

What you need to know about doing business with RBC Clearing & Custody

This document contains information about your account(s) at RBC Clearing & Custody, a division of RBC Capital Markets, LLC (“RBC CM”).

Responsibilities of your brokerage firm and RBC Clearing & Custody

Your brokerage firm has entered into an agreement with RBC Clearing & Custody, a division of RBC Capital Markets, LLC (the “Clearing Firm”), for certain transaction processing, clearing, custodial, and financing functions with respect to your securities account. This agreement allocates certain responsibilities and the performance of various functions with respect to your account between your brokerage firm and the Clearing Firm. In general, all activities related to the recommendation of securities transactions, the entering of orders, and the supervision of your account, including determining the suitability of transactions in your account and ensuring recommendations made to you are in compliance with Reg Best Interest, are performed by your brokerage firm. The Clearing Firm does not have any supervisory authority or responsibility, under the agreement or otherwise, with respect to the activities of your brokerage firm.

Moreover, unless the Clearing Firm receives from you prior written notice to the contrary, it may accept from your brokerage firm as your agent, without any inquiry or investigation (a) all orders for the

purchase or sale of securities and other property in your account on margin or otherwise, and (b) any other instructions concerning your account or the property therein, including the transfer of funds to you or third parties. The following is a more detailed description of the responsibilities and functions allocated under the agreement.

Responsibilities of your brokerage firm

Your brokerage firm is exclusively responsible for:

1. Opening, approving, and monitoring your account, including obtaining, verifying, and retaining (a) information necessary to establish your account, (b) information relevant to the assessment of the suitability of transactions recommended to you (including your investment objectives and financial needs and resources), and (c) all other information and documentation with respect to your account that may be required by any applicable law, rule, or regulation.
2. Any and all securities transactions in your account, including (a) having reasonable grounds for believing that any recommended transaction is suitable and in compliance with Reg Best Interest on the basis of facts, if any, disclosed by you as to your investment objectives, other security holdings, and

financial situation, and (b) that any transactions entered for your account are made in compliance with all applicable laws, rules, and regulations.

3. Any investment advice given to you by your financial professional (broker) or any employees of your brokerage firm.
4. Accepting, recording, and executing transactions for your account or transmitting orders or instructions from you to the Clearing Firm for the execution of transactions for your account.
5. Obtaining and providing to the Clearing Firm all data necessary for the proper performance of any functions allocated to the Clearing Firm with respect to your account.
6. Investigating and responding to any inquiries or complaints you may have concerning your account and promptly providing written notice to the Clearing Firm of any complaint made with respect to the services provided by, or functions allocated to, the Clearing Firm.
7. Confirming that its employees comply with all applicable laws, rules, and regulations, including, without limitation, the furnishing of any required prospectus or other disclosure statements.
8. Establishing the commissions charged to you for all transactions executed for your account and making details of such charges available to you upon your request.

Investment and insurance products are not insured by the FDIC or any other federal government agency, are not deposits or other obligations of, or guaranteed by, a bank or any bank affiliate, and are subject to investment risks, including possible loss of the principal amount invested.

9. Complying with all applicable laws, rules, regulations and restrictions regarding receipt of securities or funds.

Responsibilities of the Clearing Firm

The Clearing Firm is responsible for:

1. Establishing and carrying an account for you based on information provided by your brokerage firm. Please note you may be responsible for certain fees and/or service charges related to the account carried by the Clearing Firm. Your brokerage firm can answer any questions concerning these fees.
2. Settling and clearing securities transactions in your account in accordance with your brokerage firm's instructions. Unless the Clearing Firm receives from you prior written notice to the contrary, the Clearing Firm relies on instructions and orders received from your brokerage firm, as your agent, as being authorized by you, suitable and in your best interest (if required by law). Furthermore, the Clearing Firm makes no independent inquiry as to your authorization, best interest or the suitability of any transaction in your account.
3. Executing securities transactions for your account if requested by and in accordance with instructions received from your brokerage firm. The Clearing Firm will not execute any order received directly from you. If your brokerage firm gives specific instructions with respect to the routing of your orders, the Clearing Firm will follow those instructions. If your brokerage firm does not give specific instructions with respect to the routing of your orders, the Clearing Firm may execute the order itself, execute the order with another brokerage firm that is a market maker, or execute the order through a primary or regional securities exchange.

4. Preparing and transmitting, or supplying your brokerage firm with the information necessary to prepare and transmit, confirmations of securities transactions for your account. Please note that your account may be subject to an annual fee if it is inactive. (Your brokerage firm can provide you with a definition of an inactive account.)
5. Preparing monthly or periodic statements of your account and transmitting such statements to you at the address provided by your brokerage firm or electronically, if you have so elected.
6. Preparing and maintaining such books and records as required for a broker-dealer performing the functions of a clearing broker pursuant to the agreement between your brokerage firm and the Clearing Firm and pursuant to all applicable laws, rules, and regulations.
7. Receiving, delivering, holding, and disbursing funds and securities for your account, including paying or collecting any interest or dividends and processing any exchange or tender offers, redemptions, conversions, and the exercise of any options or rights with respect to securities, in each case in accordance with instructions received from your brokerage firm. Please note that a fee may be charged for the delivery of physical certificates to you from your account.
8. Extending credit to you for the purchase or sale of securities in your account in accordance with the margin agreement between you and the Clearing Firm and in accordance with all applicable laws, rules, and regulations.
9. Safeguarding funds and securities in your account while such funds and securities are in the possession of the Clearing Firm.

10. Processing any instructions received regarding transfer of your account to another brokerage firm. Please note that fees may apply for such account transfer services.

Please note that you are directly responsible to the Clearing Firm, as carrying broker of your account, for the payment of all securities purchased in and the delivery of all securities sold for your account by or upon order of your brokerage firm.

We are pleased to provide these services to your brokerage firm with respect to your account. Please direct any questions you may have to your financial professional about the functions allocated between your brokerage firm and the Clearing Firm. If, however, you have questions concerning those areas for which the Clearing Firm is responsible that your financial professional cannot answer, please feel free to contact RBC Clearing & Custody at (612) 371-7830.

Extended hours trading risk disclosure

If your introducing broker-dealer offers pre- and post-market trading, please note the risks below.

Under extended hours trading, RBC CM clients may have the ability to trade stocks either before or after regular market hours, which are 9:30 a.m.–4 p.m. Eastern. This option provides our retail clients with greater opportunities to trade securities and manage their portfolios. Participating in extended hours trading entails several material risks, which may include the following:

Risk of lower liquidity

Liquidity refers to the ability of market participants to buy and sell securities. Generally, the more orders that are available in a market, the greater the liquidity. Liquidity is important because with greater liquidity it is easier for investors to buy or sell securities, and as a result, investors are more likely

to pay or receive a competitive price for securities purchased or sold. There may be lower liquidity in extended hours trading as compared to regular market hours. As a result, your order may only be partially executed, or not at all.

Risk of higher volatility

Volatility refers to the changes in price that securities undergo when trading. Generally, the higher the volatility of a security, the greater its price swings. There may be greater volatility in extended hours trading than in regular market hours. As a result, your order may only be partially executed, or not at all, or you may receive a price in extended hours trading that is inferior to the price you would receive during regular market hours.

Risk of changing prices

The prices of securities traded in extended hours trading may not reflect the prices either at the end of regular market hours, or upon the opening the next morning. As a result, you may receive a price in extended hours trading that is inferior to the price you would receive during regular market hours.

Risk of unlinked markets

Depending on the extended hours trading system or the time of day, the prices displayed on a particular extended hours trading system may not reflect the prices in other concurrently operating extended hours trading systems dealing in the same securities. Accordingly, you may receive a price in one extended hours trading system that is inferior to the price you would receive in another extended hours trading system.

Risk of news announcements

Normally, issuers make news announcements that may affect the price of their securities after regular market hours. Similarly, important financial information is

frequently announced outside of regular market hours. In extended hours trading, these announcements may occur during trading, and if combined with lower liquidity and higher volatility, may have an exaggerated and unsustainable effect on the price of a security.

Risk of wider spreads

The spread refers to the difference in price between what you can buy a security for and what you can sell it for. Lower liquidity and higher volatility in extended hours trading may result in wider than normal spreads for a particular security.

Risk of lack of calculation or dissemination of underlying index value or intraday indicative value

For certain derivative securities, an updated underlying index value or intraday indicative value may not be calculated or publicly disseminated in extended trading hours. Since the underlying index value and intraday indicative value are not calculated or widely disseminated during extended hours trading, an investor who is unable to calculate implied values for certain derivative securities in those trading sessions may be at a disadvantage to market professionals.

Statement of financial condition

RBC CM provides a report to customers semiannually on the firm's financial condition.

As a broker-dealer, RBC CM is subject to rules for maintaining sufficient net capital as set forth by three regulatory bodies: the U.S. Securities and Exchange Commission ("SEC"), the Financial Industry Regulatory Authority ("FINRA"), and the U.S. Commodity Futures Trading Commission ("CFTC"). The rules are designed to measure the general financial integrity and liquidity of a broker-dealer and define

the minimum net capital deemed necessary to meet the broker-dealer's continuing commitment to customers

- The SEC's Uniform Net Capital Rule, Rule 15c3-1 (the "Rule"), sets a minimum net capital requirement that is determined based on the type of activity a broker-dealer conducts. In RBC CM's case, the minimum net capital requirement is \$1.5 million. However, the Rule also requires that the minimum capital requirement be compared to additional capital requirement tests that can either be computed using the Rule's "Basic Method" or the "Alternative Method." RBC Clearing & Custody has elected to use the Alternative Method. Therefore, RBC CM's net capital requirement will be the greater of the result of the Alternative Method calculation or the minimum requirement of \$1.5 million.
- FINRA's net capital requirements may require a member organization to reduce its business if net capital is less than 4% of aggregate debit items. It may also prohibit a member firm from expanding its business and declaring cash dividends if its regulatory net capital is less than 5% of aggregate debit items.
- The CFTC's Regulation 1.17 requires that RBC CM maintain net capital equal to 8% of the total risk margin requirement for positions carried in customer accounts and 8% of the total risk margin requirement for positions carried in non-customer accounts, as defined.

Failure to maintain the required net capital may subject a firm to suspension or expulsion by the SEC, FINRA, and other regulatory bodies, and may ultimately require its liquidation.

RBC CM has at all times maintained its net capital above SEC, FINRA, and CFTC required levels. On April 30, 2021, RBC CM had net capital of \$3.160 billion, which was \$2.793 billion in excess of the required minimum net capital. Copies of

RBC CM's Statement of Financial Condition and footnotes as of April 30, 2021, may be obtained without charge by visiting our website at <https://www.rbcwealthmanagement.com/us/en/> or by contacting RBC CM toll-free at (800) 933-9946.

Tax matters

- RBC Clearing & Custody is not a tax advisor. All decisions regarding the tax implications of your accounts and any transactions or investments entered into in relation to such account(s) should be made in consultation with your independent tax advisor.
- During the term of this account, RBC Clearing & Custody may from time to time provide clients with information regarding account transactions that is subject to terms of confidentiality and/or non-disclosure. Notwithstanding, anything to the contrary set forth in such documentation or in any other agreement to which the parties hereto are parties, or by which they are bound, the obligations of confidentiality contained therein, as they relate to the transactions contemplated thereby, shall not apply to the tax structure or tax treatment of the transactions. Each party hereto (and any employee, representative, or agent of any party hereto) may disclose to any and all persons, without limitation of any kind, the tax treatment and tax structure of the transactions contemplated hereby, and all materials of any kind (including opinions or other tax analyses), that are provided to such party relating to such tax treatment and tax structure.

In case of errors or questions about your electronic transfer

If you discover errors or have questions about electronic transactions listed on your statement or receipt, please notify us at (800) 933-9946 or at the following address:

RBC Capital Markets, LLC
Client Support Services
60 South Sixth Street P12
Minneapolis, MN 55402

We must hear from you no later than 60 days after you receive the first statement on which the problem or error appeared. When contacting us, please have the following information available:

1. Your name and account number.
2. A description of the error or the transaction for which you have questions. Please clearly explain why you believe it is an error or why you need more information.
3. The dollar amount of the suspected error.

If you inform us verbally of the errors, we will require that you send us your dispute or question in writing within 10 business days. If we do not receive it within 10 business days, we may not credit your account. We will acknowledge receipt of your dispute within 10 business days after we hear from you and will promptly correct any error. If we need more time, we may take up to 45 days (90 days if the transfer involves a foreign institution) to investigate your dispute or question. If we decide to investigate, we will credit your account within 10 business days for the amount you think is in error. This will allow you access to the

money during the time it takes us to complete our investigation. If we decide there was no error, we will reverse the credit previously given and send you a written explanation within three business days after we finish our investigation. You may ask for copies of the documents that we used in our investigation.

Extreme market conditions disclosure

RBC CM endeavors to provide high levels of service to its clients even during events of extreme market conditions impacting trading of fixed income securities (e.g., a shortage of liquidity or divergent prices during periods of significant ratings changes, interest rate movements, or market-wide events). However, during such events, clients of RBC CM may experience interruptions in services and/or an increase in the average time required to execute a fixed income trade, including acceptance and execution of trade requests, pricing, price streaming, and/or market data dissemination. Also, obtaining fixed income securities prices that are fair, consistent, and reasonable may become more challenging during extreme market conditions.

Consistent with market practice, RBC CM may implement special order handling procedures to maintain a fair and orderly market and, thereby, protect both RBC CM and its clients from extraordinary market risk.

Please consult your financial professional should you have questions related to these types of events and their possible impact on fixed income trades.

Unrelated Business Taxable Income (UBTI) Filing Fee

Effective as of the 2022 filing season for reporting income for the 2021 calendar year, RBC CM will charge you \$250 for filing Form 990-T with the IRS in order to report UBTI generated in your retirement accounts held at RBC CM.

UBTI is typically generated by investing in partnerships that pass through earnings to the retirement account as a limited partner, most commonly publicly traded partnerships, master limited partnerships, private equity partnerships, hedge fund partnerships and limited liability companies. This UBTI is reported on Form 990-T by RBC CM as the custodian of the retirement account, and is generally required whenever the total UBTI generated in your retirement accounts exceeds \$1,000. Please contact your financial professional with any questions about whether your investments in a retirement account may be generating UBTI.

Customers Agreement

The Customers Agreement, Disclosure of Account Information section has been updated to include the following language.

Treatment of Personal Information, Proxy Materials and Issuer Communications for Foreign Securities

I acknowledge that, if my Account contains securities issued by a non-U.S. issuer, you are not obligated to distribute issuer communications to me unless you specifically agree to do so or if it is required by U.S. laws, rules, and regulations applicable to you. I consent to you sharing personal information about me to the extent it is required by applicable non-U.S. laws. Specifically, but without limitation, Directive (EU) 2017/828 and the related Commission Implementing Regulation (EU) 2018/36/EC and national laws implementing those requirements (together, “SRD II”)

allows a company with a registered office in the European Union (each, a “European Company”) which is admitted to trading on an European Union regulated market (each, an “EU Security”) to request certain information about me from you including my name, address, electronic mail address (if available), and my holdings of the EU Security issued by such European Company. I consent to you disclosing such information about me in response to such a request from the issuer of that EU Security, regardless of whether or not I meet the ownership threshold applicable under SRD II. In so responding, you may respond directly to the applicable European Company or to intermediaries through which you receive such requests, in accordance with SRD II. You may provide such information even if I object to you providing information about me to companies whose securities you hold for my Account under SEC Rule 14B-1(c), if I object to other disclosure or use of my personal information as described in the Privacy Notice, or if I’ve objected to any such disclosure under other applicable laws, rules, or regulations.

I acknowledge that I must enroll in electronic delivery of account notices and disclosures to receive notice of any voluntary corporate action, proxy, or other election available to me as a holder of EU Securities. If I do not enroll in electronic delivery, I nominate you to receive such material on my behalf and you are not obligated to provide notice to me that you have received such material. I nominate you to receive all confirmations in connection with the exercise of my rights as a holder of EU Securities in my Account on my behalf and I acknowledge that you will provide such confirmations to me upon my request.

For the avoidance of doubt, you will have no liability to me for actions taken, or not taken, by you or your agents in good faith with the intention of complying with applicable non-U.S. laws affecting the securities you hold

for my Account, including, but not limited to, any provision of SRD II.

Changes to RBC Insured Deposits Terms and Conditions

RBC CM is making important changes to the terms and conditions governing the RBC Insured Deposits Program (the “Program”).

The actual FDIC Coverage for your Deposit Accounts in the Program (the “Total Program Coverage”) may be less than the stated amounts due to the capacity or willingness of participating Program Banks to accept additional deposits. In such cases, the Total Program Coverage will be your Deposit Account balances eligible for FDIC insurance and any excess amounts will be treated as funds in excess of Total Program Coverage and invested as described in the existing terms and conditions. If additional FDIC coverage is later made available, RBC CM will attempt to rebalance the Deposit Accounts in order to reach the listed Total Program Coverage. Such rebalancing will include moving amounts out of the excess funds investment and into a Program Bank.

<h1>FACTS</h1>	WHAT DOES RBC CAPITAL MARKETS, LLC DO WITH YOUR PERSONAL INFORMATION?	
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.	
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ■ Social Security number and income ■ Assets and investment experience ■ Account balance and transaction history <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>	
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons RBC Capital Markets, LLC chooses to share; and whether you can limit this sharing.	
Reasons we can share your personal information	Does RBC Capital Markets, LLC 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	No	We don't share
For our affiliates' everyday business purposes — information about your transactions and experiences	Yes	No
For our affiliates to market to you	Yes	Yes
For our affiliates' everyday business purposes — information about your creditworthiness	No	We don't share
For our nonaffiliates to market to you	No	We don't share
To limit our sharing	<ul style="list-style-type: none"> ■ Call 1-844-937-2296 (toll-free) — our menu will prompt you through your choices(s). ■ Visit us online: https://secure.rbcwm-usa.com/optout. ■ Your choice to limit marketing offers from our affiliates will apply until you tell us to change your choice. You do not need to act again if you have already made a choice to limit marketing offers from our affiliates and have not told us to change your choice. <p>Please note: If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share information about you as described in this notice. However, you can contact us at any time to limit our sharing.</p>	
Questions?	Call 1-844-937-2296 (toll-free) or go to www.rbc.com/privacysecurity/ca/index.html .	



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Who we are	
Who is providing this notice?	RBC Capital Markets, LLC, which includes the divisions of RBC Wealth Management, RBC Clearing & Custody.
What we do	
How does RBC Capital Markets, LLC protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does RBC Capital Markets, LLC collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> ■ open an account or seek advice about your investments ■ buy or sell securities or make deposits/or withdrawals ■ enter into an investment advisory contract
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes—information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	We limit sharing by individuals, not accounts. Your choices will apply to you individually and to everyone with whom you hold an account jointly at the time you make your choices. You must tell us at or after the time you open or hold an account jointly with someone else if you wish to apply your choices to them.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include: <ul style="list-style-type: none"> ■ <i>Companies with an RBC name, such as Royal Bank of Canada; RBC Wealth Management; RBC Capital Markets, LLC; and RBC Bank (Georgia), N.A.</i> ■ <i>Companies with a City National name, such as City National Bank; City National Securities, Inc; and City National Rochdale, LLC.</i> ■ <i>Symphonic Financial Advisors, LLC; RIM Securities, LLC; Symphonic Securities, LLC; Datafaction, Inc.; Symphonic Insurance, LLC; LMCG Investments, LLC; Convergent Wealth Advisors, LLC; and Mid-Continent Capital, LLC.</i>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ■ <i>RBC Capital Markets, LLC does not share with nonaffiliates to market to you.</i>
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ■ <i>RBC Capital Markets, LLC does not jointly market.</i>
Other important information	
<p>RBC Capital Markets, LLC has entered into a Protocol for Broker Recruiting with certain other brokerage firms under which your RBC Capital Markets, LLC financial professional may take your personal information—specifically, your name, address, telephone number, email address, and account title—in the event your financial professional leaves RBC Capital Markets, LLC and joins one of the other member brokerage firms. If you are an RBC Wealth Management client and choose to limit this sharing, RBC Capital Markets, LLC will notify your financial professional of your decision to keep your personal information confidential and that you do not want your personal information shared by your financial professional with his/her new firm. To limit this sharing, call 1-844-937-2296 (toll-free) Monday – Friday, 8:00am – 4:30pm CT.</p> <p>While this privacy notice also describes the privacy practices of RBC Clearing & Custody, RBC Capital Markets, LLC carried by those firms to affiliates for their marketing purposes; therefore, holders of those accounts do not need to opt out.</p> <p>For Vermont Members/Customers: We will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures.</p> <p>Additional information concerning our privacy policies can be found at www.rbc.com/privacysecurity/ca/index.html or call 1-844-937-2296 (toll free).</p> <p>For California Residents: We will not share information we collect about you with nonaffiliated third parties, except as permitted by California law, such as to process your transactions or to maintain your account.</p>	

California Privacy Notice

This CALIFORNIA PRIVACY NOTICE supplements the information contained in the Privacy Statement of RBC Capital Markets, LLC (“we”, “us”, “our”) and applies solely to the rights of California residents with respect to “Personal Information” as defined in the California Consumer Privacy Act (“CCPA”). Any capitalized terms used in this policy have the same meaning as in the CCPA unless otherwise defined.

Personal Information We Collect

As used in this California Privacy Notice, “personal information” means any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include: (i) publicly available information from government records; (ii) de-identified or aggregated consumer information; or (iii) personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA) and the Gramm-Leach-Bliley Act (GLBA).

We have collected the following categories of personal information from consumers within the preceding twelve (12) months:

- A. Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.

Source—We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries or public records.

Business purpose for collection—We collect this data to market to clients and potential clients and service existing clients, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, preventing fraud, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services.

Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf. We also share this information with affiliates for marketing purposes, and with governmental entities.

- B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) such as name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.

Source—We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries or public records.

Business purpose for collection—We collect this data to market to clients and potential clients and service existing clients, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, preventing fraud, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services.

Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf. We also share this information with affiliates for marketing purposes, and with governmental entities.

- C. Protected classification characteristics under California or federal law such as age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

Source—We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries or public records.

Business purpose for collection—We collect this data to market to clients and potential clients and service existing clients, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, preventing fraud, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services.

Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf. We also share this information with affiliates for marketing purposes, and with governmental entities.

- D. Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Source—We collect this data from the consumer, the consumer’s transactions within an account, counterparties to these transactions, and from government agencies, registries or public records.

Business purpose for collection—We collect this data to comply with applicable law, market to clients and service clients, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, preventing fraud, processing payments, providing advertising or marketing services, or providing similar services.

Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf. We also share this information with affiliates for marketing purposes, and with governmental entities.

- E. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application, or advertisement.

Source—We collect this data from reviewing the consumer's electronic browsing history on our website.

Business purpose for collection—We collect this data to market to clients, provide advertising or marketing services, or similar services, and prevent fraud.

Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf.

- F. Geolocation data.

Source—We collect this data from reviewing the geolocation data revealed when a consumer accesses our website.

Business purpose for collection—We collect this data to market to clients, provide advertising or marketing services, or similar services, and prevent fraud.

Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf.

- G. Audio, electronic, visual, thermal, olfactory, or similar information.

Source—In compliance with any applicable notice requirements, we may record phone calls.

Business purpose for collection—We collect this data as may be required by law or to verify trade or other instructions given to us.

Parties with whom information was shared—We share this information with service providers so that they can store information on our behalf.

- H. Professional or employment-related information.

Source—We collect this data from the consumer.

Business purpose for collection—We collect this data to service existing clients, including maintaining or servicing accounts, providing advertising or marketing services, providing analytic services, or providing similar services.

Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf.

- I. Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).

Source—We collect this data from the consumer.

Business purpose for collection—We collect this data to service existing clients, including maintaining or servicing accounts, providing advertising or marketing services, providing analytic services, or providing similar services.

Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf.

- J. Inferences drawn from any of the above information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Source—We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries or public records.

Business purpose for collection—We collect this data to market to clients and potential clients, providing advertising or marketing services, providing analytic services, or providing similar services.

Parties with whom information was shared—We share this information with service providers so that they can process information on our behalf.

Personal Information We Sell

We do not sell personal information and have not sold consumer's personal information in the preceding twelve (12) months.

Consumer Rights under CCPA

The CCPA provides Consumers with certain rights regarding their Personal Information. If you are a Consumer (hereafter “you” or “your” refers to a Consumer), this notice describes your CCPA rights and explains how to exercise your rights.

Right to Access

You have the right to request, up to 2 times every 12 months, that we disclose to you the following:

The categories of personal information we have collected about you.

The categories of sources from which such personal information is collected.

The business or commercial purpose for collecting your personal information.

The categories of personal information about you disclosed for a business purpose during the last 12 months and the categories of third parties to whom such personal information was disclosed.

The specific pieces of personal information we have collected about you.

You have the right to request a portable copy of your Personal Information.

We will disclose the applicable information specified above to you upon receipt of your verifiable consumer request. See “**Submitting a Verifiable Consumer Request**” section below.

Right to Deletion

You have the right to request that we delete any personal information about you which we have collected from you, subject to certain exceptions allowed under applicable law.

Submitting a Verifiable Consumer Request—How to Exercise Rights of Disclosure or Deletion

We are required to provide the information specified above to you, or delete information in response to your request, only upon receipt of a verifiable consumer request. Your request must provide information to us that enables us to verify your identity (and, as applicable, of your authorized representative) in order for us to respond to your request. Upon receiving a request pursuant to this Policy, we will confirm receipt within 10 days and provide you with information about how we will verify and process the request. We will take reasonable steps to verify your identity (or the identity and authority of your authorized representative) prior to responding to your requests under CCPA. You agree to respond to reasonable requests by us for additional information to enable us to verify your identity in connection with your requests for information or deletion of information under the CCPA.

You may submit a verifiable consumer request after January 1, 2020 by

Contacting us by telephone at 1-844-937-2296 (toll free) between 8:00 a.m. and 4:30 p.m. Central Time

Completing a request form online:

RBC Wealth Management – U.S. clients visit <https://www.rbcwealthmanagement.com/us/en/legal/privacy-act>

RBC Clearing & Custody clients visit <https://www.rbcclearingandcustody.com/legal/privacy-act>

Once your request is verified, we will promptly take steps to disclose and deliver, free of charge to you, the personal information required by the CCPA. We will deliver the information to you by mail or electronically within 45 days of receipt of your request, or such additional time as may be permitted under the CCPA.

Right to Nondiscrimination

We will not discriminate against you because you elect to exercise any of your rights under the CCPA including, but not limited to:

Denying goods or services to you.

Charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties on you.

Providing a different level or quality of goods or services to you.

Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

None of the foregoing, however, prohibits us from charging you a different price or rate, or from providing a different level or quality of goods or services to you, if that difference is reasonably related to the value provided to us by your data.

Security of Personal Information

We seek to protect Personal Information by implementing and maintaining reasonable physical, electronic, and procedural security measures and safeguards designed to protect Personal Information within our organization. We provide employee training in the proper handling of Personal Information.

Updates

This California Privacy Notice was last updated on November 15, 2019. We may modify this California Privacy Notice at any time. For questions concerning our privacy policies and practices, you may contact us by telephone at 1-844-937-2296 (toll free) between 8:00 a.m. and 4:30 p.m. Central Time.

