

## APPENDIX B

### JURISDICTION SPECIFIC PROVISIONS

#### I. United States Residents

This section applies solely to individuals who reside in a state within the United States that currently has a comprehensive data privacy law in effect (for example, including but not limited to California, Colorado, Connecticut, Montana, Oregon, Texas, Utah or Virginia) (the "US Privacy Law States"). If you have any questions about the information provided in this privacy statement or our privacy practices, please contact us at [privacy@vialto.com](mailto:privacy@vialto.com).

#### **Our processing activities**

##### **a. Business contacts**

We collect and process, and have collected and processed within the last twelve (12) months, the categories of personal data of our business contacts set forth in the "Business contacts" section of Appendix A. Please refer to the "Business contacts" section of Appendix A for further details about the personal data we collect and process in these categories, the sources of such information and the purposes for which the information is or was collected and processed. For information on the categories of third parties with whom we disclose such information in order to conduct our day-to-day business operations, please refer to the "Transfers and disclosures of personal data" section of this privacy statement.

##### **b. Clients and individuals associated with our clients**

In the provision of services to our clients, we may process personal data of such clients and of individuals associated with such clients. As noted in this privacy statement, our policy is to collect only the personal data necessary for agreed purposes and we ask our clients only to share personal data with us when it is needed for those purposes.

When we need to process personal data to provide our services, we ask our clients to provide the necessary information to data subjects concerned regarding its use. We may also make this privacy statement directly available to data subjects when we are engaging directly with said data subjects, such as is the case with our private clients.

Given the diversity of services we provide to our clients, in connection with such services we collect and process, or may have collected and processed within

the last twelve (12) months, the categories of personal data set forth in the “Clients and individuals associated with our clients” section of Appendix A. Please refer to the “Clients and individuals associated with our clients” section of Appendix A for further details about the personal data we collect and process in these categories, the sources of such information and the purposes for which the information was collected and processed. For information on the categories of third parties with whom we disclose such information in order to conduct our day-to-day business operations, please refer to the “Transfers and disclosures of personal data” section of this privacy statement.

### **c. Users of our websites and applications**

We provide external users access to various Websites and applications managed by us. While certain Websites or applications may incorporate or refer back to this privacy statement, please note that such Websites or applications may instead contain their own privacy statements and/or terms and conditions explaining why and how personal data is collected and processed by those applications that differ from this privacy statement. Please refer to the relevant privacy statement for the applicable Website or application for information on the collection and processing of your personal data in relation to your use of such Website or application and the rights you may have in connection with our processing of your personal data.

Where certain Websites or applications incorporate or refer back to this privacy statement, please refer to the relevant section of this Appendix B, Clause I (United States Residents) that is applicable to your relationship with us in connection with your use of the Website or application

### **d. Individuals whose personal data we obtain in connection with providing professional services to our clients (i.e., client assignees)**

In the provision of services to client assignees, we may process personal data of such client assignees and of individuals associated with such client assignees. As noted in this privacy statement, our policy is to collect only the personal data necessary for agreed purposes and we ask our client assignees to only share personal data with us when it is needed for those purposes.

Given the diversity of services we provide to our client assignees, in connection with such services we collect and process, or may have collected and processed within the last twelve (12) months, the categories of personal data set forth in the “Individuals whose personal data we obtain in connection with providing professional services to our clients (i.e., client assignees)” section of Appendix A. Please refer to the “Individuals whose personal data we obtain in connection with providing professional services to our clients (i.e., client

assignees)” section of Appendix A for further details about the personal data we collect and process in these categories, the sources of such information and the purposes for which the information was collected and processed. For information on the categories of third parties with whom we disclose such information in order to conduct our day-to-day business operations, please refer to the “Transfers and disclosures of personal data” section of this privacy statement.

**e. Suppliers (including subcontractors and individuals associated with our suppliers and subcontractors)**

We collect and process, and have collected and processed within the last twelve (12) months, the categories of personal data of our suppliers set forth in the “Suppliers (including subcontractors and individuals associated with our suppliers and subcontractors)” section of Appendix A. Please refer to the “Suppliers (including subcontractors and individuals associated with our suppliers and subcontractors)” section of Appendix A for further details about the personal data we collect and process in these categories, the sources of such information and the purposes for which the information is or was collected and processed. For information on the categories of third parties with whom we disclose such information in order to conduct our day-to-day business operations, please refer to the “Transfers and disclosures of personal data” section of this privacy statement.

**f. Personnel**

Please refer to the relevant privacy statement available on Vialto Partners’ intranet for information on the collection and processing of your personal data in relation to your role with Vialto Partners and the rights you may have in connection with our processing of your personal data.

**g. Sourcing and recruitment of candidates**

Please refer to the separate privacy statements presented to you during the recruitment and, if applicable, onboarding processes for information on the collection and processing of your personal data and the rights you may have in connection with our processing of your personal data.

**h. Visitors to our offices**

We collect and process, or may have collected and processed within the last twelve (12) months, the categories of personal data of our office visitors as set forth in the “Visitors to our offices” section of Appendix A. Please refer to the “Visitors to our offices” section of Appendix A for further details about the personal data we collect and process in these categories, the sources of such

information and the purposes for which the information was collected and processed. For information on the categories of third parties with whom we share such information in order to conduct our day-to-day business operations, please refer to the "Transfers and disclosures of personal data" section of this privacy statement.

**i. Others who get in touch with us**

We collect or process, or may have collected or processed within the last twelve (12) months, the categories of personal data from individuals who contact us as set forth in the "Others who get in touch with us" section of Appendix A. Please refer to the "Others who get in touch with us" section of Appendix A for further details about the personal data we collect and process in these categories, the sources of such information and the purposes for which the information was collected and processed. For information on the categories of third parties with whom we share such information in order to conduct our day-to-day business operations, please refer to the "Transfers and disclosures of personal data" section of this privacy statement.

**Your privacy rights**

This section describes the rights of residents of US Privacy Law States and explains how to exercise those rights. Please see the "Your legal rights in relation to personal data" section of the privacy statement for information about additional choices you may have regarding your personal information.

**a. Right to know / access**

If you are a resident of a US Privacy Law State, under certain circumstances in accordance with applicable law, you have the right to request that we disclose to you specific details about your personal data that we have collected, used, disclosed and sold (which may for some states, such as California, be limited to the past 12 months) and/or a copy of your personal data.

Once we receive your request, we will acknowledge it and either respond in accordance with law, ask for additional information to verify your identity, clarify the nature of your request, let you know if we need more time, let you know if we need to charge a fee (such as if requests are manifestly unfounded or excessive, in particular because of their repetitive character, taking into account the administrative costs of providing the information or communication or taking the action requested), or we will inform you if we cannot fulfill any part of your request due to an exception under the law. If we know that your request relates to information we process as a "processor" or "service provider" (or similar term as defined under the Applicable Local Law of the US Privacy Law State) to one

of our corporate clients, we will forward your request to the relevant client and cooperate with that client as needed to address your request and/or inform you that your request should be submitted directly to the business on whose behalf we process the information.

**b. Right to delete**

If you are a resident of a US Privacy Law State, under certain circumstances in accordance with applicable law, you may have the right to request that we delete any of your personal data that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your valid verifiable request, we will delete, de-identify or aggregate your personal data and direct our service providers to do so, or we will inform you if we cannot fulfill any part of your request due to an exception under the law. If your request relates to information we process as a “processor” or “service provider” (or similar term as defined under the Applicable Local Law of the US Privacy Law State) to one of our clients, we will inform you that your request should be submitted directly to the business on whose behalf we process the information.

**c. Right to correct**

If you are a resident of a US Privacy Law State, depending on the US Privacy Law State in which you reside, you may, under certain circumstances in accordance with applicable law, have the right to request that we correct inaccuracies in any of your personal data that we maintain.

**d. Right to portability**

If you are a resident of a US Privacy Law State, under certain circumstances in accordance with applicable law, you may have the right to request that we provide a copy of your personal data that we maintain in a portable and, to the extent technically feasible, readily useable format.

**e. Right to opt-out of certain processing**

If you are a resident of a US Privacy Law State, depending on the US Privacy Law State in which you reside, you may, under certain circumstances in accordance with applicable law, have the right to opt-out of certain processing of your personal data. More specifically, depending on the jurisdiction in which you are located, you may have the right to:

- (i) opt-out of the sale of your personal information or the use or sharing of your personal data with third parties for purposes of targeted advertising, profiling or cross-context behavioral advertising; and
- (ii) limit the use and disclosure of your sensitive personal information.

Please contact us at [privacy@vialto.com](mailto:privacy@vialto.com) for information about our practices and how you may exercise your opt-out rights under applicable law.

#### **f. Submitting a request**

To exercise the rights described above, please submit a verifiable request to us at [privacy@vialto.com](mailto:privacy@vialto.com)

The verifiable request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal data or an authorized representative of such person. Please, however, refrain from sending us sensitive personal data.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal data if we cannot verify your identity or authority to make the request and confirm the personal data relates to you. Making a verifiable request does not require you to create an account with us. We will only use personal data provided in a verifiable request to verify the requestor's identity or authority to make the request.

We will respond to your request within a reasonable timeframe in accordance with applicable law. In some states, such as California, any disclosures we provide may only cover the 12-month period preceding the verifiable request's receipt, as required by law.

#### **g. Non-discrimination**

In accordance with applicable law, we will not discriminate against you for exercising any of your US Privacy Law State privacy rights.

## **II. European Economic Area, Switzerland and United Kingdom Residents**

### **Transfers**

If you are located in the European Economic Area (EEA), Switzerland or the United Kingdom (UK), transfers of your personal data may be made to countries outside of the EEA, Switzerland or the United Kingdom. Where we collect your personal information within the EEA, Switzerland or the UK, transfer outside the

EEA, Switzerland or the UK, depending on the jurisdiction applicable to you, will be only:

- to a recipient located in a country which provides an adequate level of protection for your personal information;
- under an agreement which satisfies EEA, Swiss or UK requirements, as applicable, for the transfer of personal data to data processors or data controllers outside the EEA, Switzerland or the UK, as applicable, such as standard contractual clauses approved by the European Commission with respect to transfers outside of the EEA or the International Data Transfer Addendum to the EU Commission Standard Contractual Clauses issued by the Information Commissioner with respect to transfers outside of the UK; or
- transferred in accordance with another appropriate transfer mechanism or safeguard authorized under the Applicable Local Law.

## **Your privacy rights**

This section describes the rights of residents of the EEA, Switzerland and the UK (collectively, the “EU Territories”). Under the applicable privacy laws of the EU Territories, you may have a right to:

- obtain confirmation as to whether we process personal data about you, receive a copy of your personal data and obtain certain other information about how and why we process your personal data;
- request for your personal data to be amended or rectified where it is inaccurate (for example, if you change your address) and to have incomplete personal data completed;
- delete your personal data, which may (depending on your Applicable Local Law) include in the following cases:
  - the personal data is no longer necessary in relation to the purposes for which it was collected and processed;
  - if our legal ground for processing is consent, you withdraw consent and we have no other lawful basis for the processing;
  - if our legal ground for processing is that the processing is necessary for legitimate interests pursued by us or a third party, you object to the processing and we do not have overriding legitimate grounds;
  - you object to processing for direct marketing purposes;
  - your personal data has been unlawfully processed; or
  - your personal data must be erased to comply with a local law or legal obligation to which we are subject.
- restrict personal data processing, which may include in the following cases:

- where you contested the accuracy of the personal data, for a period enabling us to verify the accuracy of personal data;
- your personal data has been unlawfully processed and you request restriction of processing instead of deletion;
- your personal data is no longer necessary in relation to the purposes for which it was collected and processed but the personal data is required by you to establish, exercise or defend legal claims; or
- where you have objected to processing based on it being necessary for the pursuit of a legitimate interest identified by us, for a period enabling us to verify whether the legitimate grounds relied on by us override your interests.
- object to the processing of your personal data, which may include in the following cases:
  - our legal ground for processing is that the processing is necessary for a legitimate interest pursued by us or a third party; or
  - our processing is for direct marketing purposes.
- The right to data portability, which may include the following:
  - The right to receive your personal data provided by you to us and the right to send the data to another organisation (or ask us to do so if technically feasible) where our lawful basis for processing the personal data is consent or necessity for the performance of our contract with you and the processing is carried out by automated means.
- The right to withdraw consent
  - Where we process personal data based on consent, individuals have a right to withdraw consent at any time by contacting us at [privacy@vialto.com](mailto:privacy@vialto.com).

If you consider that the processing of your personal data infringes the law, you may have certain rights available to you under your Applicable Local Law, including but not limited to the right to lodge a complaint with the applicable data protection regulatory authority responsible for enforcement of data protection law in the country where you normally reside or work, or in the place where the alleged infringement occurred.

### **III. China Addendum**

This section applies solely to individuals who reside in the People's Republic of China ("China", solely for the purpose of this privacy statement, excluding Hong Kong, Macau and Taiwan). If you have any questions about the information provided in this privacy statement or our privacy practices, please contact us at [privacy@vialto.com](mailto:privacy@vialto.com).



## **Our legal grounds for processing your personal data**

We may, where applicable under the Personal Information Protection Law of the People's Republic of China ("PIPL"), rely on some or all of the following legal bases for the processing of your personal data: (i) your consent, (ii) the necessity to conclude or perform a contract to which you are a party, (iii) the necessity to conduct human resources ("HR") management pursuant to HR rules and policies formulated according to law; (iv) the necessity to perform a statutory duty or legal obligation; (v) the necessity to safeguard your life safety, health and property safety in emergency situations; (vi) for purposes of news reporting and other activities in the public interest; (vii) for purposes of processing personal data already disclosed by the individuals themselves or otherwise lawfully disclosed; and (viii) other circumstances as stipulated in and permissible under PIPL.

## **Transfer of personal data**

We operate business on a global basis. Therefore, as a result of the global nature of our business, your personal data will be transferred to or accessed by the following overseas recipient:

- Name of the Overseas Recipient: CD&R Galaxy UK Opco Limited
- Contact Information: [privacy@vialto.com](mailto:privacy@vialto.com)
- Scope of Personal Data exported: Please refer to the scope of personal data described in the "Collection of personal data" section for your specific category of data subject in Appendix A
- Purpose of Transfer: Please refer to the "Our legal grounds for processing your personal data" section of this privacy statement and the "Use of personal data" section in the section of Appendix A applicable to you.
- Processing method: Collection, recording, organization, structuring, adaptation, alteration, retrieval, consultation, storage, use, disclosure by transmission, dissemination or otherwise making available, provision, alignment or combination, restriction, erasure or destruction
- Contact Us: You may submit requests or enquiries about your personal data to [privacy@vialto.com](mailto:privacy@vialto.com).

Your personal data may also be transferred by the above-mentioned Overseas Recipient to other entities within the Vialto Partners network as well as to third parties engaged by the Vialto Partners network who are located outside of China for the purposes described in the relevant sections of the privacy statement. Please refer to the "Transfers and disclosures of personal data" section of this privacy statement for information on the categories of third parties with whom we may share your personal data. When we transfer your

personal data to foreign jurisdictions, we will protect such information as described in this privacy statement. You may exercise your rights in relation to your personal data towards the Overseas Recipients with the relevant contact information set out above.

### **Categories of personal data collected**

Please refer to the scope of personal data described in the “Collection of personal data” section of Appendix A of this privacy statement applicable to you to find out the detailed categories of personal data we collect about you. As a special note, sensitive personal data is defined in the PIPL to refer to personal data that, if leaked or if used illegally, is likely to cause harm to a natural person's personal dignity or endanger such person's personal safety or the safety of such person's property, including information concerning such person's biometrics, religious beliefs, particular capacity, medical treatments, health, financial accounts, and tracking information, as well as personal data of minors under the age of 14. Some of the personal data that we collect and process may be deemed to be sensitive personal data. In each case, we will make sure that the processing of sensitive personal data is necessary to achieve the specific purposes as described in this privacy statement, and our processing of sensitive personal data will be equipped with strict security measures and be conducted in a manner designed to have the least impact on your personal rights and interests.

### **Your legal rights in relation to personal data in China**

This section describes the rights that residents in China may have regarding their personal data under the PIPL. These rights can be exercised by submitting a verifiable request to us at [privacy@vialto.com](mailto:privacy@vialto.com).

- Right of access and copy: the right to access and copy the personal data concerning you.
- Right to rectification: the right to request us to rectify inaccurate personal data concerning you or supplement incomplete personal data.
- Right to erasure: the right to ask us to erase your personal data in certain circumstances specified under the PIPL. However, your right to erasure will not affect the lawfulness of our processing prior to the erasure request or processing based on the applicable legal bases.
- Right to explanation: the right to require us to further explain our rules of processing of personal data to the extent that these are unclear or not addressed in this privacy statement.
- Right to transfer: the right to request us to transfer your personal data that we hold about you to another controller to the extent the conditions stipulated by the PIPL are fulfilled.

- Right to withdraw your consent: If you have given your consent regarding certain types of processing activities, you can withdraw this consent at any time with future effect. Such a withdrawal will not affect the lawfulness of the processing prior to the consent withdrawal or processing based on the applicable legal bases.
- Other rights permitted by the PIPL.

Please note that the aforementioned rights might be subject to exemptions or may otherwise be limited under the PIPL.