**Piper Sandler Companies**

**California Personnel Privacy Notice**

**Privacy Statement – California**

This privacy notice for California residents supplements the information contained in the Privacy Statement of Piper Sandler Companies and its subsidiaries (collectively, “we”, “us”, or “our”) and applies solely to current and former applicants, contractors, and personnel of Piper Sandler Companies who reside in the State of California (“consumer(s)” or “you”). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice.

Information we collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information,” subject to the exclusions described below). Depending on whether you are a personnel, contractor or job applicant, and subject to any applicable limitations under law, we may collect the following categories of personal information about you for the following purposes:

|  |  |  |
| --- | --- | --- |
| **Category** | **Examples** | **Collected** |
| 1. Identifiers | 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. | Yes |
| 1. Personal information categories listed in the California Customer Records statute (Cal. Civ Code 1798.80(e)). | A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, personnel history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories. | Yes |
| 1. Protected classification characteristics under California or federal law.[[1]](#footnote-1) | Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information) | Yes |
| 1. Commercial information. | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | Yes |
| 1. Biometric information. | Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, face prints, and voice prints. | Yes |
| 1. Internet or other similar network activity. | Browsing history, search history, information on consumer’s interaction with a website, application, or advertisement. | Yes |
| 1. Geolocation data. | Physical location or movements | Yes |
| 1. Sensory data. | Audio, electronic, visual, thermal, olfactory, or similar information. | Yes |
| 1. Professional or personnel-related information. | Current or past job history or performance evaluations. | Yes |
| 1. Education information (excluding publicly available personally identifiable information as defined in the family Education Rights and Privacy Act (20 U.S.C. Section 123g, 34 C.F.R. Part 99)). | Information relating to a person’s education or educational history. | Yes |
| 1. Inferences drawn from other personal information. | Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes | Yes |

Personal information does not include:

* Publically available information from government records.
* De-identified or aggregated consumer information.
* Information excluded from CCPA’s scope, like:
  + Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPPA) and California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  + Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the driver’s Privacy Protection Act of 1994.

Use of Personal Information

We may use or disclose the personal information we collect about you for one or more of the following business purposes:

* To identify you, authenticate your identity; maintain your personnel records; help others to contact you; communicate with you; and maintain an internal personnel directory.
* To determine your eligibility to work and fulfill our obligations to relevant government authorities.
* To register you with regulatory supervisory authorities in the maintenance of state and industry qualification records and required licenses.
* To grant you access to internal systems; monitor and evaluate your work and performance.
* To contact designated contacts in the case of an emergency.
* To offer you benefits and accommodations, manage leave, or as part of the administration of our health plan or wellness program.
* To assess your personal and professional development, your suitability for promotions, benefits and other awards, job moves and staff restructuring and fulfill our obligations to regulators (including demonstrating the suitability of employees for their role).
* To determine your ability for certain job roles and to fulfill our obligations to regulators (including demonstrating the suitability of personnel for their role to regulators and professional bodies).
* To pay you or provide other benefits and process any expense claims.
* To monitor your compliance with our internal policies and procedures, to investigate security breaches and misuse of computer equipment and systems, to protect the safety of personnel and third parties, and to protect our property from theft, vandalism and damage
* To respond to law enforcement or regulatory requests and as required by applicable law, legal service, court order, or governmental regulations.
* As described to you when collecting your personal information or as otherwise set forth in the CCPA.
* To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, in which personal information held by us is among the assets considered.
* Public communications about company events.

We will not collect additional categories of personal information or use the personal information we collected for additional purposes without providing you notice.

We do not sell personal information and in the preceding twelve (12) months have not sold any personal information.

For More Information

For more information on our privacy practices generally, please refer to our Privacy Notice at PiperSandler.com.

Accessibility

We are committed to ensuring that our communications are accessible to individuals with disabilities. Individuals with disabilities can access this policy in alternative formats by contacting us at the address, phone, or email address below. This website is designed to meet content accessibility guidelines. To submit accessibility-related requests or report barriers to accessibility, please contact us at one of the contacts listed below.

Changes to Our Privacy Notice

This privacy notice may be amended or updated from time to time to reflect changes in our practices with respect to the processing of your personal information, or changes in applicable law. We encourage you to read this notice carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this notice.

Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information or your choices and rights regarding such use, please do not hesitate to contact us at:

Phone: 612-303-6492

Website: PiperSandler.com

Email: Laura.R.Kruth@psc.com

Postal Address:

Laura R. Kruth

Piper Sandler Companies

J09SHR

800 Nicollet Mall, Ste 900

Minneapolis, MN 55402

Version 3 – 6-8-20

1. Some items in this category of information are solicited from job applicants, but are not required to be provided for candidacy. [↑](#footnote-ref-1)