

## CALIFORNIA CONSUMER PRIVACY RIGHTS ACT NOTICE

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When it comes to your financial affairs, you expect a relationship built on privacy and integrity. **That is why Northern Trust does not sell personal information to other companies.**

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS (“CPRA Privacy Notice”) supplements the information contained in the Privacy Notice of The Northern Trust Company and its subsidiaries (collectively, “Northern Trust”, “we,” “us,” or “our”) and applies to our customers who are consumers who reside in the State of California (“consumers” or “you”). We adopt this notice to comply with the California Consumer Privacy Rights Act of 2020 (“CPRA”).

For purposes of this CPRA Privacy Notice, “Personal Information” is information that relates to an identified or identifiable person. Personal Information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CPRA’s scope, like:
  - medical information governed by the California Confidentiality of Medical Information Act (“CMIA”);
  - protected health information collected by a covered entity or business associated governed by the Health Insurance Portability and Accountability Act of 1996 (“HIPAA”);
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (“FCRA”), the Gramm-Leach-Bliley Act (“GLBA”) or California Financial Information Privacy Act (“FIPA”).

### **How We Collect, Use and Share Personal Information**

The table below describes the categories of Personal Information we have collected in the prior twelve (12) months, the sources from which we collected that Personal Information, the purposes for which we use that Personal Information, and the third parties with whom we share that Personal Information. More information regarding the purposes is included below after the table.

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Category of Personal Information Collected	Categories of Source(s) from which Personal Information is Collected	Business or Commercial Purpose(s) for which Personal Information is Collected or Used	Categories of Third Parties with whom Personal Information is Shared
<p><b>Identifiers</b> e.g., 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</p>	<p>Directly from you or your agents Directly and indirectly from activity on our website Other sources<sup>1</sup></p>	<ul style="list-style-type: none"> <li>• Providing your services</li> <li>• Anti-money laundering</li> <li>• Tax reporting</li> <li>• Investigation and fraud prevention</li> <li>• Billing</li> <li>• Analysis and research</li> <li>• Marketing</li> <li>• Detecting security incidents</li> <li>• Debugging</li> <li>• Internal research</li> <li>• Service enhancements</li> </ul>	<ul style="list-style-type: none"> <li>• to credit reporting agencies (e.g., Experian)</li> <li>• to Northern Trust affiliates and our service providers</li> <li>• to competent authorities (including tax authorities), courts and bodies as required by law</li> </ul>
<p><b>Customer Record Information<sup>2</sup></b> e.g., name, signature, address, phone number, social security number, date of birth, occupation and government-issued identification</p>	<p>Directly from you or your agents Other sources</p>	<ul style="list-style-type: none"> <li>• Providing your services</li> <li>• Anti-money laundering</li> <li>• Tax reporting</li> <li>• Investigation and fraud prevention</li> <li>• Billing</li> <li>• Analysis and research</li> <li>• Marketing</li> <li>• Detecting security incidents</li> <li>• Debugging</li> <li>• Internal research</li> <li>• Service enhancements</li> </ul>	<ul style="list-style-type: none"> <li>• to credit reporting agencies (e.g., Experian)</li> <li>• to Northern Trust affiliates and our service providers</li> <li>• to competent authorities (including tax authorities), courts and bodies as required by law</li> </ul>
<p><b>Commercial information</b> e.g., records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</p>	<p>Directly from you or your agents Other sources</p>	<ul style="list-style-type: none"> <li>• Providing your services</li> <li>• Anti-money laundering</li> <li>• Tax reporting</li> <li>• Investigation and fraud prevention</li> <li>• Billing</li> <li>• Analysis and research</li> <li>• Marketing</li> <li>• Detecting security incidents</li> <li>• Debugging</li> <li>• Internal research</li> <li>• Service enhancements</li> </ul>	<ul style="list-style-type: none"> <li>• to credit reporting agencies (e.g., Experian)</li> <li>• to Northern Trust affiliates and our service providers</li> <li>• to competent authorities (including tax authorities), courts and bodies as required by law</li> </ul>
<p><b>Biometric information</b> e.g., voiceprint</p>	<p>Directly from you</p>	<ul style="list-style-type: none"> <li>• Providing your services</li> <li>• Investigation and fraud prevention</li> </ul>	<ul style="list-style-type: none"> <li>• to credit reporting agencies (e.g., Experian)</li> <li>• to Northern Trust affiliates and our service providers</li> <li>• to competent authorities (including tax authorities), courts and bodies as required by law</li> </ul>

1 Other sources such as credit and insurance information bureaus, references you have provided, program partners, government or financial institutions or from public sources such as telephone directories, newspapers, Internet sites, commercially available marketing lists or government agencies and registries or public record.

2 Customer Record Information are personal data elements listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))

Category of Personal Information Collected	Categories of Source(s) from which Personal Information is Collected	Business or Commercial Purpose(s) for which Personal Information is Collected or Used	Categories of Third Parties with whom Personal Information is Shared
<p><b>Internet or other similar network activity</b></p> <p>e.g., browsing history, search history, information on a consumer’s interaction with a website, application and third- party analytics cookies</p>	Directly and indirectly from activity on our website	<ul style="list-style-type: none"> <li>• Marketing</li> <li>• Detecting security incidents</li> <li>• Debugging</li> <li>• Internal research</li> <li>• Service Enhancements</li> </ul> <p>Please see our <a href="#">cookie policy</a> for more details on our use of cookies.</p>	<ul style="list-style-type: none"> <li>• to Northern Trust affiliates and Service Providers</li> <li>• to competent authorities (including tax authorities), courts and bodies as required by law</li> </ul>
<p><b>Professional or employment-related information</b></p> <p>e.g., Current or past job history</p>	Directly from you or your agents	<ul style="list-style-type: none"> <li>• Marketing</li> </ul>	<ul style="list-style-type: none"> <li>• to Northern Trust affiliates and Service Providers</li> </ul>

**PURPOSES FOR USE OF PERSONAL INFORMATION**

The following describes in further detail the business and commercial purposes identified in the table above:

- Providing your services: To fulfil or meet the obligations associated with your product and service contracts, such as to process your transactions and maintain your account(s)
- Anti-money laundering: To comply with our anti-money laundering obligations under applicable laws. Northern Trust will itself (or through a third party, such as a credit reference agency) process certain Personal Information about you or your directors, officers and employees and your beneficial owners (if applicable) to permit Northern Trust to meet legal obligations or to pursue Northern Trust’s interests in relation to, the prevention of fraud, money laundering, terrorist financing, sanctions-prohibited actions, bribery, corruption, and/or tax evasion, on an on-going basis.
- Tax reporting: To report tax-related information to tax authorities
- Investigation and fraud prevention: To investigate and prevent fraud; to detect, prevent, investigate and prosecute crime; and to enforce or defend Northern Trust and its affiliates’ rights.
- Billing: To update and maintain our records and for fee billing
- Analysis and research: To carry out statistical analysis and market research
- Marketing: To provide you with information about products and services that may be of interest to you
- Detecting security incidents: To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and prosecute those responsible for that activity.

- Debugging: To perform debugging in order to identify and repair errors that impair existing intended functionality
- Internal research: To undertake internal research for technological development and demonstration
- Service enhancements: To undertake activities to verify, maintain, improve, upgrade, or enhance the quality or safety of a service that is controlled by Northern Trust

### **Retention Period**

Northern Trust will retain your Personal Information for as long as is required to (i) provide the services to you or the institution you represent, (ii) fulfill the purposes for which the data was collected, (iii) comply with our legal/regulatory obligations and/or (iv) comply our internal data retention policies that apply to your Personal Information.

### **Your Rights and Choices**

The CPRA provides certain consumers (i.e., California residents) with specific rights regarding their Personal Information. If you are a California resident, this section describes the CPRA rights that you may have and explains how to exercise those rights.

### **Right to Know About Personal Information Collected, Used or Disclosed**

You may have the right to request that we disclose certain information to you about our collection, use and disclosure of your Personal Information over the past 12 months. Once we receive your request and verify your identity, we will disclose to you one or more of the following as requested:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- The categories of third parties with whom we shared that Personal Information.
- Our business or commercial purpose for collecting, using or disclosing that Personal Information.
- The specific pieces of Personal Information we collected about you.

### **Right to Delete Personal Information Collected or Maintained**

You may have the right to request that we delete certain of your Personal Information that we collected from you and retained, subject to certain exceptions (as described below). Once we receive your request and verify your identity, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception under the CPRA applies. We may deny your deletion request for the following reasons, which we will identify in our response if we deny your request:

1. Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.

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2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### **Right to Correct Personal Information**

- You have a right to request that we correct inaccurate personal information.

### **Right to Limit Use/Disclosure of Sensitive Personal Information**

- In certain circumstances you have a right to ask us to restrict the use and disclosure of your sensitive personal information. This applies if you contest the accuracy of the sensitive personal information (to allow us to verify its accuracy), the processing is unlawful but you do not want the information erased, it is no longer needed for the purpose for which we collected the information but is required by you to establish or exercise legal claims or defences, or because you have exercised your right to object and we are considering your request. Depending on the situation we may refuse your request, in particular if using this information is necessary for legal claims.

### **Right to Non-Discrimination for Exercise of Privacy Rights**

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

\*Northern Trust does not sell and has not sold your Personal Information to non-affiliated third parties in the preceding 12 months.

### **Business Contacts**

If you are a business contact of Northern Trust, such as an employee, owner, director, officer, or contractor of another business, we may collect personal information from you in connection with your relationship with us. Business contacts who are California residents may have certain rights regarding their personal information. To exercise your rights as a business contact, you can follow the steps set forth below in the Exercising Your Rights section..

### **Exercising Your Rights**

You may exercise your rights by calling 1-877-265-3729, Monday through Friday, 9:00 am to 10:30 pm Pacific Time and Saturday and Sunday, 9:00 am to 5:30 pm Pacific Time; by contacting us at [Privacy.Compliance@ntrs.com](mailto:Privacy.Compliance@ntrs.com).

Only you or a person registered with the California Secretary of State that 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.

### **Authorizing an Agent**

You may designate an authorized agent to submit your consumer request so long as the authorized agent has your written permission to do so and you have taken steps to verify your own identity directly with Northern Trust. If you could like to designate an agent, your agent must register as such with the California Secretary of State and submit a copy of this registration along with the consumer request to Northern Trust.

### **Verifying Your Request**

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. Where possible, we will only use Personal Information that Northern Trust already stores to verify your identity or authority to make the request.

To verify your identity, we ask that you to provide us with the following information when you submit your request:

- Name
- Account Number (if available)
- Email Address
- Depending on your type of request or the information requested by you, we may require additional information in order to verify your identity and fulfill your request.

We follow our standard client identification procedures, including the use of voice recognition, identifying questions or signature verification, to verify requests.

**Contact Information**

If you have any questions or comments about this CCPA Privacy Notice, the Privacy Notice of The Northern Trust Company, the ways in which we collect, use and share your Personal 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: [Privacy\\_Compliance@ntrs.com](mailto:Privacy_Compliance@ntrs.com).

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