our emails to you.

- As described in this Global Privacy Policy, we may collect personal information about you from publicly available sources and use the information for the purposes described in this Global Privacy Policy, which may involve purposes beyond those for which the information was originally collected and made publicly available. If you apply to AQR for employment or accept an offer of employment from us, we may also collect personal information about you through employee and applicant monitoring, both in the workplace and outside the workplace, from sources in the public domain, including social media. The purpose of this collection is to determine the suitability of job applicants for positions for which they may have applied; to protect our legitimate interests; and to ensure our employees’ compliance with laws and conduct, appropriate to their position. Inappropriate use of our information systems, or inappropriate postings on social media, may subject employees to disciplinary actions, which may include termination.

Where required by applicable law, we will obtain your consent to our use of publicly available personal information about you for the purposes described in this Global Privacy Policy and the Hong Kong Addendum.

- By submitting your personal information to us, you provide your express, written consent to our collection, use and sharing of the information as described in the Global Privacy Policy and the Hong Kong Addendum.
- *Access to Personal Information.* You have a right to request access to and correction of your personal information in accordance with the Personal Data (Privacy) Ordinance, Cap. 486 of the Laws of Hong Kong. Enquiries concerning the personal information collected, including access and corrections, should be addressed to "Compliance Officer" AQR, Suite 603-5 AIA Central, 1 Connaught Road Central, Central, Hong Kong.

California

This California Consumer Privacy Statement (the “California Supplement”) supplements the AQR Global Privacy Policy (“AQR Privacy Policy”) and applies solely to personal information collected about California consumers, such as our clients, website visitors, business partners and



job applicants. This California Supplement does not apply to personal information collected about AQR employees, partners and contractors.

This California Supplement uses certain terms that have the meaning given to them in the California Consumer Privacy Act of 2018 (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

We may collect (and may have used during the 12-month period prior to the Last Updated date of the AQR Privacy Policy (the “Term”)) the following categories of personal information about you:

- *Identifiers*: Identifiers, including a real name, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers, and similar technology; client account number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, IP address, email address, Social Security number, driver’s license number, passport number and other similar identifiers.
- *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, insurance policy number, bank account number or other financial information, education information, and certain medical information.
- *Protected Classifications*: Protected classification characteristics under California or federal law, including characteristics of protected classifications under California or federal law, such as race, ethnicity, national origin, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, disability, citizenship status and military and veteran status.
- *Commercial Information*: Commercial information, including financial and/or investment records, products or services purchased, obtained or considered, and other purchasing or consuming histories or tendencies.
- *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.
- *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.

We may use (and may have used during the Term) your personal information for the purposes described in the “How We Use the Information We Obtain” section of the AQR Privacy Policy and for the following business purposes:

- Performing services, including maintaining or servicing accounts, providing client service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytics services, providing storage or providing similar services;
- Providing advertising and marketing services;
- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions and auditing compliance;
- Short-term, transient use, such as nonpersonalized advertising shown as part of your current interaction with us;
- Helping to ensure security and integrity;
- Undertaking activities to verify or maintain the quality or safety of our services or devices and to improve, upgrade or enhance them;
- Debugging to identify and repair errors;
- Undertaking internal research for technological development and demonstration;
- Managing career opportunities with us; and
- Managing our relationships with current or prospective partners, corporate customers and vendors and other business partner personnel.

We do not collect or process sensitive personal information for purposes of inferring characteristics about consumers.

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

We will retain your personal information as described in the “Retention of Personal Information” section of the AQR Privacy Policy.

Sources of Personal Information

During the Term, we may have obtained personal information about you from the following categories of sources:

- Directly from you, such as when you contact us;
- Your devices, such as when you use our services;
- Our affiliates and subsidiaries;
- Service providers, contractors and other vendors who provide services on our behalf;
- Regulatory or government authorities;
- Industry bodies;
- Professional associations;
- Data analytics providers;
- Internet service providers (“ISPs”);
- Operating systems and platforms;
- Social networks;
- Recruiting and talent agencies;
- Job references; and
- Data brokers, such as public databases and background check services.

Disclosure of Personal Information

During the Term, we may have disclosed the following categories of personal information about you for the business purposes listed above to the following categories of third parties:

Category of Personal Information	Categories of Third Parties
Identifiers	<ul style="list-style-type: none">• Our affiliates and subsidiaries• Vendors who provide services on our behalf and other counterparties



Category of Personal Information	Categories of Third Parties
	<ul style="list-style-type: none"> • Data brokers, such as background check services • Operating systems and platforms
Additional Data Subject to Cal. Civ. Code § 1798.80	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf and other counterparties • Data brokers, such as background check services • Operating systems and platforms
Protected Classifications	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf and other counterparties • Data brokers, such as background check services • Operating systems and platforms
Commercial Information	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf and other counterparties and other counterparties • Data brokers, such as background check services • Operating systems and platforms
Online Activity	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf and other counterparties • ISPs and operating systems and platforms • Operating systems and platforms
Sensory Information	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf and other counterparties
Employment Information	<ul style="list-style-type: none"> • Our affiliates and subsidiaries • Vendors who provide services on our behalf and other counterparties



Category of Personal Information	Categories of Third Parties
	<ul style="list-style-type: none">• Data brokers, such as background check services• Operating systems and platforms
Education Information	<ul style="list-style-type: none">• Our affiliates and subsidiaries• Vendors who provide services on our behalf and other counterparties• Data brokers, such as background check services• Operating systems and platforms

In addition to the categories of third parties identified above, during the Term, we may have disclosed personal information about you 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 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 do not sell your personal information or share your personal information for cross-context behavioral advertising purposes.

California Consumer Privacy Rights

You have certain choices regarding your personal information, as described below.

- *Access:* 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.
- *Correction:* You have the right to request that we correct the personal information we maintain about you if that information is inaccurate.
- *Deletion:* You have the right to request that we delete certain personal information we have collected from you, subject to certain statutory exceptions.

How to Submit a Request. To submit an access, correction or deletion request, please contact us



at privacy@aqr.com or 1 (866) 821-0338. To submit a request on behalf of a consumer as an authorized agent, please email us at privacy@aqr.com.

Verifying Requests. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. We may require you to verify your postal address, email address or phone number in our records and/or provide information regarding your last interaction with AQR.

In addition, if you ask us to provide you with specific pieces of personal information, we may require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request.

Additional Information. If you choose to exercise any of your rights under the CCPA, you have the right to not receive discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request.

Appendix A

This Global Privacy Policy applies to AQR's online processing of personal information through the following websites and mobile apps:

<https://www.aqr.com/>

<https://australia.aqr.com/>

<https://ucits.aqr.com/>

<http://services.aqr.com>



Appendix B

AQR: Cookie Notice

We at AQR Capital Management, LLC, along with our affiliates (collectively, “AQR”), respect your concerns about privacy. This Cookie Notice applies to the AQR websites listed [here](#) (collectively, the “Sites”).

Our Sites use cookies, web beacons and similar technologies (collectively, “cookies”) to function effectively. A “cookie” is a text file that websites send to a visitor’s computer or other Internet-connected device to uniquely identify the visitor’s browser or to store information or settings in the browser. A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, links web pages or applications to web servers and may be used to transmit information back to a web server.

This Cookie Notice provides you with information about the cookies used on our Sites, their purpose and the choices you can make with regard to the use of cookies.

Cookies used on our Sites

- **Essential cookies**

Some cookies are essential for our Sites to function effectively and to offer our products and services. For example, essential cookies enable you to securely access and navigate within our Sites and to log in. Essential cookies help us understand information, such as your session ID and other server authentication information. Essential cookies are required to enable basic website functionality; you cannot disable essential cookies.

- **Targeted Advertising cookies**

These cookies allow our Sites to deliver advertising that is more relevant to you and your interests. They may also be used to limit the number of times you see an advertisement and measure the effectiveness of advertising campaigns. They may be set by us or by third-party providers whose services we have added to our website.

- **Personalisation cookies**

These cookies allow our Sites to remember the choices you make, such as your username, language or the region you are in, and provide enhanced, more personalised features.

- **Analytics cookies**

Our Sites may use third-party analytics cookies, for example, to help create reports and statistics



on the performance of our Websites, how visitors interact with the Site and whether there may be technical issues. Analytics cookies help us understand information such as device ID, IP address, browser type, operating system, referring URLs, time and date of activity, actions taken on our Websites (including site searches), language preferences, city and country information and demographic data.

A list of the cookies we use across our Sites can be found by navigating to the “Cookie Settings” link (in the “My AQR” section in the bottom toolbar of our Sites) and then following links to the “View Cookies” links under the relevant categories.

Your Choices

You can change your cookie preferences at any time by clicking on the “Cookie Settings” link in the “My AQR” section in the bottom toolbar on certain of our Sites. You can then adjust the available sliders to “on” or “off” and click “Save”. You may need to refresh your page for your settings to take effect.

Alternatively, you may be able to stop cookies from being downloaded on your computer by selecting the appropriate settings on your web browser. Most web browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie and how to disable existing cookies. On Microsoft Internet Explorer, this can be done by selecting “Tools/Internet Options” and reviewing your privacy settings or selecting “delete cookies.” You can find out how to do this for your particular browser by clicking “help” on your browser’s menu or by visiting www.allaboutcookies.org or www.aboutcookies.org. Please note, however, that without certain cookies, you may not be able to take full advantage of all features on our Sites.

The following external links will explain how to manage cookies for the most common browsers:

- Internet Explorer - <https://support.microsoft.com/en-gb/windows/delete-and-manage-cookies-168dab11-0753-043d-7c16-ed5947fc64d>
- Microsoft Edge - <https://support.microsoft.com/en-gb/windows/microsoft-edge-browsing-data-and-privacy-bb8174ba-9d73-dcf2-9b4a-c582b4e640dd>
- Google Chrome - <https://support.google.com/accounts/answer/61416?co=GENIE.Platform%3DDesktop&hl=en>
- Firefox - <https://support.mozilla.org/en-US/kb/enhanced-tracking-protection-firefox-desktop?redirectslug=enable-and-disable-cookies-website-preferences&redirectlocale=en-US>



- Safari - <https://support.apple.com/en-gb/safari>

In addition to the browser-based controls, you can manage third party cookies by visiting aboutads.info/choices/ and youronlinechoices.eu/.

Contact Us

If you have any questions or comments about this Cookie Notice, please email us at: privacy@agr.com.

For more information on how AQR processes personal information, please read our Global Privacy Policy.