

United Kingdom and European Union General Data Protection Regulation Privacy Notice

This Privacy Notice describes how Charles Schwab & Co., Inc.; Charles Schwab, U.K., Ltd.; and Schwab Private Client Investment Advisory, Inc. (together "Schwab," "we," "us," or "our") treat personal data of individuals in the United Kingdom (U.K.) and European Economic Area (EEA). The information in this Notice is provided pursuant to the General Data Protection Regulation (GDPR) and related legislation in the EEA and the U.K. (including the U.K.'s Data Protection Act 2018 [DPA]) with regard to how we act as data controllers.

Schwab's Data Protection Officer can be reached at +1-407-806-5334 or SchwabGDPR@Schwab.com or, if you prefer to communicate via mail, you can address your communication to Charles Schwab, U.K., Ltd. Attn: Compliance, 33 Ludgate Hill, London, EC4M 7JN, United Kingdom. Contacting Schwab through other means could impact your rights and Schwab's obligations under applicable law.

Categories of Personal Data

We collect and process the following categories of your personal data: personal contact details, identifiers, and biometric data, including personal data necessary to verify your identity; financial and commercial data; internet or other network activity data; biographical data, including professional and employment data; personal data necessary to provide requested products and services; and personal data we are legally required to obtain under the GDPR or other applicable law.

Bases for and Purposes of Data Processing

We collect and process your personal data when processing is necessary for the performance of our contract with you or in order to take steps at your request prior to entering into a contract with a Schwab entity. We also process your personal data in order to comply with applicable U.K. or EU or EU Member State Law as well as U.S. law (as we could not provide you with the required services unless we complied with applicable laws) and, as circumstances may require, when necessary for the purposes of our legitimate interests or with your consent. Depending on the products and services you use or subscribe to, your contract is with one or more of the following Schwab entities identified in your contracts and account materials:

- Charles Schwab & Co., Inc. provides investment products and services, including Schwab brokerage accounts.
- Charles Schwab, U.K., Ltd. provides services to U.K. residents promoting and arranging the financial products and services provided by Charles Schwab & Co., Inc. in the U.S.
- Schwab Private Client Investment Advisory, Inc. provides wealth management advice.

We also process your personal data for direct marketing purposes based on your consent. You maintain the ability to opt out of direct marketing from the Schwab entities you do business with. We do not undertake any automated decision-making (including profiling) that involves your personal data.

For further information about our privacy practices in the U.S., please review our Corporate Privacy Notice at [schwab.com/privacy](https://www.schwab.com/privacy).

Charles Schwab & Co., Inc. and Charles Schwab, U.K., Ltd. process the personal data of U.K. residents who receive services from Charles Schwab, U.K., Ltd. as joint controllers. This Notice, as adopted by both

joint controllers, sets out their shared responsibilities and the essence of their joint-controller relationship. The joint controller against which you exercise your data protection rights is primarily responsible for ensuring that your data protection rights are respected. In any case, both joint controllers are responsible for assisting each other to the extent necessary for either or both joint controllers to comply with their obligations to you. You can communicate with either joint controller by contacting our Data Protection Officer or by writing to the address provided at the beginning of this Notice.

Personal Data Not Obtained from You

We obtain personal data about you from other sources, including from our service providers and those publicly accessible, in order to assist us in verifying your identity, providing our products and services to you, and complying with applicable laws.

Recipients of Personal Data

We share your personal data with affiliated entities and unaffiliated service providers to help conduct our business, and these arrangements are subject to data protection agreements. We may share your personal data with our affiliates for their everyday business purposes (information about your creditworthiness) and for our affiliates to market to you, and, in each case, you maintain the ability to opt-out of our sharing of your personal data for these purposes. We may also share your personal data in connection with a merger, acquisition, corporate reorganization, or the sale of substantially all of an entity's assets, and with government authorities and regulators for purposes of this Notice.

Our service providers provide: (a) vendor services to facilitate and support the financial products and services we provide; (b) professional services, such as audit, accounting, and tax services; (c) public relations, including education and development services; (d) marketing and promotional event services; (e) market data and research; (f) network platform support services; (g) administrative services, such as printing and mailing; and (h) legal, governmental, and regulatory support (e.g., in connection with anti-money laundering and international trade sanction programs).

International Transfers

Except for Charles Schwab, U.K., Ltd., the Schwab entities listed herein are based in the U.S. (a country for which the EEA has not issued an adequacy decision on the protection of personal data). Charles Schwab, U.K., Ltd. transfers personal data to Charles Schwab & Co., Inc. in the U.S. in accordance with the GDPR. Charles Schwab, U.K., Ltd. and Charles Schwab & Co., Inc. have entered into EU Standard Contractual Clauses (SCC) for Charles Schwab, U.K., Ltd.'s transfer of personal data to Charles Schwab & Co., Inc. in the U.S. If you engage Charles Schwab, U.K., Ltd. for services, your personal data will be transferred under the SCC. You can request a copy of the SCC from our Data Protection Officer identified in the beginning of this Notice. If you engage directly with U.S. companies in the Schwab group for products and services, transfers of personal data may be made as necessary for the performance of our contract with you or the implementation of pre-contractual measures taken at your request or, as circumstances may require, your consent.

Data Storage Period

We process and store personal data for as long as is required to provide our products and services, which is typically for the duration of our contract with you or your designee. The criteria used to determine data storage (such data will be kept confidential, unless otherwise required by law) are: our responsibilities as a financial institution to comply with regulatory and legal requirements, corporate standards, and to prevent fraud and market abuse. Data storage is also determined by our requirements to maintain cyber and information security and privacy protections, as well as data integrity and systems controls.

Your Data Protection Rights

You can exercise or address these rights with any of us (subject to our data retention and other limitations and requirements under applicable law), ask questions about our use of your personal data, or raise other issues or disputes by contacting our Data Protection Officer or by writing to us at the address provided at the beginning of this Notice.

- 1. Access.** You have the right to obtain access to your personal data.
- 2. Rectification.** You have the right to ask for incorrect, inaccurate, or incomplete personal data of yours to be corrected.
- 3. Erasure.** You have the right to request that your personal data be erased.
- 4. Restriction on processing.** You have the right to request the restriction of the processing of your personal data in specific cases.
- 5. Objection to processing.** You have the right to object to the processing of your personal data for marketing purposes or on grounds relating to your particular situation.
- 6. Portability.** You have the right to receive your personal data in a machine-readable format and send it to another controller.
- 7. Withdrawal of consent.** You have the right to withdraw consent from Schwab's direct marketing.
- 8. Lodging a complaint with a Supervisory Authority.** You have the right to lodge a complaint, as applicable, with the U.K.'s Information Commissioner's Office or a Supervisory Authority within your EEA member state.

Updates

We may update or change this Privacy Notice from time to time without advance notice. Should any new Privacy Notice go into effect, we will post it on our website.

Last updated: November 13, 2020.