

California Privacy Rights Act (CPRA) Privacy Notice Addendum for California Residents

The California Privacy Rights Act (“CPRA”) provides rights for California residents to understand our data collection practices and to receive information from Columbia Threadneedle Investments about the information we collect and use about you. This CPRA 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
Right to Know What is Collected	<p>Columbia Threadneedle Investments (“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.) ■ 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) ■ Internet-related data (e.g., number of logins to web sites or software applications by reference to computer IP addresses we associate with you, etc.) ■ 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.) 	Servicing client accounts, required reporting, and marketing
Right to Know Sensitive Personal Data Collected	<p>Columbia Threadneedle may collect one or more types of sensitive personal data about you based on the information you provided to us:</p> <ul style="list-style-type: none"> ■ 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.) ■ Biometric data (e.g., fingerprints, voice analysis, etc.) ■ Location data (e.g., geographic locations associated with a computer’s IP address) 	Servicing client accounts, required reporting, and marketing
Right to Request Information Regarding Personal Information Collected and Disclosed	<p>At your request, Columbia Threadneedle will provide a report regarding the information we have collected, used, disclosed 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>	Honoring Right to Access

California Resident's Right	Detailed Information	Use Purpose
Right to Request Deletion of Personal Information	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. Upon receipt of a Verifiable Request, and so long as we have no right or obligation to keep your personal information, 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.	Honoring Right to Deletion
Right to Correct Inaccurate Information	You can request that Columbia Threadneedle correct inaccuracies to personal information it has collected and maintains about you. To request that we correct such information, you need to follow the instructions provided. Upon receipt of a Verifiable Request, and so long as we have no right or obligation to maintain the disputed information despite your right to request correction, Columbia Threadneedle is required by law to have you confirm your previously submitted Verifiable Request to correct your information. Once you provide that confirmation, we will start the process of correcting your personal information, and we will also instruct all of our service providers that maintain your personal information on our behalf to also correct your personal information in their records.	Honoring Right to Correction
Right to Know Columbia Threadneedle's Sale of Your Personal Information	Columbia Threadneedle does not sell or share for cross-contextual behavioral advertising personal information it collects from clients or prospects.	We don't sell or share
Right to Opt-Out of Inferring Characteristics from Sensitive Personal Data	Columbia Threadneedle does not use Sensitive Personal Information to infer characteristics about clients or prospects.	We don't infer characteristics from Sensitive Personal Data
Right to Limit Automated Processing	Ameriprise does not use computer-led or Automated Processing to make determinations or infer performance of any clients or other individuals.	We do not use automated processing
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 CPRA.	N/A

Definitions. For purposes of this CPRA Privacy Notice addendum, the terms below have the following meaning: *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 any data with you.

Sensitive Personal Information (sensitive personal data) means personal information that reveals a consumers social security, driver's license, state ID card, or passport number; account login, financial account, debit card or credit card number combined with any security or access code, password or credentials allowing access to an account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs or union membership; contents of mail, email, and text messages; genetic data, including biometric information for identification purposes; and health, sex life or sexual orientation.

Sensitive personal information collected must not be incompatible with the disclosed purpose of which the sensitive personal information was collected. We do not infer characteristics from sensitive personal data.

Use of personal information. The use of personal information for the business's or a service provider's service to your accounts and applications for products and services. Your financial information will be used by the company to provide you better service, address your questions and needs, and for uses you specifically request us to perform, such as applications for products.

Contact details will be used to contact you about your applications, accounts, or provision of services. Further, information on your financial history and applications will be processed, without automated means, for the business purpose of assessing your suitability for the products and financial needs. Finally, there is a business purpose to use your personal information, in some cases, to comply with regulations binding on our company and practices.

Data collected from the use of our website, such as IP address, location, and browsing history, will be used to improve your experience and comply with your requests through our website. View our website [Internet Privacy Statement](#) for more details.

With whom will we share your personal information? We may share your information with other companies within Columbia Management, our affiliates, and parent company, Ameriprise Financial, Inc. We may also share your information with service providers that Columbia Management employs to service the account, perform a necessary function to fulfill your requests, or otherwise assist in our services to you. The sharing of your data in this way is for the business purpose of servicing your account.

We also share data with service providers to assist the firm with data analytics to understand the value to our customer base of our products and services. Further, we may share your data with service providers to assist with our marketing campaigns and to provide you with our products that you may wish to receive. Your receipt of marketing email communications can be limited through the preference center on our website if you wish. Finally, we may also share your data with third parties if needed and appropriate to comply with our legal obligations, defend our legal rights, protect your vital interests in the event of an emergency, or if we have otherwise obtained your consent.

Reasonable Security Procedures and Practices.

We will maintain the data in a manner commensurate with the data held with regard to the sensitivity. Access to the data will be reserved for those with a business need for the Information. The data will be kept in an encrypted manner and any transfer or disclosure will be done in a secure manner.

Retention Criteria.

Data we collect on our clients and prospective clients is held for 7 years after you are no longer a client or our last contact 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 CPRA 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 CPRA. 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 correct or 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.