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BESSEMER TRUST PRIVACY POLICY

ON-LINE PRIVACY POLICY	CPRA PRIVACY POLICY	GDPR PRIVACY POLICY
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Last Updated: April 1, 2024

Bessemer Trust (“Bessemer” or the “Company”) is committed to maintaining the privacy and security of your personal information consistent with applicable privacy and data protection laws. This On-line Privacy Policy (“Privacy Policy”) explains what and how we may collect, process, use, disclose, and protect your personal information, who it may be disclosed to, and provides information on your individual privacy rights when you visit or use our public website (www.bessemertrust.com) (the “Site”).

Other privacy policies could apply depending on how you interact with us, the financial products or services you may ultimately obtain from us, or the jurisdiction in which we are doing business with you.

If you are a California resident, you may have rights under the California Privacy Rights Act as described in our Notice of Collection of Personal Information and Privacy Policy (“CPRA Privacy Notice”). Please see our CPRA Privacy Notice for additional disclosures and privacy protections concerning your use of the Site for California Residents. Similarly, European Union and United Kingdom residents may have specific privacy rights under the U.K. and E.U. General Data Protection Regulations (collectively “GDPR”).

We may update this Privacy Policy at any time by posting the amended version on the Site with the effective date of the updated version. By using our Site or requesting information from us after we make such changes to this Privacy Policy, you are deemed to have accepted such changes.

How do we safeguard or protect your information?

We take our responsibility to protect the privacy and confidentiality of your information, including personal information, seriously. We maintain reasonable physical, electronic, and procedural safeguards and follow generally accepted industry data practices that comply with applicable legal standards to protect personal information about you from accidental loss and from unauthorized access, use, destruction, alteration and disclosure.

How does the Gramm-Leach-Bliley Act protect my non-public personal information if I am a client?

If you are a client, your privacy rights in connection with your non-public personal information are governed by the Gramm-Leach-Bliley Act (“GLBA”). In accordance with law, our GLBA Notice governs your privacy rights once you become a client of Bessemer Trust, including your use of our client portal, and our collection, use and disclosure of your non-public personal information protected under the GLBA.

Do we sell your personal information for advertising or other purposes?

Bessemer Trust does not sell your personal information or share your personal information with third party advertising vendors for purposes of targeting you with advertising based on tracking your online activity across different websites.

What personal information is covered by our On-Line Privacy Policy?

“Personal Information” means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with an identified or identifiable natural person. Personal information does not include publicly available information or information that is de-identified or aggregate consumer information.

We collect your personal information when you provide it voluntarily to us. By using our Site, viewing our online briefing materials and other content (including our educational videos) or submitting your personal information to us, you consent to the collection, processing, use, and disclosure of your personal information as set forth in this Privacy Policy, as it may be updated from time to time. We may also automatically collect personal information about you and your devices or browser in connection with your visit to our Site using cookies and similar technology. Our technology may, for instance, automatically identify your device or browser in connection with the particular web page you access on the Site that may contain written materials or a video. We may also aggregate personal information across our Site visitors to track trends and analyze patterns on the Site.

What types of personal information do we collect on this Site?

The nature of the information that we collect depends on our relationship with you, the services provided, and applicable law. We may collect, process, use and disclose the following types of personal information in connection with your use of our Site or when you communicate with us, including through online forms or on our private client website.

- **Contact Data:** Name, mailing address, telephone number, email address.
- **Profile Data:** Username and password for our online services that you have access to, investments made by you, services requested, marketing communications, responses to surveys.
- **Financial Data:** Account number, client reference number; account statements, investment history.

- Professional Information Data: Position or job title, business address, business telephone number, business email address.
- Services Data: Details of services provided to you and payment details to and from you as part of accessing or using our Services.
- Technical Data: Your use of and interaction with our online services through your IP address, including browsing history, searches, page and video views, and other similar information regarding your session on our Site.
- Sensitive Personal Information: In limited circumstances, we may collect sensitive personal information, when legally required or in seeking to accommodate your specific needs; for example, like dietary requirements, if we are arranging catering, or disability, to make reasonable accommodations for you in our buildings.

What types of cookies and other technologies do we use to automatically collect your personal information?

Our Site uses “cookies” and similar technologies to analyze your visits to our Site, and to improve and customize your browsing experience. Other cookies are necessary for the Site to function properly. By accessing and using our Site, you consent to our use of all cookies and similar technologies. You can choose whether to accept cookies by changing the settings on your browser. Please consult your Internet browser’s documentation for information on how to do this. However, if you choose not to accept functional or necessary cookies, the Site may not function properly and some features may not work as they were intended.

For analytics of our Site, we use Google Analytics, a web analytics service provided by Google, Inc. Google Analytics may set cookies on your browser or read cookies that are already there to collect information concerning your Site visit to help us analyze usage of our Site. We use the information provided by Google Analytics to improve our Site and your user experience. For more information regarding how Google Analytics collects and uses your personal information please visit <http://www.google.com/policies/privacy/partners/>. By using our Site, you consent to the processing of data about you by Google as described here and in Google’s privacy policy. You can control the information provided to Google by using one of the methods set forth in <http://www.google.com/policies/privacy/partners/> or use the Google Analytics opt out browser add-on at <http://tools.google.com/dlpage/gaoptout?hl=en>.

When you communicate with us by email, we may embed a tracking pixel in the email we send to you to determine whether you have opened it. Our website uses Session and Persistent Cookies to permit us and our website service partners to:

1. Measure your use of our website in an effort to improve its quality and enhance your overall experience, including tracking page views, time and date of website access, and other usage and navigation data, and identifying your operating system and browser type (but not other information about your computer or the files or programs on it) and your general geographic location; and
2. Aggregate usage data to track trends and analyze patterns on the website.

If you do not wish to accept Cookies from our website, please either disable them or refrain from using this website. If Cookies are disabled, it may mean that you experience reduced functionality or will be prevented from using all or part of this website.

Most browsers are initially set to accept Cookies. However, you have the ability to change your browser settings. It may also be possible to configure your browser settings to enable acceptance of specific Cookies or to notify you each time a new Cookie is about to be stored on your device enabling you to decide whether to accept or reject the Cookie. You can also disable Cookies by configuring your browser setting to reject Cookies. Please refer to the help section of your browser for instructions on disabling Cookies.

What are our business reasons for collecting, processing, using and disclosing your personal information?

Depending on the individual circumstances, we collect, process, use and disclose personal information for legitimate business purposes. These purposes may include:

- to communicate with you and respond to your inquiries.
- to provide you with educational materials and other information regarding our services.
- to show you educational videos.
- to market services tailored to your interests.
- to analyze and improve the functionality and effectiveness of our Site.
- to determine the general geographic regions where visitors to our Site are located.
- to protect the security of our Site.
- to prevent, detect and investigate fraud.
- to fulfill the purpose for which you provided us with your personal information.
- to comply with our legal obligations.
- to improve our services and products.
- to further our other legitimate interests, including to make available and highlight content and opportunities that are relevant to you and other visitors to our Site.

To whom do we disclose your personal information?

We do not sell your personal information to third parties.

We share personal information with affiliates and with others when we believe it will enhance the services and products we can provide to you or for legal and routine business reasons. For example, we may retain third party companies and individuals to perform functions on our behalf, including, but not limited to, web hosting platforms, technology services, customer service providers, video content providers, website analytics providers, platform providers, and shippers. Such outside organizations and individuals may be provided with access to your personal information to perform the functions for which they have been retained. For example, if you view a video on our Site, you consent to your personal information being shared with the outside organization we use to enable

videos on our Site. The Company requires its service providers, who provide services on our behalf to maintain the privacy and security of your personal information.

We may disclose your personal information to our affiliates and others for legitimate business purposes to provide you with services and products made available on this Site.

We may disclose any information, including personal information, we deem necessary, in our sole discretion, to comply with any applicable law, regulation, legal process or governmental request, to protect ourselves from fraudulent or illegal activity, and to defend against legal claims.

How long do we store your personal information?

We do not retain your personal data for longer than is necessary to fulfill the business purposes for which the information is being collected or processed or in order to comply with applicable legal or regulatory requirements.

What are your options regarding your personal Information?

You have choices about how we use your personal information to communicate with you and send you marketing information. You can opt out from receiving future marketing communications from us at any time by:

- Using the unsubscribe function in the email or marketing information you receive from us; or
- Contacting us as set forth under “*How to contact us*” below.

In addition, you have choices available to you through the device or browser you use to access the Site regarding your cookies and other browser settings. For information about privacy settings on your browser, see, for example, [Google Chrome](#). You may also change the settings on your mobile device, which lets you choose how and whether your approximate geographic location is shared with us. See, for example, [Apple](#).

What is our policy on children’s personal information?

Our Site is not intended for use by children under thirteen [13] years of age. We do not knowingly collect or use personal information from children under thirteen [13]. No one under age thirteen [13] may provide any information to us through the Site. If you are a parent or a legal guardian, and you reasonably believe that your child under thirteen [13] provided us with any personal information on the Site or on or through any of its features without parental consent, please contact us marking your inquiry “COPPA Information Request.”

Does our Privacy Policy apply to links to other websites and services?

The Site may have links to third-party websites that are not operated by us. We have no control over how these third-party websites may collect your information and no liability for the practices,

policies and security measures implemented on these websites or for their content. Our Privacy Policy does not apply to third-party websites. You should read the privacy notices on those other websites before you submit your information through them.

Do we honor “Do Not Track” requests or Global Privacy Controls?

We do not presently recognize browser “do not track” requests or Global Privacy Controls. As noted above, we do not sell your personal information to third parties or share your personal information for purposes of targeting you with ads based on your online activity at other websites.

How do you contact us?

If you have any questions about this Policy or our use of your personal information, please send us an email at [\[email protected\]](#). You may also contact us at [\(888\) 811-8417](#) or by mail at:

Attention: Legal Department
Bessemer Trust
1271 Avenue of the Americas
New York, NY 10020
United States

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