

California Consumer Privacy Act (“CCPA”) Privacy Notice Addendum for California Residents

The California Consumer Privacy Act (“CCPA”) provides rights for California residents to receive information from Columbia Threadneedle Investments about the information we collect and use about you. This CCPA Privacy Notice addendum also provides information to California residents about what information you can obtain from Columbia Threadneedle Investments. Please click on the [Columbia Privacy Notices](#) link to learn more.

California Resident’s Right	Detailed Information	Use Purpose
<p>Right to Know What is Collected</p>	<p>Columbia Threadneedle may collect one or more of the types of information about you based on information you provided to us:</p> <ul style="list-style-type: none"> ■ Personal contact data (e.g., name, home address, home, work and cell phone number, email address, etc....) ■ Financial profile data (e.g., financial risk tolerance, financial goals, financial situation, such as amounts held in checking, savings and investment accounts we manage for you and that others manage for you, credit card debt, home value and mortgage balances, loan information, insurance information, your income and cash flow situation, account and social security numbers, etc....) ■ Personal profile data (e.g., age, marital status, how many children you have, employment status, a sample of your signature, hobbies, interests, etc....) ■ Commercial data (e.g., home value) ■ Biometric data (e.g., fingerprints, voice analysis, etc....) ■ Internet-related data (e.g., number of log-ins to web sites or software applications by reference to computer IP addresses we associate with you, etc....) ■ Location data (e.g., geographic locations associated with a computer’s IP address) ■ Professional data (e.g., current and former employers, occupations and work history, etc....) ■ Educational history data (e.g., education institutions attended, education levels attained, etc....) ■ Audio/Visual/Electronic data (e.g., your photo, a sample of your signature, etc....) ■ Consumer profile data (e.g., hobbies, interests, etc....) 	<p>Business and Commercial</p>
<p>Right to Request Information Regarding Personal Information Collected and Disclosed</p>	<p>At your request, Columbia Threadneedle will provide a report regarding the information we have collected, used, disclosed and/or sold to others in the prior 12 months about you which will cover:</p> <ol style="list-style-type: none"> 1. The categories of personal information collected about you; 2. The specific pieces of personal information we have about you; 3. Categories of sources from which personal information is collected; 4. Our purpose for collecting or sharing personal information; 5. Identification and categories of third-parties with whom Columbia Threadneedle shares your personal information. <p>Upon receipt of a Verified Request, Columbia Threadneedle will initiate the process of gathering such personal information to provide to you.</p> <p>Please see the section below entitled “Submission of a Verifiable Request” for instructions on how to submit a request to exercise any of your rights. Once the request is verified as described below, it will be considered a “Verified Request” for purposes of this notice.</p>	<p>Business and Commercial</p>
<p>Right to Request Deletion of Personal Information</p>	<p>You can request that Columbia Threadneedle delete personal information it has collected and maintains about you. In order to request that we delete such information, you need to follow the instructions provided below for submitting a Verifiable Request to delete your personal information. Upon receipt of a Verifiable Request, and so long as we have no right or obligation to keep your personal information despite your right to request deletion, Columbia Threadneedle is required by law to have you confirm your previously submitted Verifiable Request to delete your information. Once you provide that confirmation, we will start the process of deleting your personal information, and we will also instruct all of our service providers that maintain your personal information on our behalf to also delete your personal information from their records.</p>	<p>Business and Commercial</p>

California Resident's Right	Detailed Information	Use Purpose
Right to Know Columbia Threadneedle's Sale of Your Personal Information	Columbia Threadneedle does not sell personal information it collects from clients or prospects.	We don't sell
Right to Opt-Out of Sale of Personal Information	While Columbia Threadneedle does not sell our client's personal information to others, you have the right to direct businesses that do sell your personal information to stop selling your personal information and to refrain from doing so in the future.	We don't sell
Right to Non-Discrimination	Columbia Threadneedle shall not discriminate against you by altering the price of any of its products or services because you chose to exercise any of your rights under the CCPA.	N/A

Definitions. For purposes of this CCPA Privacy Notice addendum, the terms below have the following meaning:

Business purpose means “the use of personal information for the business’s or a service provider’s operational purposes, or other notified purposes, provided that the use of personal information shall be reasonably necessary and proportionate to achieve the operational purpose for which the personal information was collected or processed or for another operational purpose that is compatible with the context in which the personal information was collected.”

Commercial purpose means “to advance a commercial or economic interest, such as by inducing another person to buy, rent, lease, join, subscribe to, provide, or exchange products, goods, property, information, or services, or enabling or effecting, directly or indirectly, a commercial transaction,” explicitly excluding engaging in protected free speech.

Verified Request (or Verifiable Request) means a request that is made by a California resident on their own behalf, or on behalf of a California resident from whom they have received authorization, and that Columbia Threadneedle can verify pursuant to its standard verification procedures. For your protection, we request and verify specific pieces of information about you prior to sharing to any data with you.

Exceptions to Our Obligation to Provide or Delete Information. You should be aware that Columbia Threadneedle’s obligations to you are subject to certain important exemptions that will limit the things we are required to provide to or do for you under this law. Specifically, the CCPA does not apply to personal information collected pursuant to Gramm-Leach-Bliley Act (GLBA), such as transaction, experience and health information that falls within the definitions of Personal Health Information (PHI) under the Health Insurance Portability and Accountability Act (otherwise known as “HIPAA”). This means that even if you submit a Verifiable Request, Columbia Threadneedle is not required to provide information to you or delete your information if your information is required by us to provide any of the financial products and services we provide to consumers or clients. This will likely limit the amount of information you receive in response to a Verifiable Request under the CCPA. In addition, Columbia Threadneedle is not obligated to delete information in response to a Verifiable Request if other regulations require us to maintain these records for a period of time. In many instances that will be the case.

Submission of a Verifiable Request. You may submit a Verifiable Request by calling 1.800.862.7919 and providing all of the information below. You may also send your Verifiable Request by electronic mail to [Privacy Consumer Inquiry](#). Each Verifiable Request, no matter how submitted, must include all of the following information:

- First and Last Name
- Mailing address (street, city, state, zip code)
- Email address
- Phone number
- Client or Account ID (if a Columbia Threadneedle client)

Upon receipt of your request, Columbia Threadneedle must ensure it is a Verifiable Request. Columbia Threadneedle will acknowledge our receipt of your request within ten (10) days, and we have forty-five (45) days to respond to you or request that you confirm your request to delete information we hold. If reasonably necessary to respond to your Verifiable Request, Columbia Threadneedle may extend the deadline for our response to you by an additional forty-five (45) days, and if we choose to do so, we will notify you.