

## IMPORTANT INFORMATION FOR CALIFORNIA CONSUMERS

This document provides specific information for California Consumers, as required under California privacy laws, including the California Consumer Privacy Act (“CCPA”). California privacy law requires that we provide California Consumers information about how we use their personal information, whether collected online or offline, and this document is intended to satisfy that requirement.

Under the CCPA, “personal information” is any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or household. We collect personal information through, 1) direct interaction with you and/or your agents, 2) account opening or updating documentation, 3) account custodian documentation, 4) consultants, and 5) our website.

### Categories of Personal Information that We Collect, Disclose, and/or Sell

Below please find the categories of personal information about California Consumers that we collect, and/or disclose to third parties or service providers for a business purpose in order to provide the investment management services for which we have been engaged. The third parties and service providers fall into the categories of 1) Financial Service Providers, 2) Financial Research Providers, and 3) Screening Services.

Vaughan Nelson DOES NOT sell Consumer’s personal information.

Category	Do we collect?	Do we disclose for business purpose?	Do we sell?
Identifiers such as 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.	<b>YES</b>	<b>YES</b>	<i>NO</i>
Signature, physical characteristics or description, telephone number, education, employment, financial information, medical information, or health insurance information.	<b>YES</b>	<i>NO</i>	<i>NO</i>
Characteristics of protected classifications under California or federal law such as race, color, sex, age, religion, national origin, disability, citizenship status, and genetic information.	<b>YES – Sex, Age</b>	<i>NO</i>	<i>NO</i>
Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	<b>YES – Products / Services</b>	<i>NO</i>	<i>NO</i>
Biometric information.	<i>NO</i>	<i>NO</i>	<i>NO</i>
Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a resident’s interaction with an Internet Web site, application, or advertisement.	<i>No</i>	<i>NO</i>	<i>NO</i>
Geolocation data.	<i>NO</i>	<i>NO</i>	<i>NO</i>
Audio, electronic, visual, thermal, olfactory, or similar information.	<i>NO</i>	<i>NO</i>	<i>NO</i>

Professional or employment-related information.	<b>YES – AML purposes</b>	NO	NO
Education information	NO	NO	NO
Inferences drawn from any of the information identified above to create a profile about a resident reflecting the resident’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO	NO	NO

**California Consumers’ Rights**

California law grants California Consumers certain rights and imposes restrictions on particular business practices as set forth below.

**Do-Not-Sell.** California Consumers have the right to opt-out of the sale of their personal information. Vaughan Nelson DOES NOT sell Consumer’s personal information.

**Requests for Right to Know and Deletion.** Subject to certain exceptions, California Consumers have the right to make the following requests, at no charge, up to twice every 12 months:

1. **Right to Know Categories:** the right to request that we provide you certain information about how we have handled your personal information in the prior 12 months, including:
  - The categories of personal information collected.
  - The categories of sources of personal information.
  - The business and/or commercial purposes for collecting and/or selling your personal information. (Vaughan Nelson DOES NOT sell your personal information)
  - The categories of third parties with whom we have disclosed or shared your personal information
  - The categories of personal information that we have disclosed or shared with a third party for a business purpose.
  - The categories of third parties to whom your personal information has been sold and the specific categories of personal information sold to each category of third party. (Vaughan Nelson DOES NOT sell your personal information)
2. **Right to Know Specifics:** the right to request a copy of the specific pieces of personal information that we have collected about you in the prior 12 months.
3. **Deletion:** the right to request deletion of your personal information that we have collected about you, subject to certain exemptions (for example, where the information is used by us to detect security incidents, for debugging, or to comply with a legal obligation).

**Discrimination.** The CCPA prohibits discrimination against California Consumers for exercising their rights under the CCPA. Discrimination may exist where a business denies or provides a different level or quality of goods or services, or charges (or suggests that it will charge) different prices or rates or impose penalties on Consumers who exercise their CCPA rights.

**Submitting Requests.** Requests to exercise the right-to-know or the right to deletion may be submitted on our California Consumers’ Rights Page [www.vaughannelson.com/ccpa\\_form.html](http://www.vaughannelson.com/ccpa_form.html), by contacting us at 888.888.8676 (toll free), or by contacting your client service representative.

### **California Privacy Rights under California's Shine-the-Light Law**

Under California's "Shine the Light" law (Cal. Civ. Code § 1798.83), California Consumers who provide us certain personal information are entitled to request and obtain from us, free of charge, information about the personal information (if any) we have shared with third parties for their own direct marketing use. Such requests may be made once per calendar year for information about any relevant third party sharing in the prior calendar year.

Vaughan Nelson DOES NOT share or sell Consumer's personal information to third parties for their own direct marketing use.