

Effective Date: January 1, 2023

Last Reviewed/Revised on: December 30, 2022

Notice at Collection and Privacy Policy for California Residents

This California Notice at Collection and Privacy Policy for Applicants and Employees (“CCPA Workforce Disclosure”) explains how Starwood Property Trust, Inc. and its subsidiaries and affiliates (“we” “us”, “our”, or “Company”) (collectively, “Starwood”), collects, uses, discloses, and retains personal information (“Information Practices”) subject to the California Consumer Privacy Act, as amended by the California Privacy Rights Act (“CCPA”). This CCPA Workforce Disclosure applies solely to California residents who interact with us as a job applicant (“Applicants”), and employees, independent contractor, or in an employment related context (collectively, “Employees”). For ease of reading, “you” refers to both Applicants and Employees.

Notice at Collection

The following notice identifies the categories of personal information to be collected from you and the purposes for which the personal information will be used, including whether that information is sold or shared.

General Personal Information

| Categories of Personal Information | Purposes for Collection and Use |
|---|---|
| Identifiers: For example, a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers. | <ul style="list-style-type: none">• Comply with all applicable laws and regulations.• Recruit and evaluate job applicants and candidates for employment.• Conducting background and reference checks.• Manage your employment relationship with us, including, for example: onboarding, timekeeping, payroll, employee benefits, training and development, job performance, emergency contacts, workers compensation, reviews, promotions, discipline, termination, online employee accounts, and/or other human resource purposes.• To administer employment benefits such as retirement, health, and other benefit programs, services, or products to which employees and their dependents or their beneficiaries receive access to through us. |
| Personal Information Categories from Cal. Civ. Code § 1798.80(e): For example, name, Social Security number, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, medical information, or health insurance information. | |
| Characteristics of CA or Federal Protected Classifications: For example, race, religion, national origin), age (40 and over), gender, medical condition, familial status, disability, or veteran status. | |

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| <p>Commercial Information: For example, receipts of products or services purchased or obtained for reimbursements for benefits offered.</p> | <ul style="list-style-type: none"> • Manage and monitor employee access to company facilities, equipment, and systems. • Conduct internal audits and workplace investigations. • Investigate and enforce compliance with and potential breaches of Company policies and procedures. • Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance. • Perform workforce analytics, data analytics, and benchmarking. • Administer and maintain Company operations, including for safety purposes. • To promote our products/services and employee subject matter expertise. • Exercise or defend the legitimate business interests and legal rights of Company and its employees. |
| <p>Internet or Other Similar Network Activity: For example, browsing history, search history, and information regarding your interaction with an Internet Web site or application.</p> | |
| <p>Geolocation Data: For example, a device's physical location.</p> | |
| <p>Sensory or Surveillance Data: For example, video, electronic, or audio surveillance and monitoring for security purposes. This would include call recordings and monitoring security badge use or IT login access.</p> | |
| <p>Professional or Employment-Related Information: For example, compensation, evaluations, performance reviews, personnel files, and current and past job history.</p> | |
| <p>Education Information: For example, student records (as defined in the Family Education Rights and Privacy Act).</p> | |

We do not collect: Biometric information or profile data.

Sensitive Personal Information

We do not use or disclose the below sensitive personal information of Applicants or Employees for purposes other than those business purposes specifically enumerated under CCPA. As a result, we do not offer a right to limit our use or disclosure of these categories of sensitive personal information.

| <p style="text-align: center;">Categories of Sensitive Personal Information</p> | <p style="text-align: center;">Purposes for Collection and Use</p> |
|--|---|
| <p>Social Security Number, Driver's License, State Identification Card, or Passport Number</p> | <ul style="list-style-type: none"> • Operate, manage, and maintain our business. • Comply with all applicable laws, regulations, and legal process. • Conducting background and reference checks. • Manage your employment relationship with us, including, for example: onboarding, payroll, and/or other human resource purposes. • To administer employment benefits such as retirement, health, and other benefit programs, services, or products to which employees and their dependents or their beneficiaries receive access to through us. |

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|---|---|
| | <ul style="list-style-type: none"> • Exercise or defend the legitimate business interests and legal rights of Company and its employees. • Other business purposes specifically enumerated under CCPA. |
| Account log-in, financial account, password, or credentials allowing access to an account | <ul style="list-style-type: none"> • Operate, manage, and maintain our business. • Comply with all applicable laws, regulations, and legal process. • Manage your employment relationship with us, including, for example: onboarding, payroll, and/or other human resource purposes. • To administer employment benefits such as retirement, health, and other benefit programs, services, or products to which employees and their dependents or their beneficiaries receive access to through us. • Manage and monitor employee access to company facilities, equipment, and systems. • Exercise or defend the legitimate business interests and legal rights of Company and its employees. • Other business purposes specifically enumerated under CCPA. |
| Racial or ethnic origin | <ul style="list-style-type: none"> • Comply with all applicable laws, regulations, and legal process. • Other business purposes specifically enumerated under CCPA. |
| Health information | <ul style="list-style-type: none"> • Comply with all applicable laws, regulations, and legal process. • To administer employment benefits such as retirement, health, and other benefit programs, services, or products to which employees and their dependents or their beneficiaries receive access to through us. • To facilitate and provide reasonable accommodations. • Other business purposes specifically enumerated under CCPA. |

We do not collect: precise geolocation, contents of a consumer’s mail, email, and text messages (unless we are the intended recipient of the communication), genetic data, biometric information for the purpose of unique identification, or information concerning sex life or sexual orientation.

In addition to the purposes identified above, we may collect and use personal information as necessary or appropriate to:

- Comply with laws and regulations, including, without limitation, applicable tax, health and safety, antidiscrimination, immigration, labor and employment, and social welfare laws;
- Monitor, investigate, and enforce compliance with and potential breaches of Company policies and procedures and legal and regulatory requirements;
- Comply with civil, criminal, judicial, or regulatory inquiries, investigations, subpoenas, or summons; and
- Exercise or defend the legal rights of Company and its employees, affiliates, customers, contractors, and agents.

Retention Periods

Records containing personal information shall be retained if a valid business reason exists or as required by applicable law. Personal information will only be retained as long as it is reasonably necessary and proportionate for the purposes for which personal information is processed. Valid business reasons include the effective operation of our business, to manage your employment with us, to administer payroll and benefits, to comply with legal and regulatory obligations, and legal retention requirements, which may be pertinent to ongoing or reasonably foreseeable litigation, legal hold, or government investigation.

We have not and do not sell any of your personal information or share with third parties for cross-context behavioral advertising (including any sensitive personal information).

Please review our California Privacy Policy immediately below.

Privacy Policy

The purpose of this privacy policy is to provide you with a comprehensive description of our online and offline practices regarding our collection, use, disclosure, and retention of your personal information (“Information Practices”). This privacy policy describes your rights as it relates to our Information Practices and how you can exercise those rights.

The following table includes disclosures for the preceding 12 months of: categories of personal information we have collected about you, the categories we have disclosed for a business purpose, and categories of third parties with whom we shared the personal information during that period.

General Personal Information

| Category | In the preceding 12 months this category was: | | Business or Commercial Purpose for Collection & Disclosure | Categories of third parties to whom the information was disclosed |
|--|---|-----------|---|--|
| | Collected | Disclosed | | |
| Identifiers | ☒ | ☒ | <ul style="list-style-type: none"> • Comply with all applicable laws and regulations • Recruit and evaluate job applicants and candidates for employment • Conducting background and reference checks • Manage your employment relationship with us, including, for example: onboarding, timekeeping, payroll, employee benefits, training and development, job | <i>Service Providers that assist with:</i> <ul style="list-style-type: none"> • Applicant selection and recruitment processes; • Onboarding for new employees, including the collection, processing, and validation of personal information; |
| Personal Information Categories from Cal. Civ. Code § 1798.80(e) | ☒ | ☒ | | |
| Characteristics of CA or Federal Protected Classifications | ☒ | ☒ | | |

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|---|---|---|--|---|
| Commercial Information | ☒ | ☒ | <p>performance, emergency contacts, workers compensation, reviews, promotions, discipline, termination, online employee accounts, and/or other human resource purposes.</p> <ul style="list-style-type: none"> • Manage and monitor employee access to company facilities, equipment, and systems. • Conduct internal audits and workplace investigations. • Investigate and enforce compliance with and potential breaches of Company policies and procedures. • Engage in corporate transactions requiring review of employee records, such as for evaluating potential mergers and acquisitions of Company. • Maintain commercial insurance policies and coverages, including for workers' compensation and other liability insurance. • Perform workforce analytics, data analytics, and benchmarking. • Administer and maintain Company operations, including for safety purposes. • To promote our products/services and employee subject matter expertise. • Exercise or defend the legitimate business interests and legal rights of Company and its employees. | <ul style="list-style-type: none"> • Services relating to employment, including payment processing for direct deposits and processing an employee's benefits or expenses; • Services relating to our operations and your role as an employee, such as web hosting, email services, legal services, and information technology services. • Our business in operations, such as cloud storage providers, cybersecurity providers, operating and management companies <p><i>Others</i></p> <ul style="list-style-type: none"> • Law enforcement, or other legal authorities • Government entities |
| Internet or Other Similar Network Activity | ☒ | ☒ | | |
| Geolocation Data | ☒ | ☒ | | |
| Sensory or Surveillance Data | ☒ | ☒ | | |
| Professional or Employment-Related Information | ☒ | ☒ | | |
| Education Information | ☒ | ☒ | | |

We do not collect: Biometric information or profile data.

Sensitive Personal Information

We do not use or disclose the below sensitive personal information of Employees or Applicants for purposes other than those business purposes specifically enumerated under CCPA. As a result, we do not offer a right to limit our use or disclosure of these categories of sensitive personal information.

| Category | In the preceding 12 months this category was: | | Business or Commercial Purpose for Collection & Disclosure | Categories of third parties to whom the information was disclosed |
|--|---|-------------------------------------|---|--|
| | Collected | Disclosed | | |
| Social Security Number, Driver's License, State Identification Card, or Passport Number | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <ul style="list-style-type: none"> • Operate, manage, and maintain our business. • Comply with all applicable laws, regulations, and legal process. • Conducting background and reference checks. • Manage your employment relationship with us, including, for example: onboarding, payroll, and/or other human resource purposes. • To administer employment benefits such as retirement, health, and other benefit programs, services, or products to which employees and their dependents or their beneficiaries receive access to through us. • Exercise or defend the legitimate business interests and legal rights of Company and its employees. • Other business purposes specifically enumerated under CCPA. | <p><i>Service Providers that assist with:</i></p> <ul style="list-style-type: none"> • Applicant selection and recruitment processes; • Onboarding for new employees, including the collection, processing, and validation of personal information; • Services relating to our operations and your role as an employee, such as web hosting, email services, legal services, and information technology services • Our business in operations, such as cloud storage providers, operating and management companies |
| Account log-in, financial account, password, or credentials allowing access to an account | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <ul style="list-style-type: none"> • Operate, manage, and maintain our business. • Comply with all applicable laws, regulations, and legal process. • Manage your employment relationship with us, including, for example: onboarding, payroll, and/or other human resource purposes. • To administer employment benefits such as retirement, health, and other benefit | <p><i>Service Providers that assist with:</i></p> <ul style="list-style-type: none"> • Services relating to employment, including payment processing for direct deposits and processing an employee's benefits or expenses; • Our business in operations, such as cloud storage providers, |

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|--------------------------------|-------------------------------------|-------------------------------------|---|--|
| | | | <p>programs, services, or products to which employees and their dependents or their beneficiaries receive access to through us.</p> <ul style="list-style-type: none"> • Manage and monitor employee access to company facilities, equipment, and systems. • Exercise or defend the legitimate business interests and legal rights of Company and its employees. • Other business purposes specifically enumerated under CCPA. | operating and management companies |
| Racial or ethnic origin | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <ul style="list-style-type: none"> • Comply with all applicable laws, regulations, and legal process. • Other business purposes specifically enumerated under CCPA. | Government entities |
| Health Information | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <ul style="list-style-type: none"> • Comply with all applicable laws, regulations, and legal process. • To administer employment benefits such as retirement, health, and other benefit programs, services, or products to which employees and their dependents or their beneficiaries receive access to through us. • To facilitate and provide reasonable accommodations. • Other business purposes specifically enumerated under CCPA. | <p><i>Service Providers that assist with:</i></p> <ul style="list-style-type: none"> • Services relating to our operations and your role as an employee, such as web hosting, email services, legal services, and information technology services • Our business in operations, such as cloud storage providers, operating and management companies <p><i>Others</i></p> <ul style="list-style-type: none"> • Government entities |

We do not collect: precise geolocation, contents of a consumer’s mail, email, and text messages (unless we are the intended recipient of the communication), genetic data, biometric information for the purpose of unique identification, or information concerning sex life or sexual orientation.

We may also disclose your personal information to the following categories of third parties:

- **At Your Direction.** We may disclose your personal information to any third party with your consent or at your direction.

- **Business Transfers or Assignments.** We may disclose your personal information to other entities as reasonably necessary to facilitate a merger, sale, joint venture or collaboration, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).
- **Legal and Regulatory.** We may disclose your personal information to government authorities, including regulatory agencies and courts, as reasonably necessary for our business operational purposes, to assert and defend legal claims, and otherwise as permitted or required by law.

The categories identified as collected in the tables above were collected from the following categories of sources:

- Information from you that you directly provide to us.
- Information from you that you provide passively from your use of employer owned devices or on personal devices in the course and scope of your employment with us.
- Information about you from third party sources:
 - Internet service providers
 - Data analytics providers
 - Public record sources
 - Government entities
 - Operating systems and platforms
 - Social media networks and platforms
 - Professional Organizations
 - Recruitment Organizations or Firms
 - Credit Reporting Agencies or Resellers

Selling to Third Parties or Sharing with Third Parties for Cross-Context Behavioral Advertising

We have not and do not sell any of your personal information or share with third parties for cross-context behavioral advertising (including any sensitive personal information). We do not have actual knowledge that we sell or share the personal information of minors under 16 years of age.

Your Right to Know

You have the right to request any of the following:

- 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, selling, or sharing with third parties for cross context behavioral advertising (e.g. targeted advertising)
- the categories of third parties to whom we disclose personal information
- the specific pieces of personal information we have collected about you

You can do this through a verified consumer request. That process is described below in the section, "Submitting a Verified Consumer Request."

Your Right to Request Correction of Inaccurate Personal Information

You have the right to request correction of inaccurate personal information maintained by us. We may request documentation from you to determine the accuracy of the information. If you provide us documentation either upon our request or through your own initiative, that documentation will only be used for the purpose of correcting your personal information and complying with our recordkeeping requirements. We may deny your request if we have previously denied your same request to correct an alleged inaccuracy in the past six (6) months unless you provide new or additional documentation that the information at issue is inaccurate.

As an alternative to correction, we may delete the inaccurate information if it does not negatively impact you or if you consent to this deletion. We reserve the right to deny this request if allowed under law, or if we determine that the contested information is more likely than not accurate, based on the totality of circumstances. You can submit a correction request through a verified consumer request. That process is described below in the section, "Submitting a Verified Consumer Request."

Your Right to Request Deletion of Your Personal Information

You have the right to request that we delete any of your personal information collected by us, subject to certain exceptions. You can do this through a verified consumer request. That process is described below in the section, "Submitting a Verified Consumer Request."

There may be scenarios where we deny your deletion request. If that occurs, we will provide you with an explanation as to why we could not delete all or some of your personal information.

Submitting a Verified Consumer Request

You have the right to submit verified consumer requests to know information, to correct information, or for deletion.

You may submit a request to know information, to correct information, or for deletion by providing the information listed below via email at sptlegal@starwood.com, via post at 2340 Collins Ave., Suite 700, Miami Beach, Florida 33139, or call us toll free at 1-833-431-1245.

- **Applicants:** your name, address, email address, along with description of the type of request you are seeking.
- **Employees:** your name, last four of Social Security Number, last manager's name or bank name associated with direct deposit, along with description of the type of request you are seeking.

Your request will be verified by matching the information you provide to information that we have collected.

If you submit a request that is not through one of these designated methods or is deficient in some manner unrelated to verification, we will provide you with information on how to submit the request or remedy any deficiencies.

Once we receive your verifiable consumer request, we will confirm receipt of the request within 10 business days describing our verification process. We will respond to your request within 45 calendar days, if we are able to verify your identity.

The response to a request to know will provide all personal information collected and maintained about you since January 1, 2022, unless doing so proves impossible or would involve disproportionate effort. Please note that we are not required to provide personal information to you more than twice in a 12-month period. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Requests to Know or Delete Information About a Child Under the Age of 13: We accept requests for information regarding minors under the age of 13 if we can determine that such requests were submitted by a parent or guardian.

Using an Authorized Agent to Submit a Request

Only you, a person registered with the California Secretary of State, or a person you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. If you use an authorized agent, you may provide a power of attorney executed pursuant to California Probate Code sections 4000 to 4465. **If a power of attorney that meets those provisions is not submitted, you will be required to verify your identity directly with us, and directly confirm with us that you provided the authorized agent permission to submit the request.**

If you're an authorized agent making a request, you must email us at sptlegal@starwood.com or write us by post at 2340 Collins Ave., Suite 700, Miami Beach, Florida 33139 and:

1. Provide the power of attorney provided to you by the consumer pursuant to Probate Code sections 4000 to 4465; or
2. Provide proof of signed permission along with a copy of your ID **and** have the consumer e-mail us or write us at the same address listed above to directly confirm with us that they provided you permission to submit the request.

Your Right to Non-Discrimination for the Exercise of a Privacy Right

We will not discriminate or retaliate against you for exercising any of your CCPA rights.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on this page and update the notice's effective date.

Contact for More Information

If you have any questions or comments about this notice, the ways in which we collect and use your information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

- Phone: 1-833-431-1245
- Email: sptlegal@starwood.com
- Postal Address: Starwood Property Trust, Inc.
2340 Collins Ave., Suite 700
Miami Beach, FL 33139
Attn: SPT Legal - CCPA Notices