# DATA PROTECTION & PRIVACY NOTICE

The data privacy regulations of some countries require that a person making a report containing personal data must be notified of certain collection and retention practices regarding the information submitted by that person and must accept the terms and conditions for the use of this service.

You are being asked to read and accept the terms contained below. If you do not wish to accept the terms below, we are unable to accept any information through the Speak Up Line and encourage you report this matter directly to your manager or to a representative of Global Human Resources, Legal, Conduct Risk Management Office, Compliance or Global Security.

## 1. General

The Speak Up Line is a web and phone-based intake system provided by State Street Corporation, One Congress Street, Boston, MA 02114 (“State Street”), to its employees, contingent workers, clients, vendors, suppliers and other business partners and those of its subsidiaries (“Reporters”) for reporting suspected violations of laws or regulations, or the State Street Standard of Conduct or other State Street policies.

The Speak Up Line and the database in which the personal data and information that you may report is stored, are operated by HR Acuity in the United States.

You may contact State Street with any questions relating to this Notice or the Speak Up Line as follows:

Privacy Notice – please contact the Privacy Office (privacyoffice@statestreet.com)

Speak Up Line – please contact the Conduct Office (conductstandardsreporting@statestreet.com).

To proceed further, you must read this notice in its entirety. If you agree, check the I CONSENT box that follows. You will then be able to submit a report or question using the Speak Up Line. If you do not provide your consent, you will not be able to submit a report or question through the Speak Up Line.

## 2. Use of the Speak Up Line

Use of the Speak Up Line is entirely voluntary. You are encouraged to report possible violations directly to your supervisor or manager, or to a representative of Global Human Resources, Legal, Conduct Risk Management Office, Compliance or Global

Security, depending on the nature of the possible violation. If you feel that you are unable to do so, you may use the Speak Up Line to make your report.

The Speak Up Line is a confidential online reporting system that allows you to report suspected violations of law or State Street policies, as well as other concerns you may have, to State Street. In certain countries, State Street may only accept reports through the Speak Up Line on limited topics, generally restricted to financial, accounting, auditing, bribery, competition law and, in certain countries, discrimination, bullying and harassment, safety and other workplace matters. If your concern pertains to a matter that, under local law, may not be accepted by State Street through the Speak Up Line, you will need to contact your supervisor or manager or a representative of Human Resources, Legal, Conduct Risk Management Office, Internal Audit or Global Security, to report your concern.

Please note that we are able to receive and process reports through the Speak Up Line only if you confirm that you have read and taken note of this Data Protection and Privacy Notice and expressly consent to the processing of the reports and your personal information as described below by clicking the I CONSENT box. If you do not consent then you may not use the Speak Up Line to file a report and should contact your supervisor or manager or a representative of Global Human Resources, Legal, Conduct Risk Management Office, Compliance or Global Security to report your concern.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that you believe is true. You will not be subject to retaliation from State Street for any report of a suspected violation that is made in good faith, even if it later turns out to be factually incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated. The information you submit will be treated confidentially except in cases where this is not possible because of legal requirements or in order to conduct an investigation, in which case the information will be handled sensitively. We encourage you to identify yourself in order for us to follow up with questions we may have.

## 3. What personal data and information is collected and processed?

The Speak Up Line captures the following personal data and information that you provide when you make a report: (i) your name and contact details (unless you report anonymously, where permitted by local laws) and whether you are employed by State Street; (ii) the name and other personal data of the persons you name in your report if you provide such information (e.g., a description of the person's function and contact details); and (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident. Note that depending upon the laws of the country in which you are residing, the report may not be made anonymously; however, your personal information will be treated confidentially and will only be disclosed as set out below.

## 4. How will the personal data and information be processed after your report and who may access personal data and information?

The personal data and information you provide will be stored in a database which is located on servers hosted and operated by HR Acuity in the United States. HR Acuity has entered into contractual commitments with State Street to secure the information you provide in accordance with applicable law. HR Acuity is committed to maintaining stringent privacy and security practices including those related to notice, choice, onward transfer, security, data integrity, access, and enforcement.

For the purpose of processing and investigating your report and subject to the provisions of local law, the personal data and information you provide may be accessed, processed and used by the relevant personnel of State Street, including Human Resources, Finance, Internal Audit, Legal, Conduct Risk Management Office, Corporate Compliance, management, external advisors (e.g., legal advisors), or, in limited circumstances, by technical staff at HR Acuity. Those individuals may be located in the United States or elsewhere.

Personal data and information you provide may also be disclosed to the police and/or other enforcement or regulatory authorities. The relevant bodies that receive and process personal data can be located in the US or in another country that may not provide the level of data protection available in the jurisdiction within which you reside.

The personal data you provide will be kept as long as necessary to meet our regulatory and legal obligations.

## 5. Accessing information concerning the report

State Street may notify any person who is the subject of a report to the Speak Up Line except where notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information.

Subject to applicable law and certain exceptions, individuals who are the subject of a report may access information relating to the report, excluding any information that could identify the reporter, and may exercise their privacy rights with respect to their personal data. Similarly, subject to applicable law and certain exceptions, reporters may access information relating to the report and exercise their privacy rights with respect to their personal data. To make any such requests, please contact the Privacy Office (privacyoffice@statestreet.com).

## 6. Special country regulations

Some countries restrict reports such that only employees in key or management functions may be the subject of a report. Any issues or concerns relating to topics not permitted by law to be reported via this service should be reported directly to your supervisor or manager or a representative of Human Resources, Legal, Conduct Risk Management Office, Internal Audit or Global Security as appropriate for the subject matter of the possible violation. In some countries, anonymous reports may not be permitted under the law except under extremely restrictive circumstances.