

## American Century Investments (“ACI”) GDPR Website Privacy Notice

### Why are we providing this notice?

This Privacy Notice is intended to ensure that individuals outside our organisation with whom we interact, including visitors to our website, personnel of service providers or other suppliers and others who interact with us whether via our website or by corresponding with us by other means (e.g. by emailing or phoning us) (“**you**”, or “**your**”) are aware of the categories of your personal data ACI (“**we**”, “**us**” or “**our**”) may collect, how we collect it, what we use it for and with whom we share it.

“Personal data” means any information relating to you, such as your name and contact details, but does not include data where you can no longer be identified from it such as anonymised, aggregated data.

ACI will be a data controller in respect of personal data about you that is collected through this website or that you otherwise provide to us. A data controller is responsible for deciding the ways in which and purposes for which personal data about you is processed. We may process your personal data ourselves or through others acting as data processors on our behalf.

If you have any questions about this Privacy Notice you can contact us using the details set out in the ‘Contact Us’ section below.

We may provide supplemental privacy notices on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. These supplemental notices should be read together with this Privacy Notice.

### What information may we process about you?

#### If you contact us

If you contact us through our website or otherwise, you may provide personal data to us in the course of your correspondence with us. This may include, but is not necessarily limited to, your name, address, place of business, email address, other contact details, job title, correspondence records, your opinions and other information contained in the contents of your communications. We may also generate personal data about you in connection with the correspondence, such as correspondence records and opinions.

The purposes for which we may collect, store and use such personal data about you and our ‘lawful basis’ for processing such data are set out in the table below. The GDPR specifies certain ‘lawful bases’ for which we are allowed to use your personal data where that processing is subject to the GDPR.

<b>Purpose</b>	<b>Lawful basis for processing</b>
To correspond with you, respond to your enquiry or address matters raised by your correspondence.	Our legitimate interests in responding to or addressing your enquiry or otherwise communicating with you in the course of our business.

If you sign up to our newsletter through our website, you will be required to provide your email address.

The purposes for which we may collect, store and use such personal data about you and our ‘lawful basis’ for processing such data are set out in the table below.

<b>Purpose</b>	<b>Lawful basis for processing</b>
To undertake business development and marketing activities in relation to making suggestions and recommendations to you about products or services that may be of interest to you. This may include direct electronic marketing and alerts regarding items of interest.	Our legitimate interests in promoting our products and services and growing our business.

If you complete the account registration process and choose to access your investment information via our website, we may collect your website activity for auditing purposes. This may include account login history and file access records.

If you complete the certification form on our website, we may collect the following types of personal data: name, email address, user name and password.

The purposes for which we may collect, store and use such personal data about you and our ‘lawful basis’ for processing such data are set out in the table below.

<b>Purpose</b>	<b>Lawful basis for processing</b>
To abide by legal and regulatory obligations with respect to certain content contained within the website and for maintaining information security.	Our legitimate interests in limiting access to information to appropriate persons and enabling investors to access confidential information securely.

### Cookies

Our website uses cookies. These cookies collect information about how you use our website, your previous interactions with our website and other technical data (such as your IP address, browser type and version, time zone setting and location). Further information about the cookies we use and the purposes for which we use cookies is set out in our [Cookies Policy](#). Where cookies collect personal data, the lawful basis for our use of cookies and the information collected using cookies is our legitimate interests in:

- maintaining an operational website;
- learning about how users use and move to and around our website so that we can improve the way our website works and users’ experience on our website;
- learning about the numbers of users that use our website;
- providing users with a tailored and personalised experience when they visit our website; and
- identifying where a user has accepted applicable terms and conditions or disclaimers on our website.

Although, where cookies collect personal data, our lawful basis is the legitimate interests specified above, any cookies not strictly necessary for the operation of our website will only be set if you agree. ‘Strictly necessary’ cookies for which consent is not required are those cookies that are essential for the operation of our website and for us to provide services requested by you. They include, for example, cookies that enable you to log into secure areas of our website. Our website uses the following ‘strictly necessary’ cookies:

<b>Cookie</b>	<b>Expiry Period</b>	<b>Purpose</b>
OptanonAlertBox Closed	Persistent (1 yr)	Stores if the cookie alert box was just closed
OptanonConsent	Persistent (1 yr)	Stores cookie consent
sdsat_	Persistent (1 yr)	Used to support the use of Adobe Dynamic Tag manager
BIP	Session	Used to maintain an anonymous user session
BIPCQ	Session	Used to maintain an anonymous user session
JSESSIONID	Session	Used to maintain an anonymous user session
mbox	Persistent (1 yr)	Stores the country that was selected on the website

Persistent cookies remain on a user’s device for a time period as noted in the table above. Session cookies are automatically deleted when the user’s Internet browser is closed.

#### Other purposes

In addition to the uses above, we may also process your information where required by law to do so or if we reasonably believe that it is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

We may also process personal data for purposes other than those for which the personal data was originally collected (provided that such new purposes are not incompatible with the original purposes). Where this is the case, we will provide you with information about that further processing.

#### Special categories of personal data

There are more limited bases for processing ‘special category’ personal data. This is personal data which reveals or contains racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic data, biometric data, health data, sex life and sexual orientation.

We do not intend to actively collect special category data about you. Whilst we will use reasonable efforts to limit our holding of such data, please be aware that we may hold such data incidentally – for example, where you volunteer special category data to us, such as if you send us an email containing special category data.

#### What if you do not provide the personal data requested?

Unless and until you make a decision to engage in a business transaction with us (at which point we will send you a copy of any relevant privacy notice) you are not required to provide us with any information although please note that our website may automatically collect certain technical data (further details information in this respect is set out in our Cookies Policy). We may not be able to grant you access to certain parts of our website if you do not provide certain personal data.

#### **With whom will we share your information?**

We may share your personal data with a third party where this is required by law or where we have another legitimate interest in doing so.

We may need to share your personal data with:

- other entities within our group as part of our regular reporting activities in company performance, in the context of a business reorganisation or group restructuring exercise, or in connection with the operation of group-wide functions and services;
- professional advisers, including lawyers, bankers, auditors and insurers to the extent such information is relevant to their performance of their services;
- regulators and government bodies;
- IT service providers (such as cloud services providers, IT consultants and software-as-a-service providers); and
- any of our service providers where such information is relevant to their performance of such services.

We may share your personal data with third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with applicable law or judicial process or if we reasonably believe that disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, a court order or other legal process.

#### **Where your personal data may be processed.**

Certain of our advisors and service providers are based in the USA, UK and the EEA. The European Commission has not determined that the laws of the USA provide an adequate level of protection with respect to personal data.

Where required by the GDPR, we will (or will require a processor to) put in place appropriate safeguards such as the standard contractual clauses approved by the European Commission. If you require further information about this, you can request it using the details set out in the ‘Contact Us’ section below.

### **How long will we retain your information?**

We will retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements and our legitimate interests in maintaining such personal information in our records. In doing this we will have regard to the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. Generally, we will keep information relevant to our dealings with you for 7 years following the last date of activity.

In some circumstances your personal data may be anonymised so that it can no longer be associated with you, in which case it is no longer personal data.

Once we no longer require your personal data for the purposes for which it was collected, we will securely destroy your personal data in accordance with applicable laws and regulations.

### **Accuracy of information**

It is important that the personal data we hold about you is accurate and current. Please let us know if your personal data which we hold changes during your relationship with us.

### **Your rights in relation to your information**

Under certain circumstances, the GDPR or other applicable English, Guernsey or EU law gives you rights in relation to the information processed about you. These rights are to:

- request **access** to your personal data (commonly known as a ‘data subject access request’) and request certain information in relation to its processing;
- request **rectification** of your personal data;
- request the **erasure** of your personal data;
- request the **restriction** of processing of your personal data;
- **object** to the processing of your personal data;
- request the **transfer** of your personal data to another party.

If you want to exercise one of these rights, please use the contact details set out in the ‘Contact Us’ section below.

You also have the right to make a complaint at any time to a supervisory authority for data protection issues.

### Fees

You will not usually have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

### **Right to withdraw consent**

In the limited circumstances where we may require your consent to process your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us using the contact details listed below. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless we now have an alternative legal basis for doing so.

### **Changes to this privacy notice**

Our practices with respect to personal data may vary from time to time. We reserve the right to update this Privacy Notice at any time, and we will make an updated copy of such Privacy Notice available to you and notify you when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

### **Contact us**

This Privacy Notice was written with brevity and clarity in mind and is not an exhaustive account of all aspects of our collection and use of personal data. If you require any further information, please do not hesitate to contact us using the following contact details: Chief Privacy Officer, American Century Services, LLC, P.O. Box 410141, Kansas City, Missouri USA 64141 or by calling 1-800-345-2021 or 1-816-531-5575.