

Last Updated: April 24, 2023

This Privacy Notice may be amended or updated from time to time to reflect changes in our Personal Information processing activities, or changes in applicable law. When a change is made, we will post the updated version of this Privacy Notice to the Great Gray Trust Company website. All changes will become effective as of the Last Updated date above. We encourage you to regularly check the website to review any changes which we may make, and to review our Great Gray Trust Company Digital Privacy Notice , which covers our collection and use of information when you visit those websites.

Section 1: Categories of Personal Information Collected in the last 12 months

Category	Examples	Purpose
Access Data	Username, passwords, Personal Identification Number (PIN), tokens, other authentication information including security question response(s).	We collect this information to help us identify and authenticate you, for fraud prevention and similar purposes.
Account Data	Account Number	We collect this Personal Information to help us service your account.
Biometric Data	Signature	We collect this information for authentication purposes prior to disclosing any information about your account.
Communications Data	The contextualized information, in digital or physical form, involved in an exchange between one or more parties. Call logs, Call recording, Text or Email Messages	We collect communications data as needed to service your account and do business with you.

Contact Details	The information required to contact an individual or an organization, e.g., Address, Phone numbers, E-Mail address	We collect contact details as needed to identify you, contact you and do business with you.
Demographic Data	Gender, ethnicity, nationality, place of birth, marital status, residency status, military/veteran status	We collect demographic information as needed to identify you, contact you and do business with you.
Financial Information	Information for our financial review to service your account or from payments processing pertaining to executed transactions. For example, transaction date, transaction amount, product account transactions.	We collect financial information in order to provide you the financial products and services you request.
Geolocation Data	Physical locations or movements	We may collect geolocation data if you are located in California.
Government Issued Identification	Information used to identify and verify relevant institutions. Examples include Taxpayer Identification Number	We collect this information to help us identify and authenticate you, for fraud prevention and similar purposes.
Name	Individual's First, Middle and Last Name	We collect this Personal Information as needed to identify you, contact you, and do business with you.
Online / Digital Data	IP address, Web browsing history, Unique Device Identifier, Cookie data, Apps Downloaded or Used, geographic tracking information	We collect online and digital data to personalize our interactions with you and to administer and optimize our sites.
Sensitive Personal Data	Date of birth	We collect sensitive personal data during the onboarding process with the intention of developing a complete and accurate "Know

		Your Customer” (KYC) profile in line with regulatory requirements.
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We obtain the categories of Personal Information listed above from:

- you or your authorized agents directly at account opening;
- documents that you provide to us;
- third parties that interact with us in connection with the services we perform (e.g., credit bureaus);
- during account maintenance from you or your authorized agent on forms as required by law.
- We may also obtain your Personal Information from advertising networks, internet service providers, data analytics providers, government entities, operating systems and platforms, and social networks.

Failure to provide this information will prevent us from conducting business with you. This information may be combined with other personal data, including criminal convictions and offences, that we obtain from third party or publicly accessible sources for the purposes of compliance with a legal obligation.

We do not collect the following pieces of information on our consumers: commercial information (purchasing of consumer histories or tendencies); sensory data; education information; or inferences drawn from other Personal Information (personal preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes).

We retain your Personal Information for the life of your customer relationship with us. Once your customer relationship is terminated, we will continue to retain your Personal Information only for as long as it is needed for the purposes set forth in this Privacy Notice, and for no longer than the maximum time period allowable under applicable law and regulation.

Section 2: Disclosure of Personal Information

In accordance with applicable law, we may disclose your Personal Information to:

Affiliates which include our related companies by common ownership or control

Governmental and Judicial Bodies which include national and local government agencies, regulatory bodies, law enforcement agencies and courts

Third Parties which include service providers, auditors, attorneys, and other professional advisors. Third Parties are subject to contractual obligations to only process the Personal Information in accordance with our instruction, and to use measures to protect the confidentiality and security of your Personal Information.

Reasons we can share your Personal Information	Does Great Gray Trust Company share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes - information about your transactions and experiences	Yes	No
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We don't share

Note: Great Gray Trust Company does not sell your Personal Information, therefore any rights that may be afforded to you under CCPA related to the sale of your Personal Information do not apply.

Section 3: Your Legal Rights

Subject to applicable law, you may have the right to exercise the following:

- The right to request access to, or copies of, your Personal Information that we have collected, used, or disclosed for the previous 12 months.
- The right to request deletion of your Personal Information that we process

Household Requests - We currently do not collect household data. If multiple members of the household make a right to access or right to deletion request, we will respond as if the requests are individual requests.

To exercise rights under the CCPA, you must be a current resident of State of California. Only you, your authorized agent (a person or business entity registered with the California Secretary of State to conduct business in that state), or a person or entity to whom you have granted Power of Attorney to act on your behalf, may make a verifiable consumer request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

To exercise the access or deletion rights, please submit a consumer request to us:

- For customers of Great Gray Trust Company, contact your relationship manager, or call toll-free 1-866-427-6885.

We must verify your identity in order to process your request. We do this by verifying your name and address, so please include this information in your request. We may reach out for additional information to complete this process.

Please also include your email address if you wish to receive your response via email, as well as the nature of your request (access to or deletion of your data). We will acknowledge receipt of your request within ten days and will provide a response to your request within 45 days.

Authorized Agent

You may appoint an Authorized Agent to submit a request on your behalf. In order to do so, you must provide the appropriate documentation to Great Gray Trust Company (Power of Attorney or proof of filing with the Secretary of State). In order for your authorized agent to act on your behalf, they must supply the appropriate documentation and verify their identity at the time they place the request.

Please note there are instances in which Great Gray Trust Company is required to maintain, or otherwise is not required to delete, your Personal Information. For example, Great Gray Trust Company is not required to delete your information if it is being used:

- To complete a transaction or provide a good or service requested by you;
- To detect security incidents or protect against malicious, deceptive, fraudulent, or illegal activity;
- To enable solely internal uses based on your relationship with us, such as a Do Not Solicit request;
- To comply with a legal obligation, such as federal recordkeeping requirements; or
- Internally, in a lawful manner that is compatible with the context in which you provided the information.

California Non-Discrimination

California prohibits businesses from discriminating against you for exercising any rights under the CCPA, including, but not limited to, by:

- Denying you goods or services;
- Charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties;
- Providing you a different level or quality of goods or services; or
- Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

Consumer Rights Requests Metrics

Great Gray Trust Company have received zero (0) access, opt out, or deletion requests and has denied zero (0) requests as of April 24, 2023.

Section 4: Defined Terms

Personal Information	Any information that can be used to identify an individual, directly or indirectly. Personal Information does not include: <ul style="list-style-type: none">• publicly available information from government records;• deidentified or aggregated consumer information;• other information excluded from the CCPA's scope, such as:<ul style="list-style-type: none">○ health or medical information covered by the Health Insurance Portability and Accountability Act of 1996
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	<p>(HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data</p> <ul style="list-style-type: none"> ○ Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994
Processing	Operations, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, deletion or destruction
California Resident	An individual that resides in the State of California and whose personal income is taxed by the State of California
Verifiable Consumer Request	A request made by a consumer, on behalf of the consumer's minor child, or by a natural person or a person registered with the California Secretary of State as a consumer's authorized agent.

Questions about our Privacy Practices

If you have questions or concerns about our privacy notices or practices, please contact us at:

- For customers of Great Gray Trust Company, contact your relationship manager, or call toll-free 1-866-427-6885.