



**BROADRIDGE FINANCIAL SOLUTIONS, INC.
Global Privacy Policy**

Global Privacy Policy

This Global Privacy Policy (this “**Policy**”) specifies policy objectives for the collection, use, maintenance, security and disclosure of Personal Information by Broadridge Financial Solutions, Inc. and its Affiliates (collectively, “**Broadridge**”). This Global Privacy Policy and its related policies and procedures together constitute an integral part of Broadridge’s “**Global Privacy Program**”, which is intended to drive a consistent approach to privacy protection across Broadridge, and provide the basis for an effective Global Privacy Program. Definitions used in this Policy and other documents that are part of the Global Privacy Program are set forth in the [Privacy Policy Definitions](#).

Scope

Business Scope: This Policy applies to Broadridge and all Broadridge Workers.

Subject Matter Scope: This Policy sets forth certain principles that apply to all Processing of Personal Information by Broadridge globally. It is supplemented from time to time by related policies and procedures that state additional requirements for collecting Personal Information or Processing certain specific types of Personal Information, such as information:

- relating to Workers (See Global Human Resources Privacy Policy and its supplements);
- collected pursuant to client contracts (See Client Information Privacy Policy); and
- collected as a result of Broadridge’s marketing activities.

Applicable Regulatory Requirements and Local Laws: Where international, federal, state or local laws or regulations contain stricter requirements, Broadridge’s policy is to Process Personal Information in compliance with such stricter requirements. This Policy may be supplemented by other policies and procedures as required by, or appropriate in light of, such laws or regulations.

Policy Statement

All Processing of Personal Information of any type by Broadridge or on its behalf is to be handled in accordance with the privacy principles set forth in this Policy, and as required by applicable law or regulation. These principles apply regardless of whether Broadridge creates or generates Personal Information, or whether Personal Information is provided to Broadridge by Clients, Workers, job candidates or other third parties, and whether Broadridge is acting as a Data Processor or Controller. Specific requirements relating to Broadridge acting as a Data Processor or Controller can be found in related policies and procedures within the Broadridge Global Privacy Program.

Data Privacy Principles

The use of Personal Information by Broadridge, by Workers or service providers on its behalf must comply with the following principles:

Fairness, lawfulness and transparency. Personal Information is to be Processed fairly, lawfully, and in a transparent manner, and with the knowledge of the party providing such Personal Information, whether an individual or Client (except where applicable law provides otherwise). Broadridge will Process

Personal Information when it has a legal basis for doing so. Where applicable law requires, Broadridge will obtain individuals' prior consent to use their Personal Information. Broadridge strives to provide clear and easily accessible notices to individuals from whom Personal Information is collected directly, to inform them about how their Personal Information is handled. If Broadridge collects or receives Personal Information in its capacity as a service provider or Data Processor for Clients, the Clients will be responsible for determining the legal basis, providing notice and obtaining consent, and Broadridge will assist in providing notice and obtaining consent where requested.

Purpose limitation. Personal Information should only be collected for legitimate Business Purposes, as specified and made explicit in the notice provided to individuals or in a written contract with a Client. Personal Information should not be further disclosed, made available or otherwise used in a manner that is incompatible with those Business Purposes, except as specifically provided or required by applicable law. Whenever Personal Information is to be Transferred to or shared with a third party, whether or not a Broadridge Affiliate, reasonable steps should be taken to ensure that the receiving entity will handle the Personal Information within these limitations.

Data minimization and storage limitation. Broadridge seeks to limit the collection and use of Personal Information to what is necessary to achieve its legitimate, specified and explicit Business Purposes. Personal Information that Broadridge collects or uses should always be sufficient for and relevant to those Business Purposes, and obtained by lawful and fair means. Personal Information should be retained in a form that permits identification of individuals for no longer than is necessary to achieve the specified, explicit and legitimate Business Purposes for which it is collected.

Security, integrity and confidentiality. Broadridge aims to employ at all times administrative, technical and physical safeguards that are reasonably designed to maintain the confidentiality of Personal Information and protect, proportional to the sensitivity of the Personal Information being protected, Personal Information against loss and the unauthorized or unlawful access, use, modification, disclosure, damage or destruction of Personal Information, in accordance with applicable laws and regulations.

Individuals' choice and rights. Broadridge recognizes, in accordance with applicable law, individuals' rights with respect to their Personal Information, such as rights: (a) to obtain confirmation of whether or not Broadridge has Personal Information relating to an individual; (b) to receive a copy of its Personal Information; and (c) to have their Personal Information corrected, completed, amended or destroyed. Wherever appropriate under applicable law, Broadridge will allow individuals who provided Personal Information directly to Broadridge to exercise choice in relation to the collection, use, disclosure and destruction of their Personal Information. Broadridge employees can generally exercise their rights with respect to their Personal Information using HR Connect or by contacting their local human resources representative or the Broadridge Privacy Office. In many cases, employees can also update their Personal Information via Workday. Other individual rights, including with respect to former employees, are managed by their local HR Representative. If Broadridge collects or receives such Personal Information in its capacity as a service provider for Clients, Broadridge will assist Clients as needed to help them respond to such exercises of choice.

Adequate assistance. Broadridge aims to make readily available to Workers adequate assistance in establishing the existence and nature of Personal Information it collects or uses in any way, and the main purposes of its use.

Accountability. Broadridge will strive to be accountable for, and demonstrate compliance with, its policies, procedures and measures designed to give effect to the principles set out in this Global Privacy Policy, as well as requirements of applicable laws and regulations.

International Data Transfer Practices

Data protection and privacy laws may require Broadridge to implement steps to protect Personal Information that is transferred outside of the jurisdiction where it was collected. The steps required vary by jurisdiction.

Transfers to Broadridge Affiliates in the United States or third parties or suppliers outside the European Economic Area or the United Kingdom may be made pursuant to the European Commission-approved Standard Contractual Clauses or other legally acceptable mechanisms, such as the EU-U.S. Data Privacy Framework, the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework as set forth by the U.S. Department of Commerce (collectively, the “**Frameworks**”), that ensure an adequate level of protection. In all cases, Transfers will be made only if necessary for the purposes of the Processing. Where Worker Personal Information is Transferred to Broadridge in the United States, Broadridge relies on the Frameworks as further described in regional supplements to the Global Human Resources Privacy Policy.

Violations

Broadridge takes all allegations that this Policy has been violated seriously. Any Worker who receives a privacy complaint or becomes aware of a possible violation of this Policy should immediately report the complaint or concern to the local Privacy Officer, the Chief Privacy Officer, the Business Information Security Officer (“**BISO**”), his/her supervisor, human resources department manager or a member of the Legal Department. Broadridge will also carefully consider all allegations that Personal Information has not been protected appropriately, even if such allegations fall outside of scope of this Policy.

All Workers must immediately report any actual or suspected security incident related to Personal Information to the Broadridge Incident Response Team (See “**For More Information/Reporting**”). Broadridge investigates these incidents and takes those steps necessary to mitigate possible harm and comply with applicable laws.

Broadridge will work closely with its Clients regarding any allegation that this Policy has been violated regarding Client Personal Information or in the event of any security incident involving Client Personal Information.

Privacy Program Governance

The Global Privacy Program is intended to support compliance with this Policy and related policies and procedures, and with applicable laws or contractual agreements governing the handling of Personal Information. Broadridge has designated a Chief Privacy Officer, and appropriate privacy leaders who are responsible for overseeing implementation of the Global Privacy Program (“**Privacy Officers**”). The Chief Privacy Officer communicates Global Privacy Program expectations to these privacy officers and assists them as they implement the program locally. Please see Broadridge’s Privacy Governance Policy for more information on the individuals who support the Global Privacy Program.

Related Policies and Procedures

The Broadridge Global Privacy Program consists of this Global Privacy Policy and related privacy policies and procedures, including:

[Privacy Policy Definitions](#)

[Privacy Governance Policy](#)

[Client Information Privacy Policy](#)

[Global Human Resources Privacy Policy](#)

- [North America Human Resources Privacy Supplement](#)
- [European Economic Area/United Kingdom Human Resources Privacy Supplement](#)
- [AsiaPac Human Resources Privacy Supplement](#)

All Broadridge privacy policies constituting the Global Privacy Program and a list of the Privacy Officers can be found on [Privacy \(sharepoint.com\)](#).

More Information related to Broadridge's Global Privacy Program can also be found in Broadridge's Information Security Policy and its related policies, methodologies and standards.

For More Information/Reporting

For more information regarding the Global Privacy Program, please contact your local Privacy Officer or BISO, the Chief Privacy Officer, the Legal Department, Human Resources or the Information Security Group. To report a suspected or actual security incident, or a privacy complaint, please initiate such report on MyBroadridge at [Report an Incident or Concern](#), by contacting your local Privacy Officer or a member of the Broadridge Information Security Group at 631-254-7500 or SIRT@Broadridge.com.

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