

IMPORTANT PRIVACY NOTICE FOR U.S. CONSUMERS

LAST REVISED: December 31, 2020

This Privacy Notice for United States' Consumers ("Notice"), provided by Zedra Corporate Management Services, Inc. and Zedra Corporate Services, Inc, supplements, and is expressly made part of, the information contained in Zedra's Privacy Notice and applies solely to those consumers ("you" or "your") who are citizens of the United States ("US") or who we collected information from in the US. This Notice sets out how the member companies of the Zedra Group (each a "Zedra Company" and collectively "the "Zedra Group" or "we") collect, use and disclose your personal data and provides you with a means of exercising your privacy rights. As a company that conducts activities that are financial in nature, Zedra is a "financial institution" as that term is defined in the Gramm-Leach-Bliley Act ("GLBA"). Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

We reserve the right to amend this Notice at our discretion and at any time. When we make changes to this Notice, we will post the updated Notice on our website with the Notice's effective date and/or provide you with notice of the changes to this Notice. Your continued use of our services following the posting of changes constitutes your acceptance of such changes. You can determine when this Notice was last revised by referring to the "Last Revised" legend at the top of this page. We encourage you to review our website from time to time for changes to our Privacy Notice.

Definitions

This Notice contains certain terms that have defined meanings which you should be aware of:

Affiliates:

Companies related by common ownership or control. They can be Financial and nonfinancial companies.

- | Our affiliates include companies that utilize the Zedra name in providing our services to you and companies within the Zedra Group.

Nonaffiliates:

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- | Nonaffiliates we share with can include financial services companies such as insurance agencies and banks, nonfinancial companies such as regulators, lawyers, and other companies such as nonprofit groups.

Joint marketing:

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- | Our joint marketing partners may include financial services companies.

Types of Information We Collect and Disclose

We collect information about people and property as described below. Some of the information we collected is "**Nonpublic Personal Information.**" This refers to information that relates to you and is provided by you, obtained by us, or that results from your transaction with us. It does not include information available to the general public. The types of personal information we collect and share depend on the product or service you have with us. This information can include: (examples below are not necessarily a complete list):

- | Contact Information such as your name, date of birth, passport or national identity card details. This may also include identifiers such as country of birth, domicile and citizenship, gender, marital status, and racial or ethnic origin.
- | Locational and contact information such as residential or business address, email address and telephone number.
- | Information about your employment, education, family, personal circumstances, and interests.
- | Information relating to your tax affairs including tax identification number.
- | Information relating to your financial situation such as income, expenditure, assets and liabilities, sources of wealth and your bank account details.
- | Information about your investment knowledge and experience.
- | Information regarding your goals and objectives in connection with your wealth.
- | Information to assess whether you may represent a money laundering or terrorist financing risk, including whether you are a politically exposed person, or have had previous criminal convictions or regulatory sanctions imposed.

This personal information is collected in a variety of ways, for example:

- | When you communicate with us or when we communicate with you by telephone, fax, email or other forms of electronic communication. In this respect, we may monitor, record and store any personal data.
- | From the information and documentation that you provide at any time and from time to time including information and documentation provided at meetings.
- | From information collected in process of providing you with requested Services.
- | From your agents or advisers and employees of firms and intermediaries with which you are associated or who introduce you to us.

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons the Zedra Group chooses to share personal information and whether you can limit this sharing.

Parties To Whom We Disclose Information

Nonpublic Personal Information about you and our former customers may be disclosed to others as permitted by law. Generally, this includes disclosures to third parties that are necessary to effect, administer or enforce your transaction with us, or in connection with servicing our ongoing customer relations. These parties may include our group of affiliated companies, or their employees, agents or representatives, and courts and governmental agencies, and third parties. We reserve the right to also disclose your personal information to the following types of third parties (these are typically, but not always, companies that have a relationship with you), however you will have the opportunity to opt out of such disclosures before they are made:

- | Nonaffiliated financial service providers, such as banks, financing companies and insurance companies
- | Nonaffiliated Non-financial companies such as regulators, lawyers, and other companies such as nonprofit groups.
- | Affiliates may include both financial and non-financial companies. Our affiliated entities are defined above.

We may also disclose **Nonpublic Personal Information** about you and our former customers to companies that perform marketing services on our behalf or to financial institutions with whom we have joint marketing agreements. The Zedra Group cooperate with each other in their sales and marketing activities, and this Notice applies to the relationship between them. Accordingly, they may disclose **Nonpublic Personal Information** to each other. We are required to, or we may, provide information about you to third parties other than Zedra Group or related and affiliated entities without your consent, as permitted by law. For example:

- | To respond to a subpoena or court order, judicial process or regulatory authorities;
- | To consumer reporting agencies;
- | In connection with a proposed or actual sale, merger, or transfer of all or a portion of a business or operating unit;
- | To protect against fraud, and insure confidentiality and security;
- | To assist or be part of a proposed or actual securitization, secondary marketing sale (including sales of loan servicing rights), a loan hypothecation, or similar transaction related to a transaction of the consumer.

We may generally disclose information about you to service providers, including billing service providers, collection agencies, mail and telephone service companies, insurers, attorneys or other professionals. The below chart explains the reasons we share with the above referenced companies and whether you can limit such sharing:

Reasons we can share your personal information	Does ZEDRA share?	Can you limit this sharing?
For our everyday business purposes — such as to process your transactions, maintain your account(s), or respond to court orders and legal investigations.	Yes	No
For our marketing purposes — with service providers we use to offer our products and services to you.	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates’ everyday business purposes — information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes — information about your creditworthiness	Yes	Yes
For nonaffiliates to market to you	No	We do not share

Confidentiality & Security

We restrict access to Nonpublic Personal Information about you to those employees and other parties who must use that information to provide products or services to you. Their right to further disclose and use the information is limited by our employee code of conduct, applicable law, and nondisclosure agreements where appropriate. We also maintain physical, electronic, and procedural safeguards in compliance with applicable laws and regulations to guard your **Nonpublic Personal Information**.

Opt Out Rights

Federal law gives you the right to limit some but not all sharing related to:

- | affiliates’ everyday business purposes—information about your creditworthiness
- | affiliates from using your information to market to you
- | nonaffiliates to market to you

State laws may give you more rights to limit sharing. **See Important Information** section for your rights under state law.

If you do not want your Nonpublic Personal Information disclosed to nonaffiliated third parties, you may “opt out” of those disclosures, meaning that you may tell us not to make those disclosures (other than disclosures that are permitted by law even if you opt out). If you opt out, we will not disclose this information to nonaffiliated third parties that independently market products or services to you, but we may include their offers in billing statements and other routine communications that we send to you in connection with servicing your business relationship with us. Please note: When you are no longer a customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

To opt out, simply detach and mail, email, or hand deliver the form at the bottom of this Notice to the address or email address listed. If you choose to send the opt-out via email please indicate in the subject of the email that it is regarding a "Privacy Opt Out". An opt out election by you or others who maintain a relationship with our Company will be effective for all persons that your relationship relates to. Once you opt out, there is no need to do so again for the same business relationship.

Information For Vermont, California and Nevada Customers

In response to a **Vermont** regulation, we automatically treat accounts with Vermont billing addresses as if you requested that we not share your information with nonaffiliated third parties, and that we limit the information we share with our affiliates. We will not share information we collect about Vermont residents with companies outside of our corporate family, unless the law allows. For example, we may share information with your consent, to service your accounts. We will not share information about your creditworthiness within our corporate family except with your consent.

In response to a **California** law, we will not share information we collect about you with companies outside of the Zedra Group, unless the law allows. For example, we may share information with your consent, to service your accounts. We will limit sharing among our companies to the extent required by California law. California residents who are obtaining products or services from Zedra for personal, family, or household use are entitled to request and obtain from us, once per calendar year, information concerning what, if any, of their personal information Zedra has shared with third parties for their own direct marketing. If applicable, this would include the categories of information and the names and addresses of the businesses with which we shared information for the immediately preceding calendar year. To make a "Shine the Light" request, please email your name and complete address to DataProtection@zedra.com with "CA Shine the Light Privacy Request" in the subject line or write to us at: Zedra Corporate Services, Inc. 333 S.E. 2nd Avenue, Suite 2000, Miami, Florida 33131. Please note not all forms of information sharing are covered by California's "Shine the Light" requirements and only sharing that is covered will be included in our response.

In response to **Nevada** law, we are providing you this notice: You may be placed on our internal Do Not Call List by requesting that we cease calling you by contacting us directly and making such request in writing at DataProtection@zedra.com. Nevada law requires that we also provide you with the following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; Phone number: 702-486-3132; e-mail: BCPINFO@ag.state.nv.us. If you are a Nevada resident you may also request that we do not sell your personal information. If you are a Nevada resident and wish to make such a request regarding your personal information, please email us at DataProtection@zedra.com with "Nevada Privacy Request" in the subject of the email.

We typically maintain records for a minimum of five (5) years. For additional information regarding our privacy practices and legal or regulatory notices please review our Website, <https://www.zedra.com/>. If you have any questions or comments, you may find what you are looking for on our website at <https://www.zedra.com/> or you can email us at DataProtection@zedra.com or send a request/question to Zedra Corporate Services, Inc. 333 S.E. 2nd Avenue, Suite 2000, Miami, Florida, 33131.

(DETACH HERE)

Customer Opt Out Form

Mark any/all you want to limit:

Do not share information about me with your affiliates for their everyday business purposes

Do not allow your affiliates to use my personal information to market me

Do not share my personal information with nonaffiliates to market their products and services to me

Individual Name:

Address:

Company:

Mail or Deliver to:

Zedra Corporate Services, Inc.
333 S.E. 2nd Avenue, Suite 2000,
Miami, Florida, 33131

Email to:

DataProtection@zedra.com