

PEAKSTONE REALTY TRUST CANDIDATE AND PERSONNEL PRIVACY POLICY

Last Revised: January 26, 2024

This Candidate and Personnel Privacy Policy (“**Privacy Policy**”) describes how Peakstone Realty Trust and all successors, subsidiaries, affiliates and assigns thereof (collectively, “**PKST**”, “**we**”, “**our**” or “**us**”) collect, use, and disclose Personal Information about individuals who were, are, or may become employed by PKST, including candidates, current and former employees, trustees, officers, contractors and or other part-time and full-time workers (collectively, “**Covered Persons**”, “**you**”, or “**your**”).

In this Privacy Policy, “**Personal Information**” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with you. “**Sensitive Personal Information**” refers to certain types of Personal Information that are deemed particularly sensitive under applicable state privacy laws, including the California Consumer Privacy Act (“**CCPA**”), such as government identification numbers, health or biometric information, account access credentials, precise geolocation, or racial or ethnic origin). For purposes of this Privacy Policy, references to Personal Information include Sensitive Personal Information, unless otherwise indicated.

1. UPDATING THIS PRIVACY POLICY

We may modify this Privacy Policy from time to time in which case we will update the “Last Revised” date. If we make material changes to the ways in which we process your Personal Information, we will use reasonable efforts to notify you and will take additional steps as required by applicable law.

2. OUR COLLECTION OF PERSONAL INFORMATION

We collect Personal Information about you from a variety of sources, including from you directly, from your references, employment agencies or recruiters, and from our vendors that help manage the employment lifecycle (including for payroll and benefits administration). Over the past 12 months, depending on your relationship with PKST, we may have collected the following categories of Personal Information, including Sensitive Personal Information (denoted by *):

- Identifiers such as name, email address, IP address, home address, date of birth and phone number.
- Personal information categories listed in the California Customer Records Statute such as name, signature, address, social security number*, telephone number, passport number*, driver’s license* or state identification card number*.
- Protected classification characteristics under California or federal law such as race*, color*, national origin or ancestry*, sex (including gender, pregnancy, sexual orientation* and gender identity*), age, physical or mental disability,* veteran status, and citizenship.
- Internet or other similar network activity such as information regarding your interaction on our devices and systems, and other data related to building and system access (such as information obtained through electronic means such as swipe card records).
- Geolocation data such as IP address (approximate location).

- Audio, electronic, visual, thermal, olfactory or similar information such as photographs, video recordings and voice recordings (such as CCTV footage).
- Professional or employment-related information such as location of workplace, employee category, employment contract, compensation, title, job description, working hours, retirement plans, information related to your access to and usage of work equipment and resources, work product, information necessary for the administration of benefits, training records, professional membership, details of vacation or leave (e.g., parental, sick, leave accrual, etc.), delivery of contractual benefits, performance evaluations, information related to career progression and promotion, complaints, disciplinary proceedings and decisions, information related to termination of employment or retirement including notice periods, reasons for leaving and exit interviews.
- Non-public education information collected by certain federally funded institutions such as education records.
- Government identifiers* such as social security number, driver's license, birth certificate, permanent resident card, state identification card or passport number.
- Account access credentials* such as account login in combination with any required security or access code, password or credentials allowing access to accounts you use in relation to your employment or other engagement you may have with Company.
- Health Information* such as information that can reveal characteristics of your health such as medical diagnoses shared when applying for personal leave, information related to physical and mental health or a condition, COVID-19 related information, occupational health information, and any information you may provide when using employee benefits.
- Other information that you provide to us.
- Inferences drawn from any of the categories of information above.

In certain cases, we may ask you for additional information for purposes of complying with applicable law. PKST does not necessarily collect all of the Personal Information types listed from all Covered Persons.

3. HOW WE USE YOUR PERSONAL INFORMATION

We use the above Personal Information for various business purposes in relation to your employment or engagement with us, including:

- Managing the employment lifecycle, such as recruitment, onboarding, training, conducting performance evaluations, terminating the relationship, off-boarding, and completing employment verifications for former employees.
- Recruiting, interviewing, and evaluating Candidates, including conducting background checks, verifying your Personal Information, and other pre-employment screenings (where permitted by law).
- Entering into and honoring contracts, including making compensation and benefits decisions.
- Administering payroll, retirement plan contributions, health plans, and other employee benefits, maintaining personnel records and monitoring both your conduct and performance as a Covered Person.
- Improving employment practices, including equality and diversity in the workplace.

- Enhancing and maintaining health, safety, and accessibility at work, including by providing workplace accommodations, facilitating sick leave and sick pay, complying with statutory health and safety monitoring and reporting, securing the working environment, responding to emergencies, and taking steps to mitigate the spread of viruses or diseases (or similar) in the context of a health emergency (in some cases, this could include collecting, using or disclosing information related to third parties with whom you are in contact or with whom you live).
- Managing, planning, and organizing the operations of our business, including by facilitating business planning and restructuring exercises.
- Safeguarding our business interests, including our intellectual property and confidential information, and the security, availability and resilience of our premises and IT systems.
- Preventing fraud, crime, harassment, discrimination, or other misconduct, handling investigations, claims, grievances, and disciplinary proceedings, and defending or pursuing legal claims.
- Planning and executing a transaction involving the sale, transfer, merger, consolidation, restructuring, or re-organization of any part(s) of our business or our assets, or merging with, acquiring or forming a joint venture with any other business.
- Complying with legal and regulatory obligations, including: ensuring that tax and other statutory dues are paid; responding to requests from foreign and domestic law enforcement, regulators and courts; carrying out verifications in relation to your right to work; equal opportunities monitoring; investigating claims of discrimination or harassment; making reasonable adjustments for disabled employees; managing statutory leave and pay; and complying with leave management procedures.

PKST does not use or disclose Sensitive Personal Information for restricted purposes that California residents have a right to limit under the CCPA. We do not attempt to reidentify deidentified information that we derive from Personal Information, except for the purpose of testing whether our deidentification processes comply with applicable law.

4. HOW THE COMPANY DISCLOSES YOUR PERSONAL INFORMATION

In certain circumstances, we may disclose your Personal Information to third parties for legitimate purposes subject to this Privacy Policy, including:

- Affiliates, including subsidiaries and other members of our corporate family in the course of providing services to you or for our everyday business purposes.
- Service providers and business partners, who provide employment-related services, or otherwise help facilitate your engagement with Company, such as payroll and benefits administration, hiring services, facility access and security, cloud storage and IT services, fraud prevention services, personnel records management, business applications, and background checks and other verifications. We may also disclose Personal Information to financial advisors, auditors, attorneys or business partners (collectively, “**Service Providers**”).
- Professional advisors, including lawyers and accountants who provide advisory, consulting, and legal services to PKST (collectively, “**Professional Advisors**”).
- Law enforcement, courts, regulators, counterparties, and other third parties in connection with a legal obligation, including if reasonably necessary or appropriate to:

- Comply with any applicable law or regulation, civil, criminal or regulatory inquiry, investigation or legal process or enforceable government request;
 - Respond to legal process (such as a search warrant, subpoena, summons or court order);
 - Cooperate with law enforcement agencies concerning conduct or activity that we reasonably and in good faith believe may violate federal, state or local law; or
 - Exercise or defend legal claims, protect against harm to our rights, property, interests or safety of PKST and its Personnel, as required or permitted by law.
- Third parties in connection with or in anticipation of an asset sale, merger, bankruptcy, or other business transaction.
 - Other third parties with your permission or upon your direction.

In the preceding 12 months, and depending on your relationship with us, we may have disclosed the following categories of Personal Information, including Sensitive Personal Information (denoted by *) for a business purpose.

Categories of Personal Information	Categories of Recipients
<ul style="list-style-type: none"> ● Identifiers ● Personal information categories listed in the California Customer Records Statute ● Protected classification characteristics under California or federal law ● Government identifiers* ● Health Information* ● Internet or other similar network activity ● Geolocation data ● Professional or employment-related information ● Non-public education information collected by certain federally funded institutions ● Account access credentials* 	<ul style="list-style-type: none"> Service Providers Professional Advisors

We do not “sell” or “share” Personal Information (as those terms are defined in the CCPA), nor have we done so in the preceding 12 months. Further, we do not have actual knowledge that we “sell” or “share” Personal Information of residents under 16 years of age. Additionally, we only use and disclose Sensitive Personal Information for the purposes specified in the CCPA or otherwise in line with your consent.

As of the date of this Policy, under the CCPA, “selling” is defined as the disclosure of Personal Information to third parties in exchange for monetary or other valuable consideration, and “sharing”

is defined as the targeting of advertising to a consumer based on that consumer's Personal Information obtained from the consumer's activity across websites.

5. RETENTION OF PERSONAL INFORMATION

We retain your Personal Information for as long as is reasonably necessary for the purposes specified in this Privacy Policy. When determining the length of time to retain your Personal Information, we consider various criteria, including whether we need the Personal Information to maintain your employment, comply with our legal obligations, enforce our contractual agreements, prevent harm, promote safety, security and integrity, or protect ourselves, including our rights, property or business.

6. YOUR RIGHTS

Depending on where you live, you may have the rights listed below in relation to Personal Information that we have collected about you, subject to applicable exceptions.

- **Right to Access.** You may have the right to request a copy of the Personal Information we maintain about you in a portable and, to the extent technically feasible, readily usable format and to request supporting information explaining how the Personal Information is used the specific pieces of personal data that we have collected about you.
- **Right to Request Correction.** You may have the right to request that we correct inaccurate Personal Information that we maintain about you.
- **Right to Request Deletion.** You may have the right to request deletion of your Personal Information.

If you would like to exercise one of your rights, please contact us using one of the methods described in the Contact Us section below. We will not discriminate against you for exercising any of these rights. Your request should include your name, preferred contact information, and the nature of your request, including which rights you would like to exercise. Please note that we may require additional Personal Information from you to verify your identity and process your request. You can also submit a request via an authorized agent using the contact methods described above. If you use an authorized agent, we may request a copy of the agent's signed permission to act, verify your identity directly, and ask that you confirm the agent's authority.

7. HOW TO CONTACT US

Should you have any questions about our privacy practices or this Privacy Policy, please contact us by (i) email at info@pkst.com, or (ii) phone at 310-606-3200.