

Rockefeller Capital Management Online Privacy Policy

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Rockefeller Capital Management and its affiliates, including Rockefeller & Co. LLC, Rockefeller Financial LLC, Rockefeller Capital Management Insurance Services LLC, Rockefeller Trust Company, N.A., The Rockefeller Trust Company (Delaware) and the investment vehicles each manage and/or administer (collectively “**Rockefeller**”, “**we**”, “**us**” or “**our**”) respect your privacy, as well as the privacy and sensitivity of information relating to legal matters, and we are committed to protecting individuals’ information.

This Privacy Policy (this “**Policy**”) describes the types of information we collect, how we collect information, what we do with information that we collect, and how you can contact us with any questions about our information practices or to access or request changes or updates to information concerning you.

Please review this Policy carefully to understand our practices and treatment of information. If this Policy is unacceptable to you or if you do not agree with our information policies or practices, you may choose not to visit or use this website or any services offered through this website.

Scope

This Policy applies to information that we collect through (1) our public website, at <https://rockco.com/>, and any of our other websites that provide a link to this Policy, including all of our products and services provided through those websites (collectively, the “**Site**”), and (2) our Mobile Application (the “**App**”), at <https://clientonline.rockco.com>, in each case, from you as an individual user (“**you**”) of the Site and/or App. The Site and App are, together, the “**Services**.”

This Policy does not apply to information collected by other means, including information collected by websites, content or applications of third parties, including any that may be linked to or accessible from or on the Services. Some of the products and services we provide may refer you to third party apps or websites, or we may refer you to a third-party website if you request certain products or services. However, this Policy does not apply to any information collected by those third party apps or web sites, regardless of whether we refer or direct you to those apps or websites. We encourage you to read any applicable third-party privacy policies or disclosures before providing information on or through them.

For additional information about how we collect, use, and disclose nonpublic personal information in the course of providing financial products or services to you for your personal, family, or household purposes, please see our Privacy Notice here.

Information We Collect and How We Collect It

We collect and maintain personal information so we can provide you with wealth and investment management, investment advisory, information management and/or family office services, as well as to manage our business. The types and categories of information we collect about you might include, for example:

Information You Provide to Us. If you communicate with us through the Services, we may ask you to provide certain information about yourself, such as your name, email address, phone number, employer or organization, professional role, financial and/or tax information, Social Security number or similar information.

For example, if you request information from us, open an account or request investment products or services, we may ask you to provide certain information such as the foregoing examples.

Information We Collect About Your Transactions. When you use or access the Services to initiate or conduct financial transactions, we may collect information about your transactions to provide services to you (such as trade confirmations and account statements). We may also collect information about your experience with Rockefeller relating to our products and services.

Information We Collect Automatically. As part of the standard operation of the Site, we automatically collect information from your computer or device, such as IP address, domain name (that you visited from www.company.com, for example), referral or exit data (the last website that you visited before visiting the Site and the next website you visit afterwards, respectively), as well as browser and platform type (a Google browser or an Apple platform, for example). We also collect information about how you use the Site, such as the date and time of your visit, the amount of time you spend on the Site, how often you visit the Site, the areas or pages that you spend the most time on, and other click-stream data. Information collected automatically is generally statistical data and generally does not identify you personally.

Cookies, Beacons, and Tags. A cookie is a small text file that is stored on your computer or device when you access the Site. We use cookies on the Site in order to collect the information described above, and also to remember your settings and for authentication. You can manage the use of cookies through your browser. You may still use the Site if you reject cookies, but it may limit your ability to use some areas of the Site or otherwise diminish your experience of the Site. You can learn more about cookies at our Cookies Statement at <https://www.rockco.com/CookiePolicy> or at Your Choices below.

Google Analytics. We use Google Analytics to collect information about use of the Site. Google Analytics collects information such as how often users visit the Site and what pages users visited prior to visiting the Site. We use this information to maintain and improve the Site. The information generated by Google Analytics will be transmitted to and stored by Google, and that information will be subject to Google's privacy policies (available at <http://policies.google.com/privacy>). You can opt out of Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout> and learn more at Your Choices below.

In addition, with the assistance of our third-party partners and service providers, we may use technologies such as web beacons, tags, Flash cookies or HTML5 to collect or use information about visitors to the Site and their actions on the Site. For information about opting out of or managing the collection or use of such information, please see Your Choices below.

The Site does not respond to "do-not-track" requests or similar browser settings.

How We Use Information We Collect

We use information that we collect, including your personal information, for the following purposes:

- To present the Services and their contents to you.
- To provide any information, products, or services that you may request from us or access through the Services, including services for your account and your financial transactions.
- To maintain and improve our content, Services, or any of our products or services, for example by analyzing information about how the Services is used to identify pages, features and topics of interest.

- To respond to your questions or requests for information, or to fulfill any other purpose for which you provide your information to us through the Services.
- To provide you with information about any of our services, updates, editorial content, industry education, invitations to upcoming events, and similar information.
- To better understand how visitors use the Site and the performance of the Site, including measuring and monitoring user traffic and using aggregate statistical analysis, which informs future enhancements and changes to the Site, or by combining information collected through the Site with information about our customers collected by other means.
- To comply with law or for other legal purposes, including retaining information to comply with law or regulations or disclosing information to a court, regulator, or other third party in response to a valid request.
- To protect ourselves or others, including protecting against malicious, deceptive, fraudulent, or illegal activity; or protecting our rights and those of customers, partners, employees, or investors and defending any claims made against us.
- For any other purpose that we describe at the time we collect your information.
- For any other purpose with your consent.

In addition to these uses, we may combine information about you that is collected through the Services with information about you which is collected from third parties with respect to your account, such as trade confirmations from brokerage firms, financial account information for aggregation purposes, bank statements, transaction details or information from other financial services providers.

Disclosure of Your Information

We may disclose aggregate statistical information about visitors to the Site, which does not identify individual users, without restrictions.

Personal information about you, that you provide or that we collect as described in this Policy, may be disclosed to third parties as follows:

- To deliver any information, products, or services to you that you request, or otherwise to fulfill a contractual obligation to you. For example, we may disclose your personal information to third parties such as investment custodial institutions and in connection with furthering your investment goals, such as providing necessary information about you to facilitate your making investments or receiving services. We may also disclose your personal information to third parties as necessary to verify, submit and complete financial transactions that you request, such as money transfers, bill payments and financial account management.
- To third parties such as auditors and tax service providers as needed to service your account.
- To contractors, agents, service providers and other third parties we engage to support our business, such as technology consultants who assist us in maintaining or operating our computer and

duplicating systems, who are bound by confidentiality obligations and may use such personal information only on our behalf.

- With your consent.
- As otherwise described in this Policy.
- For any other purpose disclosed by us when you provide the information.

We may also disclose personal information about you for the following purposes:

- As required by law, court order or legal process, including in response to a subpoena or a request from a government agency, or to cooperate with law enforcement investigations.
- To enforce our contractual rights, take precautions against liability, investigate suspected or actual illegal activities, or to investigate and defend ourselves against third-party claims or allegations.
- To a buyer or other successor in the event of a merger, restructuring, reorganization, or other sale or transfer of some or all of our assets, including, but not limited to, as part of a bankruptcy, liquidation, or similar proceeding, in which personal information held by us about users of the Site is among the assets transferred.
- When we believe that disclosure is necessary or appropriate to protect the rights, property, or personal safety of ourselves, our customers, or others.

Whenever we disclose personal information to a third party, we seek to minimize the disclosure to only information that is necessary for the purpose of that disclosure.

How Long We Hold Your Information

We will retain the personal information that we collect about you for as long as needed to fulfill the purpose for which we collected your information or to provide our Services to you.

We may also retain personal information about you for a reasonable time for our internal business purposes, including for backup, archival, reactivation or audit purposes, or as needed to comply with our legal obligations, resolve disputes or enforce our agreements. If you have any questions about how long we may keep personal information about you, please contact us as described at [Contact Us](#) below.

International Transfers of Personal Information

For the purposes described in this Policy, we may transfer information across borders, including from your country or jurisdiction to other countries or jurisdictions around the world, where applicable laws may not provide the same level of protection of personal information as the laws of the country or jurisdiction where you are located. In those cases, we take steps to ensure that information will be provided the same level of protection in the recipient country or jurisdiction.

By visiting the Site or using the Services, you hereby consent to the transfer of your personal

information to countries where applicable laws may not provide the same level of protection of personal information as the laws of the country or jurisdiction where you are located, including, without limitation, the United States, in accordance with this Policy.

Accessing and Requesting Changes to Your Information

If you have registered with the Services, you can review and change certain personal information, such as your phone number and email, on your account profile page. However, please contact your Private Advisor if you would like to review and change any other personal information.

You may also contact us as described below at Contact Us to make a request to access, correct, update, or delete personal information about you that we may hold. In responding to your request, we may request information from you and use information previously collected to verify your identity, or take other actions that we believe are appropriate.

In some cases, we will not be able to delete your personal information except by also deleting your user account.

Please understand that we may not be able to alter or delete your personal information if we are required under applicable law to maintain that information. We are also not obligated to comply with requests that are unreasonably burdensome or expensive, or with requests that would interfere with the rights of another individual. In some circumstances, we may charge a reasonable fee to fulfill your request.

Your Choices

You have certain choices about how your personal information is collected, used and shared. Although you may not be able opt out of all collection or use of personal information and still use the Services, you can take steps to limit or control how your personal information is collected, used and shared.

Emails. To opt out of receiving promotional or marketing emails from us, you may click on the “unsubscribe” link at the bottom of our emails.

Cookies. You can control or delete cookies, or otherwise manage cookies, through your browser or device settings. For more details, please visit <https://www.allaboutcookies.org> or <https://www.aboutcookies.org>. Please understand, however, that you may be unable to use all of the functionality of the Site or our services if you choose to reject cookies.

To learn more about cookies, please see our Cookies Statement at <https://www.rockco.com/cookiepolicy>.

Security

We take reasonable steps and follow generally accepted industry data practices to protect personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. Unfortunately, there is no completely secure or error-free method of data transmission over the Internet, and we cannot guarantee the absolute security of your personal information. Any transmission of personal information is at your own risk.

Optional Data Aggregation Services

Rockefeller, like many similar companies, offers account aggregation services that allow you to consolidate your online financial account information from different sources (such as your accounts with us or with other financial institutions) so that you can view all your account information in one online location.

When acting as an account aggregator, Rockefeller or its aggregation service provider may request your account user credentials for third-party (non-Rockefeller) financial accounts, including usernames and passwords, in order to access your account information as your agent.

You may cancel enrollment in Rockefeller's aggregation service or delete accounts at any time. Upon cancellation or deletion of an account, we will delete and direct our service provider to delete this data from our and their respective records as permitted under applicable law, rules and regulations.

Children's Privacy

The Services are not intended for children under the age of 13, and we do not knowingly collect or solicit personal information from children under the age of 13. If we learn that we have collected or received personal information from a child under 13, we will delete that information.

If you believe that we may have collected any personal information from a child under 13, please inform us by contacting us as described at [Contact Us](#) below.

Changes to Our Privacy Policy

We may update our Policy from time to time to reflect changes to our information practices and how we treat the personal information of visitors to the Site and users of the Services. If we make material changes to our Privacy Policy, we will notify you by updating the date the Policy was last revised. We encourage you to periodically review this page to learn of any changes we have made to this Policy.

The date our Policy was last revised is identified at the top of the page. You are responsible for periodically visiting this Policy to check for any changes.

Contact Us

Please feel free to contact us with any questions, comments, complaints, or suggestions regarding this Policy or our information practices. You can contact us by postal mail at:

Rockefeller Capital Management
Attn: Privacy Officer
45 Rockefeller Plaza, Floor 5
New York, NY 10111

You may also contact us by telephone at 1-888-732-4525 or by email at privacynoticeoptoutrequest@rockco.com.

For Residents of California

This section of the Policy applies to residents of the State of California. We adopt this notice to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “CCPA”), and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this section of the Policy.

We collect information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”). We retain such information as described in the “How Long We Hold Your Personal Information” section above.

Below are the categories of personal information that we have collected about consumers within the last twelve (12) months. The examples below are given only to provide a meaningful understanding of the category; not all examples are necessarily collected by every Rockefeller entity or for a given consumer group or across all such groups.

Category	Examples	Collected
A. Identifiers.	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.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES

E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	YES
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO
L. Sensitive personal information	<p>Personal information that reveals:</p> <ul style="list-style-type: none"> • Social Security, driver's license, state identification card, or passport number. • Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account. • Precise geolocation. 	YES

For purposes of this section of the Policy, personal information does not include:

- Publicly available information or lawfully obtained, truthful information that is a matter of public concern.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, like:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - 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), and the Driver's Privacy Protection Act of 1994. Please see our Privacy Notice here for details about how we collect personal information subject to GLBA and FIPA.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from documents and information that you provide to us related to the products and services you request from us, including those requested through the Services.
- Indirectly from you. For example, through information we collect from you in the course of providing the products and services you request from us.
- Directly and indirectly from activity on the Site. For example, from submissions through the Site or website usage details collected automatically.
- From third-parties that interact with us in connection with the services we perform. For example, from third parties who provide information or services in connection with your account or products or services you request from us.

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to initiate a financial transaction, we will use that information to verify, submit and complete that transaction. Such transactions may include, for example, money transfers and bill payments.
- To provide you with information, products or services that you request from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.

- To improve the Services and present their contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose to the following categories of third parties:

Category	Categories of Entities to Whom We May Disclose Personal Information for Business Purposes
A. Identifiers.	Our affiliates. Service providers. Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide you.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Our affiliates. Service providers. Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide you.
C. Protected classification characteristics under California or federal law.	Our affiliates. Service providers. Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide you.

L. Sensitive personal information	Our affiliates. Service providers. Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide you.
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In the preceding twelve (12) months, we have not sold or shared (as the word “share” is defined in the CCPA) your personal information.

We do not sell or share the personal information of anyone under the age of 16.

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know & Access. You have the right to request that we disclose certain information to you about our collection and use of your personal information. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting, selling, or sharing that personal information.
- The categories of third parties to whom we disclose that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or shared your personal information, or disclosed your personal information for a business purpose, we will also disclose:
 - the categories of personal information we have sold or shared and the categories of third parties to which we sold or shared each category of personal information; and
 - the categories of personal information we have disclosed for a business purpose and the categories of third parties to which we disclose each category of personal information for a business purpose.

Right to Delete. You have the right to request that we delete any of your personal information that we collected from you and retained, subject to our obligations to comply with applicable law, rule or regulation.

Right to Correct. You have the right request that we correct inaccurate personal information that we maintain about you.

Exercising Your Rights

To exercise the rights described above, please contact us as described at [Contact Us](#). Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a request to exercise rights related to your personal information. You may also make a rights request on behalf of your minor child.

You may only make a request for access to your personal information or data portability twice within a twelve (12)-month period. The request must:

- Provide sufficient information, such as your account number, that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We will attempt to match the information you provide with the information we have on file in order to verify your identity. In some cases, we may need to contact you for additional information. We cannot respond to your request or provide you with personal information if we cannot verify your identity or, if you are an authorized agent or parent/guardian, your authority to make the request.

Non-Discrimination

You have the right not to receive discriminatory treatment 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.