

Candidate Privacy Notice

Introduction

This notice (Notice) describes how THE MICHAELSON GROUP HOLDINGS, L.L.C. and its subsidiaries and related companies (collectively, THE MICHAELSON GROUP HOLDINGS, L.L.C.) handle and protect data to which THE MICHAELSON GROUP HOLDINGS, L.L.C. is provided access in connection with the recruiting process.

By making available your Candidate Data, as defined below, you confirm that:

- You have reviewed this Notice and agree that THE MICHAELSON GROUP HOLDINGS, L.L.C. may process your Candidate Data in accordance with this Notice;
- You have provided any notices and obtained any consents needed to provide information concerning others (e.g., information about employment references); and
- Your Candidate Data may be transferred and processed worldwide, including the US and other countries that may not be deemed to provide the same level of data protection as your home country, for the purposes and in the manner specified in this Notice.

THE MICHAELSON GROUP HOLDINGS, L.L.C. will process Candidate Data in accordance with this Notice, unless in conflict with requirements of applicable law, in which case applicable law will prevail.

Your consent to the provisions of this Notice is required in order to submit or make available Candidate Data. If you decline to submit or make available your Candidate Data, it may affect your ability to apply for or receive an offer of employment.

This Notice does not form part of any contract of employment offered to candidates hired by THE MICHAELSON GROUP HOLDINGS, L.L.C.

Definitions

CANDIDATE DATA is identifiable information that an individual makes available to THE MICHAELSON GROUP HOLDINGS, L.L.C. in connection with the recruiting process. THE MICHAELSON GROUP HOLDINGS, L.L.C. may collect Candidate Data directly from a job candidate or from third parties, for example, in connection with a background or employment check or employment reference, subject to your consent where required by law. Candidate Data may include a variety of information, such as candidate status, work history/job data, education, compensation, employer feedback, questionnaire results, contact information, previous addresses or names, additional information provided by the candidate (e.g., a cover letter), driver's license number as required for certain positions, references, and criminal history where permitted by law.

PROCESSING refers to any action performed on Candidate Data, such as collecting, recording, organizing, storing, transferring, modifying, using, disclosing, or deleting.

SENSITIVE CANDIDATE DATA is Candidate Data concerning nationality or citizenship, race or ethnic origin, criminal history, or trade union membership. THE MICHAELSON GROUP HOLDINGS, L.L.C. does not request or consider information concerning religion, sex life or political opinions in connection with recruiting.

Collection

You may use various electronic and paper methods to submit Candidate Data to THE MICHAELSON GROUP HOLDINGS, L.L.C. You agree that, in addition to collecting Candidate Data directly from you, THE MICHAELSON GROUP HOLDINGS, L.L.C. may collect Candidate Data from third parties, for example, from recruiters, in connection with a background or employment check or an employment reference (subject to your consent where required by law) or, to the extent permitted by law, from a recruiting or other web site.

Processing and Retention

THE MICHAELSON GROUP HOLDINGS, L.L.C. processes Candidate Data for legitimate human resources and business management purposes. These include identifying and evaluating candidates for THE MICHAELSON GROUP HOLDINGS, L.L.C. positions; record-keeping related to hiring processes; analyzing the hiring process and outcomes; and conducting background checks, where permitted by law. In addition, Candidate Data may be used to comply with THE MICHAELSON GROUP HOLDINGS, L.L.C.'s legal, regulatory and corporate governance requirements. If a candidate is hired, Candidate Data may be used in connection with his/her employment consistent with THE MICHAELSON GROUP HOLDINGS, L.L.C.'s employment data protection policies.

In addition to using Candidate Data for the position for which you have applied, THE MICHAELSON GROUP HOLDINGS, L.L.C. may retain and use your Candidate Data to consider you for other positions. If you do not want to be considered for other positions or would like to have your Candidate Data removed, you may contact THE MICHAELSON GROUP HOLDINGS, L.L.C. as specified below. Unless required for tax or other legal purposes or in connection with employment as specified above, Candidate Data will be retained for a maximum of three years (or less where required by law).

Sharing with Third Parties

THE MICHAELSON GROUP HOLDINGS, L.L.C. may transfer Candidate Data to external third-party providers performing certain services for THE MICHAELSON GROUP HOLDINGS, L.L.C. Such third-party providers have access to Candidate Data solely for the purposes of performing the services specified in the applicable service contract, and THE MICHAELSON GROUP HOLDINGS,

L.L.C. requires the providers to undertake security measures consistent with the protections specified in this Notice.

THE MICHAELSON GROUP HOLDINGS, L.L.C. may be required to disclose certain Candidate Data to other third parties (1) as required by law; (2) to protect THE MICHAELSON GROUP HOLDINGS, L.L.C.'s legal rights to the extent authorized or permitted by law; or (3) in an emergency where the health or safety of a candidate or other individual may be endangered. The Michaelson Group Holdings, L.L.C. In addition, in the event of a re-organization, The Michaelson Group Holdings, L.L.C. sale, joint venture, assignment, or other transfer or disposition of all or any portion of THE MICHAELSON GROUP HOLDINGS, L.L.C.'s business, THE MICHAELSON GROUP HOLDINGS, L.L.C. may transfer Candidate Data to successor entities or parties.

Sensitive Candidate Data

THE MICHAELSON GROUP HOLDINGS, L.L.C. may perform background and criminal checks where permitted by law, and may process other Sensitive Candidate Data, such as citizenship or nationality information or health information, when relevant for a position and permitted by law. If THE MICHAELSON GROUP HOLDINGS, L.L.C. intends to collect Sensitive Personal Data from third parties, you will be provided notice and the opportunity to consent. If you have a disability and would like THE MICHAELSON GROUP HOLDINGS, L.L.C. to consider an accommodation, you may provide that information during the recruiting process. To the extent you make Sensitive Candidate Data available to THE MICHAELSON GROUP HOLDINGS, L.L.C., you consent to THE MICHAELSON GROUP HOLDINGS, L.L.C. processing such Data in accordance with this Notice.

Security and Confidentiality

THE MICHAELSON GROUP HOLDINGS, L.L.C. employs technical and organizational measures designed to protect the integrity, confidentiality, security and availability of Candidate Data, and to comply with applicable legal requirements for information security. THE MICHAELSON GROUP HOLDINGS, L.L.C. limits access to internal systems that hold Candidate Data to individuals who need access for a legitimate business purpose.

Candidate Rights

You may exercise the following rights in relation to your Candidate Data:

Access, Correction and Deletion: THE MICHAELSON GROUP HOLDINGS, L.L.C. will provide you access to your Candidate Data that THE MICHAELSON GROUP HOLDINGS, L.L.C. holds to the extent required by law in your home country, regardless of the location of the Candidate Data processing. You may request correction or deletion of that Candidate Data, except where retention is required by your contractual relationship with THE MICHAELSON GROUP HOLDINGS, L.L.C., in the context of a legal dispute, or as otherwise required by law. If access, correction or deletion is denied, the reason for the denial will be communicated to you.

Inquiries, Complaints and Objections: You may withdraw consent to the processing of your Candidate Data or submit inquiries, complaints and/or objections to the processing of your Candidate Data by sending a request in writing to: hr@themichaelsongroup.us.

Direct Marketing

THE MICHAELSON GROUP HOLDINGS, L.L.C. will not use Candidate Data to offer you any products or services for personal or family consumption (“direct marketing”) or provide Candidate Data to third parties for their direct marketing.

Changes to This Notice

THE MICHAELSON GROUP HOLDINGS, L.L.C. reserves the right to modify this Notice by posting changes to The Michaelson Group relevant websites. If you submit additional Candidate Data or request to be considered for a position following the effective date of a modified Notice, your Candidate Data will be handled in accordance with the Notice in effect at that time.

EFFECTIVE DATE: JANUARY 1, 2016