BANK OF AMERICA

Global Supplemental Privacy Notice

LAST UPDATED: October 2025

Introduction

This Global Supplemental Privacy Notice ("Notice") provides an overview of how Bank of America Corporation and all banking and non-banking U.S. affiliates or subsidiaries ("we" or "our" or "us") collect, use or disclose Personal Information (as defined below) including information about our current and former customers and clients ("you" or "your"). This Notice explains our data collection policies when we engage in the processing activities, described in Processing Activities section below, to provide financial services ("Services").

Protecting your Personal Information is a top priority. Consistent with our obligations under applicable laws and regulations, we have internal procedures and policies in place to maintain physical, technical, electronic, procedural, and organizational safeguards and security measures that are designed to protect Personal Information against accidental, unlawful, or unauthorized destruction, loss, alteration, disclosure, or access, whether it is processed by us or elsewhere.

Consumers in the U.S. who seek, apply for, or obtain our financial products and services for personal, family, or household purposes should also refer to our U.S. Consumer Privacy Notice. In the event of a conflict between this Notice and our U.S. Consumer Privacy Notice, when applicable, the U.S. Consumer Privacy Notice shall govern. California residents may have additional rights and are encouraged to review our California Consumer Privacy Notice for additional information.

Updates to this Notice

This Notice is subject to change and is updated periodically to comply with applicable laws and regulations. The "LAST UPDATED" date at the top of this Notice indicates when this Notice was last revised. Changes are effective when we publish the revised Notice.

Personal Information We Collect

"Personal Information" is information that identifies an individual or relates to an identifiable individual. The table below contains a list of the Personal Information we may collect from you or through your interaction with the Services. Failure to provide the requested information, may prevent us from providing the requested Services. In the table under Processing Activities, we have associated the categories of Personal Information we collect with the categories of our processing activities/processing.

Categories of Personal Information	Types of Information
Account Activity	Transactional activity from an individual's personal or business accounts (e.g., credit card, checking account, etc.), such as: account activity, transaction details, loan number, internal identifier
Associated Characteristics	An individual's characteristics such as age or gender
Compensation Information	Information pertaining to employment status and income sources, such as: employer name, business address, business phone number, business email address, salary, or other source of income
Contact Data	An individual's contact information, such as: name, alias, company, physical and mailing address, phone number, email address, including business contact information
Event Data	Confirmation of an individual's attendance at in-person or virtual event. Information gathered to enable attendance or to offer special accommodations, such as: event registration, check-in, dietary requests, travel, surveys, and other similar identifiers. (Note: religion, disability and health concerns may be inferred from a person's requests.)

Categories of Personal Information	Types of Information
Identifiers	Information that can identify a person such as name, Social Security Number (SSN) or Information containing an individual's country-specific national identifier, driver's license, passport or visa number or other similar identifiers
Images/Videos/ Audio — People	Video of clients (ATMs, Financial Centers), audio of clients (Contact Center, Financial Center outbound calls), such as: photographs, video or audio recordings of individuals and/or groups
Legal Transactions	Information from judiciary bodies regarding legal matters pertaining to an individual, such as: legal documents and/or decisions
Online Authentication Information	Information required to access an individual's personal account, online or through mobile applications, such as: User Identification (ID), PIN/Password, Internet Protocol (IP) address, challenge questions, device ID, mobile phone number, biometric information
Online Behavior	An individual's purchasing, browsing and consuming history and inferences drawn to determine the individual's tendencies online, such as: purchasing, browsing, search, internet interactions (site, application and/or advertisement) history behavior
Online Identifier	A means of identifying an individual by associating informational traces an individual leaves when operating online, such as: cookies, pixel tags, web beacons, locally stored objects, unique device identifiers (for example, Media Access Control (MAC) and Internet Protocol (IP) addresses, smart device information, mobile phone network information
Payroll Data	Payroll information including direct deposit bank details, payroll deductions and tax details, such as: Direct deposit bank details, payroll deductions, tax details
Personal Assets/ Liabilities	Information regarding household expenses, income, asset ownership and/or debt information, such as: household expenses, source/frequency of funds, source/frequency of income, investments, other expenses, financial plan
Personal Data — Minors	Personal Information pertaining to an individual under 18 years of age such as: name, account information, relationships to other account holders, event registration information, which may include special accommodations and dietary restrictions
Preferences	Such as language, interests, and other feedback/preferences that you might express during your use of our Services
Proof of Address	Information found on utility bills and/or financial statements
Sensitive Personal Information	Information about an individual's religious, ideological, political or trade union–related views or activities, health, racial or ethnic origin, Social Security measures and administrative or criminal proceedings and sanctions, such as: race, ethnicity, religion, disability information, criminal records, political or philosophical belief
Signature	Any symbol, character, sound or mark made by an individual with the intent to authenticate or authorize a transaction, agreement, or written or electronic document, such as: electronic signature, digital signature (e.g., DocuSign), web signature, copy of written signature, ink/wet signature

In addition, we may collect Personal Information from other sources, including:

- Third-Party Logins: When you connect or login to our Services through a third-party service, you direct the service to send us information as controlled by that service or as authorized by you via your privacy settings on that service.

- Client-related Persons: We may collect information from persons or institutions representing you. Where you are accessing our Services because of a relationship with a corporate or institutional client ("Corporate Client"), we also may collect information from the Corporate Client (e.g., where you are an employee or board member).

- Other Third Parties: We may collect information from sources such as publicly available databases, marketing partners, third-party providers and data brokers.

If you are sharing information on behalf of another individual, please provide them with a copy of this Notice. When you provide us with Personal Information about members of their family, dependents or friends (e.g., individuals provided by a customer as a guarantor), it is your responsibility to inform such individuals and obtain agreement that their data can be shared with us. Should the individual have any questions, please refer them to the Contact Us section in this Notice. By disclosing Personal Information about others to us in connection with our Services, you represent that you have the authority to do so and permit us to use the information in accordance with this Notice.

Processing Activities

We need to collect and process Personal Information to provide the requested Services, or because we are legally required to do so. The table below is a summary of our activities which may require the processing of your Personal Information.

Purpose	Reasons for Processing	Categories of Personal Information
Account Opening and Management	• To obtain all enterprise and regulatory requirements for the opening, expansion of services and account maintenance, which may include identity verification requirements • To meet all regulatory requirements to obtain the necessary information to open accounts to enable your trading or other activities	Account Activity, Associated Characteristics, Compensation Information, Contact Data, Identifiers, Images/Videos/Audio — People, Personal Assets/Liabilities, Personal Data — Minors, Proof of Address, Signature
Aggregation / Anonymization	Aggregating and/or anonymizing Personal Information so that it will no longer be considered Personal Information	Personal Information as relevant for the specific business purpose
Analytics and Modeling	To provide modeling and analytical insights about our consumers	Account Activity, Associated Characteristics, Compensation Information, Contact Data, Identifiers, Online Activity, Sensitive Personal Information
Client Communications and Relationship Management	To directly communicate with you to help improve the Services we provide or in relation to a Service complaint	Associated Characteristics, Contact Data, Identifiers, or other categories as relevant for the specific communication about our Services
Consumer and Wealth Services	To provide overall support in connection with existing or former accounts, including Trust Services that may involve account transition and termination	Associated Characteristics, Contact Data, Identifiers, Legal Transactions, Online Authentication Information, Online Behavior, Online Identifier, Personal Data — Minors, Sensitive Personal Information

Purpose	Reasons for Processing	Categories of Personal Information
Corporate Client Services	To provide Corporate Client Services, including corporate credit cards and benefit programs	Account Activity, Associated Characteristics, Contact Data, Identifiers, Legal Transactions, Online Authentication Information, Online Behavior, Online Identifier, Sensitive Personal Information
Electronic Communications/ Digital Services	• To facilitate sending internal digital messages • To enable your experience and interactions through our mobile application or online banking • To enable a customer to send their account information, with consent and by request, to a third-party application (e.g., Venmo, Mint)	Account Activity, Associated Characteristics, Contact Data, Identifiers, Images/Videos/ Audio — People, Online Authentication Information, Online Behavior, Online Identifier
Emergency and Incident Response	Ensuring the safety of on-site personnel and visitors; responding to, handling, and documenting on-site accidents and medical and other emergencies; actively monitoring properties to ensure adequate incident prevention, response, and documentation (including CCTV); requesting assistance from emergency services; and sending notifications and alerts in the event of incidents or emergencies (such as via SMS, email, call, audio visual device prompts, etc.)	Personal Information as relevant for the specific legal action, regulatory investigation, and/or legal processes in question
Events Management	To support event management and execution	Associated Characteristics, Contact Data, Event Data, Identifiers, Images/Videos/ Audio — People, Personal Data — Minors, Sensitive Personal Information
Legal, Regulatory and Compliance	• To fulfill our legal and compliance-related obligations • To comply with applicable laws and regulations (including any legal or regulatory guidance, codes, or opinions), sanctions and non-financial regulatory reporting requirements • To comply with applicable Anti-Money Laundering (AML)/ Know-Your-Customer (KYC) laws and regulations, including identifying beneficial owners, conducting background checks, monitoring, and performing other checks to meet anti-terrorism financing legal requirements. As required by applicable laws, this may involve processing your political affiliations, criminal convictions, or allegations of offenses	Account Activity, Associated Characteristics, Contact Data, Identifiers, Personal Information including Personal Information as relevant for each specific regulatory and compliance obligation, Proof of Address, Sensitive Signature
Marketing / Communications	Sending you newsletters, event invitations, and mailings (digital and non-digital) that we think may be of interest to you; providing and fulfilling event registration and service requests	Associated Characteristics, Contact Data, Event Data, Identifiers

Purpose	Reasons for Processing	Categories of Personal Information
Monetary Transactions	To enable the movement of money in/out of your account	Associated Characteristics, Contact Data, Identifiers
Operations and General Business	Administering online Services (including troubleshooting and diagnostic testing, conducting performance analyses of our systems and Services, testing new system features to evaluate their impact, system and log maintenance, technical support, system debugging, and hosting data); and facilitating mergers, acquisitions, and other reorganizations and restructurings of our business (including prospective transactions)	Personal Information as relevant for the specific business operations
Personalizing our Services	Personalizing our interactions with you and providing you with information and/or offers we believe will be relevant and interesting to you	Associated Characteristics, Contact Data, Event Data, Identifiers, Online Behavior, Preferences
Risk Analysis	To manage our internal risk and analyzing our client portfolio	Account Activity, Associated Characteristics, Compensation Information, Contact Data, Event Data, Identifiers, Online Behavior, Personal Assets/ Liabilities, Sensitive Personal Information
Specialized Services	• To facilitate referrals to specialists • To support payroll activities or other services requested by the client	Associated Characteristics, Contact Data, Identifiers, Payroll Data
Wealth Management	To provide overall support in connection with existing or former accounts, including Trust services that may involve account transition and termination	Associated Characteristics, Contact Data, Legal Transactions, Online Activity, Sensitive Personal Information

European Economic Area (EEA)/United Kingdom (UK) residents should refer to the EEA/UK Supplement section of this Notice for more information regarding our legal basis for processing Personal Information.

Cookies and Similar Technologies

We may collect Personal Information using cookies and similar technologies when using our websites and mobile apps. See our Cookie Policy for additional details.

Disclosure of Personal Information

We may disclose Personal Information to affiliates and third parties in connection with the Services we are providing. The recipients of any such information will depend on the Services that are being provided. Disclosures may include the following categories of third parties listed in the table below:

Categories of third parties	Personal Information	Purpose of Disclosing your Personal Information
Account Management Software Service Providers	Contact Data	To help process invoices and statements to you on services we provided or transactions we conducted with you. These providers help us with the management of financial accounts and processes with tools and controls that support our organizational, operational, and legislative requirements (includes maintenance and support services)
Affiliates	Personal Information Categories provided above	For all the purposes disclosed above, Bank of America Corporation and the relevant affiliates are responsible for the management of any jointly used Personal Information
Aggregators	Account Activity, Personal Assets/ Liabilities, Identifiers, Contact Data	To provide services in our mobile and online banking experience which allow you — with your consent — to send data to a third party (e.g., Venmo, Mint)
Analytics Providers	Personal Information Categories provided above	To aggregate and/or anonymize Personal Information, improve the Services, conduct marketing, personalize the Services and for security and fraud prevention and operations and general business
Beneficial Owner Registries required by relevant regulators	Personal Information as required by law, rules, or regulations	If you are a beneficial owner, to share your Personal Information to the extent required by the relevant Beneficial Owner Registries in the jurisdiction applicable to you
Clients — Complaint matters	Personal Information, Account Activity, Assets/Liabilities	Client complaint reporting
Communication and Collaboration Software and Software Services providers	Identifiers, Personal Data — Minors, Contact Data	To service your accounts and share transaction documents with you. This includes providers that enable individuals and teams to work together over geographic distances by providing tools that aid communication, collaboration and the process of problem solving (includes appliances, maintenance, and support services)
Corporate Business Application vendors	Contact Data	To send you service or transactional emails or communications, as applicable and appropriate. These vendors provide software and software services to support our Global Banking and Global Markets businesses, including technology for Sales and Trading functions within Global Equities, Fixed Income Currency and Commodities, Global Research and technology for Credit, Cash Management, FX, Equipment Finance and Merchant Services within Global Banking

Categories of third parties	Personal Information	Purpose of Disclosing your Personal Information
Corporate Clients	Personal Information relevant to the Services provided to you as part of our relationship with the Corporate Client	To provide the Services contracted for by our Corporate Clients where such clients engage us to provide the Services (e.g., corporate credit cards, workplace benefits programs)
Customers — Offshore Fund Companies	Identifiers, Contact Data, Account Activity	Mutual fund rebates and reporting
Digital Commerce and Payment Services Providers	Contact Data, Online Authentication, Online Identifier	If you are a client of Global Transaction Services, to enable you to conduct transactions online and via mobile devices, to authenticate you when you log in to online portals, to access your account, review and conduct your transactions
Digital Process Automation Software Services Providers	Signature, Contact Data	To enable you to review and sign contracts with us electronically. This includes vendors who automate and digitize our transaction documentation workflow
Digital Tracking Providers	Online Behavior, Online Identifier	To improve technical and design features of our websites and platforms, including personalization. This includes companies that provide digital tracking services (like cookies, tags, etc.) and whose scripts we use to add to our webpages
External Law Firms and other professional advisors, consultants, experts	Personal Information as relevant in each specific situation	• To provide legal and compliance support, such as to prepare transactional documents with you, in support of the services we provide to you, or to defend claims involving you • To improve services and for security and fraud prevention
Hotels, Restaurants, Virtual event platforms, Transportation Companies, and Corporate Security	Contact Data, Identifiers, Personal Data — Minors, Event Data	To assist with our events management and execution
Partner Banks, including Vendors and Credit Card Partners	Account Activity, Compensation Information, Contact Data, Identifiers, Personal Data — Minors, including Personal Information as is necessary to enable us to provide you with the services	To allow our Partner Banks to process payments to or from individuals related to your account with us in places where we do not have a presence, or we are unable to provide the relevant services. Partner Banks are banks with which we have arrangements to enable us to provide the Services to you
Partners — Fund Companies	Identifiers, Contact Data, Account Activity	To manage mutual fund rebates and reporting
Regulators	Personal Information as relevant in each specific situation	To comply with regulatory requirements that obligate us to share your Personal Information
Tax Authorities and Service Providers	Contact Data, Identifiers, and other Personal Information relevant to the Services	To share your Personal Information for us comply with Foreign Account Tax Compliance Act ("FATCA"), Client Relationship Summary ("CRS") and other tax-related reporting requirements

Categories of third parties	Personal Information	Purpose of Disclosing your Personal Information
Third parties, such as an acquiring entity and its advisors, in connection with a sale or business transaction	Personal Information categories relevant to the transaction	We may disclose or transfer your Personal Information in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings)

Third-Party Services

This Notice does not address, and we are not responsible for, the privacy information or other practices of any third parties, including any third party operating any website or service to which the Services link. The inclusion of a link does not imply endorsement of the linked site or service by us or by our affiliates.

Data Retention

We keep your Personal Information as long as needed or permitted by applicable laws and regulations. The retention period may vary between regions and is determined by the reason for which we collected it. The criteria we use to determine our retention periods include: (i) the length of time we have a relationship with our client and Services we provide; (ii) whether there is a legal obligation; and (iii) whether retention is advisable for legal purposes such as statutes of limitations, litigation, or regulatory investigations.

Use of Services by Minors

Where Services allow for parents or guardians to authorize access for individuals under 18 (minors), we will obtain all applicable consents required by law and collect, use, and disclose only necessary information to provide such Services. Please see our Children's Privacy Policy for more information.

Choices and Access

Receiving electronic communications from us

If you no longer wish to receive marketing-related emails from us, you may opt out by following the instructions in the relevant electronic communication or as described in other relevant notices.

Individual rights under applicable data protection law

You may have certain rights under applicable data protection laws regarding your access to, information about or the processing of your Personal Information. Where permitted under applicable law and subject to certain exceptions, you may request:

- To access or see the Personal Information that we have about you
- To correct or amend your Personal Information if it is incorrect
- To delete or suppress your Personal Information under certain circumstances

Indonesia residents may also request the following, in accordance with applicable laws and regulations:

- To seek compensation if you have suffered harm due to the unlawful processing of your Personal Information
- To receive a copy of this Notice translated into Bahasa Indonesia

How individuals can exercise individual rights

If you would like to exercise any of the rights described above, you may contact us by emailing individualrightsrequests@bofa.com with the following information:

- Full name as it appears on your account
- The Bank of America product or service processing your Personal Information, if known
- Reference number provided by a Bank of America representative, if available

- Clear explanation of your request; If requesting a change or removal of your Personal Information, please specify which data you are referencing

We process requests in accordance with the applicable laws for your region. For your protection, requests for changes to your personal information may require further verification before processing. Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that began prior to requesting a change or deletion.

Depending on your jurisdiction, you may file a complaint with the data protection authority for your country or region, or where an alleged infringement of applicable data protection law occurs.

Jurisdiction and Cross-Border Transfer

Personal Information may be stored and processed in any province or country where we have facilities or in which we engage service providers, including the United States (Bank of America Locations). In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access Personal Information. Where required, data transfer agreements including appropriate safeguards, such as standard contractual clauses, will be put in place for transfers from countries outside of the United States.

EEA/UK Notice Supplement

We process Personal Information based on the following legal basis:

Processing Purpose	Legal Basis
Account Opening and Management	To manage our contractual relationship with you and/or to comply with a legal obligation
Aggregation and/or Anonymization	Based on our legitimate interest, such as to generate anonymized data for our own business purposes which does not identify you or another individual
Analytics and Modeling	Based on our legitimate interest, to provide modeling and analytical insights about our consumers
Client Communications and Relationship Management	To manage our contractual relationship with you, to comply with a legal obligation, and/or based on our legitimate interest, such as improving our Services
Consumer and Wealth Services	To manage our contractual relationship with you and/or to comply with a legal obligation
Corporate Client Services	To manage our contractual relationship with you and/or to comply with a legal obligation
Electronic Communications/ Digital Services	To manage our contractual relationship with you, to comply with a legal obligation, and/or based on our legitimate interest, such as improving our Services
Emergency and Incident Response	To manage our contractual relationship with you, to protect individuals' vital interests, to comply with a legal obligation, and/or based on our legitimate interest, such as ensuring the safety of our premises
Events Management	To manage our contractual relationship with you and/or based on our legitimate interest, such as improving the quality of our events and responding to complaints and concerns relating to an event
Legal, Regulatory and Compliance	To manage our contractual relationship with you, to comply with a legal obligation, including AML/KYC laws and regulations, and/or based on our legitimate interest, such as our interest in enforcing our terms and conditions and bringing and defending legal claims

Processing Purpose	Legal Basis
Marketing	Where required under applicable law, we obtain your consent to send you direct marketing communications. Where permitted by applicable law, we also engage in marketing activities based on our legitimate interest, such as to promote our Services
Monetary Transactions	To manage our contractual relationship with you and/or to comply with a legal obligation
Operations and General Business	To manage our contractual relationship with you, to comply with a legal obligation, and/or based on our legitimate interest, such as maintaining and improving our Services, identifying and preventing fraudulent transactions and cyberattacks
Personalizing our Services	Where required under applicable law, we obtain your consent to provide personalized Services. Where permitted by applicable law, we also personalize the Services based on our legitimate interest, such as providing tailored Services based on your preferences
Risk Analysis	To manage our contractual relationship with you, to comply with a legal obligation, and/or based on our legitimate interest, such as to manage our internal risk and analyze our client portfolio
Specialized Services	To manage our contractual relationship with you and/or to comply with a legal obligation

Contact Us

If you have any questions about this Notice or complaints about our processing of your Personal Information, please contact our Data Protection Officer at dpo@bofa.com.

Some of our Notices are available in additional languages. In the event of a discrepancy in the translated version, the English text shall govern.