

Rockefeller Capital Management Privacy Notice

In the course of serving you as an individual client or someone associated with a corporate or institutional client, Rockefeller Capital Management and its affiliates (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 they manage or administer) (collectively, "Rockefeller Capital Management") may need to obtain personal information about you. Obtaining this information is important in our ability to deliver the highest level of service to you, but we recognize that your personal information must be treated appropriately. This policy describes the types of personal information we may collect about you, the purpose for which we use the information, the circumstances in which we may share the information and the steps taken to safeguard the information to protect your privacy.

TYPES OF INFORMATION COLLECTED. Rockefeller Capital Management collects and maintains personal information so we can provide you with wealth and investment management, investment advisory, investment 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 we receive primarily comes from account applications or other forms and materials you submit or provide us so that we may open an account for you or provide investment products and services during the course of our relationship. Typical information may include, but is not limited to: your name, address, email address, telephone number, birth date, a personal identifier (Social Security Number or TIN/EIN), marital status, occupation, a government issued ID, source of wealth, financial and tax information and investment and estate planning goals;
- Information about your transactions that we generate to service your account (such as trade confirmations and account statements), as well as information about your experience with Rockefeller Capital Management relating to the products and services we provide you;
- Information received from third parties with respect to your account (such as trade confirmations from brokerage firms, or bank statements or information from other financial services firms).

Please note that providing us with your personal information is not required but failure to provide us with this information may result in our being unable to open or maintain your account or provide the products or services. In addition, while we make every effort to keep current and complete all information that we maintain about you and your accounts, by promptly notifying us if there are any changes to your personal account information will help us considerably to service you better.

USE OF YOUR PERSONAL INFORMATION. Rockefeller Capital Management may use your personal information to:

- Open, administer, operate, facilitate and manage your relationship and/or account;
- Contact you or, if applicable, your designated representative(s) by post, telephone or electronically regarding your relationship and/or account;

- Provide you with information, recommendations or advice concerning products and services offered by Rockefeller Capital Management; and
- Facilitate our internal business operations, including assessing and managing risk and fulfilling our legal and regulatory requirements.

Please be advised that if your relationship with us ends, we will continue to treat your personal information, as described in this policy to the extent we retain it.

THIRD PARTIES AND YOUR PERSONAL INFORMATION. We know that you value your privacy, and so we do not disclose your personal information to unaffiliated third parties unless it is required or permitted by law (e.g., responding to a governmental authority), directed by you, or necessary to provide our services to you and/or your accounts as described in this policy.

Rockefeller Capital Management does not sell client personal information to anyone.

As stated above, unless required or permitted by law, we do not disclose personal information about our clients or former clients to nonaffiliated third parties except in order to enable us to provide our wealth and investment management, investment advisory, information management and family office services to you. Examples of such disclosures might include:

- Disclosures to third parties in connection with furthering your investment goals (such as providing necessary information about you to facilitate your making investments or receiving services; examples of such third parties would include investment sub-advisors, custodial institutions and brokerage houses);
- Disclosures to third parties needed to service your account (such as providing information to auditors and tax service providers); and
- Disclosures to third parties, who themselves are subject to confidentiality requirements, that perform or provide services for us or on our behalf involving your account information (such as technology consultants who assist us in maintaining or operating our computer and duplicating systems).

We maintain policies and procedures directed towards preserving the privacy of the personal information that we collect and maintain. These safeguards are designed to assure the security and confidentiality of your records and personal information, to protect against foreseeable threats or hazards to the security of this information and to protect against its unauthorized use. These measures include:

- Physical, electronic and procedural safeguards to keep personal information secure; and
- Requiring third parties to whom disclosures of personal information are made to maintain the confidentiality of that information.

CHANGES OR UPDATES TO THIS POLICY. This policy may be changed or updated from time to time to reflect changes in law and/or practices concerning the collection and use of your personal information. The revised policy will be effective immediately and will be posted on our website. Should you have any questions regarding this Policy, please contact your Private Adviser.

This Notice is effective as of: April 30, 2023.