

Stifel and its subsidiaries (collectively, “Stifel”) are making this disclosure to comply with certain California laws, including the *California Consumer Privacy Act of 2018* (“CCPA”) and the *California Online Privacy Protection Act of 2003* (“CalOPPA”). Terms defined in such laws have the same meaning when used here.

This privacy policy supplements Stifel’s general privacy notice (available at www.stifel.com/disclosures/privacy-notice), but in case of any inconsistent provision, this policy overrides the general notice. Stifel may update this policy periodically; in such cases, Stifel will notify consumers of the changes by posting the updated policy on its website.

General privacy practices

Indicated below are the categories of personal information that Stifel has collected from consumers during the last 12 months. Stifel may collect the same categories at various points online or offline. Consumers could be either clients or employees of Stifel, or other groups of California residents. The examples below are only to provide a meaningful understanding of the category; not all are necessarily collected for a given consumer group or across all such groups.

CCPA-Defined Category	Description	Collected?
A. Identifiers	A real name, alias, postal or e-mail address, unique personal ID, online ID, IP address, account name, social security number, government-issued ID number, and other similar identifiers.	Yes
B. Categories listed in California Civil Code § 1798.80(e)	Signature, physical characteristics/description, telephone number, insurance policy number, bank account number, credit/debit card number, or any other financial information, medical information, or health insurance information. <i>(Overlaps with other categories have been excluded.)</i>	Yes
C. Protected classification characteristics under California or federal law	Race, color, religion/creed, national origin or ancestry, marital status, medical condition, physical/mental disability, age (40 years or older), citizenship, sex (including gender, gender identity/expression, pregnancy or childbirth), sexual orientation, veteran or military status, 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	Physiological (e.g., fingerprint), biological, or behavioral characteristics.	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.	No
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	Yes
I. Professional or employment-related information	Current or past job history or performance evaluations.	Yes
J. Non-public education information	Education records directly related to a student maintained by an educational institution or party acting on its behalf.	No
K. Inference from other personal information	Reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No

For each category Stifel collected or generally collects, as indicated above, the following three points apply.

- **Categories of sources the personal information is collected from:** Consumers or agents; Stifel’s affiliates, service providers, and joint marketing partners; independent financial and other professional advisers; product providers; event organizers; government entities; consumer data resellers; publicly available databases.

- **Business or commercial purposes for collecting the personal information:** To fulfill the reasons consumers provided the information; to provide or promote a financial product or service; to audit; to offer employment-related benefits or assistance; to create, maintain, or customize accounts; to verify identity or ensure security; to develop or improve products; to carry out contractual obligations; to protect the rights of various parties; to improve website performance or content; to conduct reorganization activities.
- **Categories of third parties (different from service providers) the personal information is shared with:** As directed by the consumer to fulfill an obligation Stifel has; as required by law to respond to law enforcement requests, legal processes, or court orders.

Online collection

Stifel does not collect personal information online unless consumers choose to provide it while using Stifel’s websites or online services (including mobile applications). Stifel’s customers wishing to change the content of the personal information they previously supplied online may do so either by contacting their local Stifel subsidiary branch or by updating it themselves on some of Stifel’s websites and online services that permit doing so.

Although some internet browsers have incorporated Do Not Track (“DNT”) features, Stifel does not currently respond to DNT signals because Stifel does not collect personal information online unless the customer voluntarily submits it and also because of a lack of industry standard about DNT.

Stifel does not allow other parties to collect personal information about its customers’ individual online activities over time or across different websites. Stifel cannot, however, guarantee protection from web-based criminal conduct that could result in the collection of a customer’s personal information by an outside party.

Consumer rights

Following are the key rights the CCPA has created for consumers. The last two are not Stifel for reasons noted.

- 1) Right to know what personal information Stifel has collected about the consumer from any source over the previous 12-month period. A consumer may exercise this right up to twice during a 12-month period.
- 2) Right to request deletion of the personal information Stifel has collected from the consumer.
- 3) Right to opt-out of sale of personal information. Stifel does not and will not sell personal information.
- 4) Right to non-discrimination for exercising any above right. Stifel does not discriminate for such reason.

To exercise the first two rights listed above, consumers may submit a verifiable request in one of two ways:

- By filling out a form at www.stifel.com/privacy/california-request
- By calling the toll-free number (833) 817-6594

Request verification and fulfillment

After receiving a request, Stifel attempts to verify it over the phone. The requestor must provide certain information to prove that he or she is the same person as the consumer referred to in the request. Such information varies depending on the nature of the request and other factors as stipulated by the CCPA. Stifel may ask for additional information to properly understand, evaluate, and respond to the request.

Once the request is verified, Stifel attempts to fulfill it within 45 days (since the day of the request) or an extension as allowed by the CCPA. Some restrictions may apply to the fulfillment of the request.

Designating an authorized agent

A consumer willing to designate an authorized agent to make a CCPA request on the consumer’s behalf must provide the agent a written permission in a manner that complies with the applicable California law. The agent must arrange to submit to Stifel the proof of such permission by calling Stifel Client Services at (800) 679-5446. In some cases, Stifel may require that the consumer verifies his/her identity directly with Stifel.

For more information

<i>If you are a Stifel account-holder</i>	Please contact your Stifel advisor, representative, or branch.
<i>If you are a Stifel employee or contractor</i>	Please contact Stifel Human Resources.
<i>Others</i>	Please visit www.stifel.com/disclosures/privacy-notice .

Effective Date: January 1, 2020