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Our privacy commitment to you

- Protect client information
- Explain how we use client information
- Offer choices on the use of client information and honour our choices
- Collect, use and process client information respectfully and lawfully

This document includes information about how Bank of America Corporation manages client information and what actions you can take

- Information collection
- Information use
- Information sharing
- Honouring our choices
- Data security and retention
- Other privacy commitments
- Privacy Notice updates

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We may provide other materials regarding the collection, use, disclosure and processing of client information described in account documents on websites or as required under local laws. Note: If there is a conflict between this Privacy Notice and the account documents, the terms of the specific account documents will prevail.

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We collect, use and process various types of client information about you and your accounts to the extent appropriate for our relationship with us. The client information that we collect about you may include, but is not limited to, the following:

- personally identifiable information information that identifies you or can be used to identify you such as name, address, email address, telephone number and personal identifiers such as National Identifier or number
- application information information you provide to us on applications including assets, income and debt
- account information information such as your credit card, ATM or cheque card number, investment account, bank account, loan or other numbers, user ID and password, security questions and codes such as mother's maiden name
- transaction and experience information information about transactions and account activity such as account balances, payment history and account usage as well as information about our communications with you including your enquiries and our responses
- consumer report information information from a consumer report including credit score and credit history
- information from outside sources information from outside sources other than consumer report information such as information regarding employment, employer, occupation, place of work, credit and other relationships including employment history, loan balances, credit card balances, property insurance coverage, data from public records and other verifications by authorised persons or any information you elect to provide

As required by applicable anti-corruption, anti-bribery, anti-terrorism, anti-money laundering and other laws, we also collect information to verify your identification.

If you provide us with information about third parties, including relatives, beneficiaries and guardians, you agree to inform such third parties and obtain their consent to the processing of that information in accordance with this Privacy Notice and any other applicable laws and regulations.

Bank of America Corporation companies including our bank broker dealer credit card and mortgage affiliates and branches around the world may collect use and process client information for several purposes For example

- to provide you with products and services
- to facilitate transactions
- to provide you with advice and guidance
- to allow you to apply for products prequalify for a mortgage apply for a credit card or other financial products and evaluate your eligibility for such a product
- to service maintain or collect on accounts
- to respond to client requests
- to detect prevent and investigate fraud
- to provide security for our clients employees and the general public
- to verify your identity or the identity of our representative or agent
- to record transactions in public records such as mortgages
- to perform risk management including credit risk analysis
- to perform insurance functions
- to comply with applicable laws rules and regulations including anti terrorism anti money laundering and tax reporting rules and regulations
- to comply with legal processes to respond to requests from public regulator or government authorities including authorities outside of

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Bank of America Corporation companies around the world may also share client information with other third parties. These third parties may include public regulator and government authorities, credit reporting agencies, intermediaries such as SWIFT, a global provider of secure financial messaging services, other non-affiliated third parties as requested by you or our authorised representative, self-regulator organisations or judicial or law enforcement authorities. For example:

- to detect, prevent and investigate fraud
- to provide security for our clients, employees and the general public
- to record transactions in public records such as mortgages
- to allow credit checks
- to manage risk management including credit risk analysis
- to provide credit references when requested by you
- to track debtors
- as part of the sale, merger or similar change of a Bank of America Corporation business
- to comply with applicable laws, rules and regulations including anti-terrorism, anti-money laundering and tax reporting rules and regulations
- to comply with legal processes, to respond to requests from public regulator or government authorities including authorities outside our country of residence and to allow us to pursue remedies and limit damages

Additionally, where you have a contractual relationship with a third party in connection with a product or service such as through an outside investment manager or insurance provider, we may share information in accordance with that relationship and the handling of information by that party will be subject to our agreement with that party. If you have a relationship with us through our employer such as through our stock option or retirement plan, then we will share plan information with our employer and handle such information in accordance with plan agreements.

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You have the right to request a copy of our client information and request that such client information be amended, corrected or deleted if inaccurate or incomplete except in limited circumstances. In certain circumstances, you also have the right to oppose for legitimate purposes the collection or processing of our client information.

Additional information regarding our choices about how our client information is processed and used may be found in our account documentation. If you have any questions regarding our choices that are not addressed in our account documentation or in this Privacy Notice, please contact us at [redacted] or the appropriate local number or address from our statement or account materials.

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Keeping client information secure is one of our most important responsibilities. We maintain physical, technical, electronic and procedural, organisational safeguards and security measures to protect client information against accidental, unlawful or unauthorised destruction, loss, alteration, disclosure or access, whether it is processed by us in our local jurisdiction, the United States or elsewhere. Appropriate employees are authorised to access customer information for legitimate and specified business purposes. Our employees are bound by a code of ethics and other internal policies that require confidential treatment of client information and are subject to disciplinary action if they fail to follow such requirements.

We process client information in a manner that is adequate, relevant and not excessive in relation to the purposes for which it is collected or further processed. We endeavour to keep client information for only so long as is necessary for the purposes for which it was collected, to meet legal and regulator requirements and in keeping with the period required or permitted by law.

You can also make sure that our information is accurate by reviewing our account information for example on a statement or in response to specific requests, telling us if it is incorrect by calling or writing to us at the telephone number or appropriate address for such changes on our statement or other account materials.

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When you communicate with Bank of America Corporation companies, your telephone conversations and electronic communications, including emails, text messages and instant messages, may be monitored or recorded to the extent permitted by applicable law. For information on our online privacy practices, including the use of cookies, please see the online notices located on our website.

In some jurisdictions, Bank of America Corporation may owe you a duty of confidentiality under statute and common law in relation to your client information. Those duties are qualified by your understanding and acceptance of the terms set out within this Privacy Notice. We will share and use client information in accordance with this Privacy Notice or as explained in our other account opening documentation, as permitted by local law or as otherwise agreed upon between us. Please note if you choose to withhold or limit our ability to share client information, we may not be able to provide you with certain information, offers or services.

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We may make changes to this Privacy Notice at any time and will inform you as required by applicable law. To receive the most up-to-date Privacy Notice, you can visit our website at ml.com/privac or contact your financial advisor.