



CUSIP Global Services (“CGS”) (managed on behalf of the American Bankers Association (“ABA”) by S&P Global Market Intelligence LLC (“SPGMI”)), which you have a contract with or which provide services to you, (collectively or individually, as applicable, referred to as “CGS”, “ABA”, “SPGMI”, “Company”, “we”, “our”, “us”) respect your right to privacy. This Customer Privacy Policy explains how we collect, share and use personal information about you, and how you can exercise your privacy rights. If you have any questions or concerns about our use of your personal information, then please contact us using the contact details provided at the bottom of this Customer Privacy Policy.

What personal information does CGS collect and why?

The personal information that we may collect about you broadly falls into the following categories:

1. Information that you provide voluntarily

We ask you to provide certain information voluntarily, such as your contact details, user credentials, and employment information.

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For instance, this can be by way of filling in an on-line form when you register to use our products and services, when you register to attend an event, when you provide us with your business card information or when you request to receive information from us. The types of information we ask you to provide, and the reasons why we ask you to provide it, include:

Types of personal information	Why we collect it
<i>Billing information</i>	<i>To maintain your account with us.</i>
<i>Contact details including name, telephone numbers, email address and postal address.</i>	<i>To respond to correspondence and enquiries you send us. In some cases, to gather information needed to provide products and services</i>

	<i>requested by you or your employer. To obtain your feedback regarding our products and services.</i>
<i>User credentials including name, email address and personal information you provide to us in a profile.</i>	<i>To set up and maintain your user account. To monitor and enforce compliance with our contractual terms.</i>
<i>Employer and employment information such as job title, function, seniority, department, and the address/country/ city of your office.</i>	<i>To manage your individual user account which is covered by a corporate account of one of CGS's corporate customers, for instance, the corporate account of your employer.</i>
<i>Your preferences and interests, for instance which newsletters you would like to be subscribed to or what markets you are interested in.</i>	<i>To enable us to send you tailored information on our products and services across our divisions that may be of interest to you.</i>
<i>Social security numbers, credit card numbers, and personal financial data (such as specific salary, mortgage details, net worth or individual portfolio information). We refer to this type of personal data as "Sensitive Financial Data".</i>	<i>In some cases, our corporate customer or you may provide Sensitive Financial Data to us for the purpose of informing our statistical analysis or for us to use in providing our products or services to you. Sensitive Financial Data will not be used for purposes other than these, rented or otherwise made available to third parties for public distribution.</i>

2. Information that we collect automatically

We may also collect certain information automatically from your device, including information regarding your use patterns of our products and services. In some countries, including countries in the European Economic Area, this information may be considered personal information under applicable data protection laws.

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Specifically, the information we collect automatically may include information like your IP address, device type, unique device identification numbers, browser-type, broad geographic location (e.g. country or city-level location), "click stream" data and other technical information. We also collect information about how your device has interacted with our websites and products, including the pages and products accessed and links clicked.

Collecting this information enables us to better understand the visitors who come to our website and the users of our products and services, where they come from, and what content on our website and products and services is of interest to them. We use this information:

- o for our analytics purposes;*
- o to improve the quality and relevance to users, of our websites and products and services;*
- o to develop and update our websites and products and services;*
- o for customer services purposes, for instance, reviewing our customers' training needs in respect of the use of our products;*
- o to satisfy CGS's corporate customers' requests regarding the use of our products and services by the individual users licensed by their corporate account (please note that such information in many instances and jurisdictions will be offered to clients in an aggregated form); note that customers may be required by law to request such information from S&P;*
- o to send you tailored information on our products and services that we believe may be of interest or value to you and also marketing and promotional e-mails with your consent if and when required by applicable law;*
- o on rare occasions to identify unauthorized use or unauthorized distribution of our products and services related or unrelated to a security issue;*
- o where relevant, to review and / or update our pricing model agreed with our corporate customers; and*
- o for billing purposes, so that we or others (such as content providers) are able to bill for the services provided.*

Some of this information may be collected using cookies and similar tracking technology, as explained further under the heading "Cookies and similar tracking technology".

3. Information that we obtain from third party sources

From time to time, we may receive personal information about you from third party sources (including your employer or business partner if you use CGS's products covered by their corporate subscription), but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your personal information to us.

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The types of information we collect from your employer (if you use CGS products under your employer's corporate subscription) consists of your contact details and employment information.

The types of information we collect from other third parties include information regarding you as a marketing prospect. For example, we collect personal information from marketing vendors, social media sources, third party conferences, and other sources to the extent permitted by applicable law. We use the information we receive from these third parties to market our products and services across our divisions to you, to supplement personal information we have for purposes such as maintaining and correcting our records, adding supplemental data fields, and similar reasons to enhance the delivery of our products and services to you.

We collect personal information as part of our content collection process for some of our products. We obtain this from a variety of sources, including public filings and websites, to display within some of our products.

In general, we will use the personal information we collect from you or from third party sources only for the purposes described in this Customer Privacy Policy or for purposes that we explain to you at the time we collect your personal information. However, we may also use your personal information for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes) if and where this is permitted by applicable data protection laws.

Who does CGS share my personal information with?

We may disclose your personal information to the following categories of recipients:

- ABA, SPGMI and its group companies, third party service providers, product content providers, and partners;
- Your employer;
- Competent law enforcement bodies, regulatory, government agency, court or other third parties;
- Potential Buyers;
- Any other person with your consent to the disclosure.

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- ***Our group companies, product content providers and partners;***

We provide personal information to group companies, SPGMI divisions, and business partners who process personal information for purposes in line to those described in this Customer Privacy Policy or notified to you when we collect your personal information. Content providers will process your personal data for billing purposes only. A list of our current group companies is available here [<http://media.spglobal.com/documents/SP+Global+Inc's+Group+Companies.pdf>] and a list of our content providers and partners is available here: [<http://media.spglobal.com/documents/Third+Party+Services+and+Content+Provider+Categories.pdf>]. We do not sell your usage data to third parties for the purposes of their marketing third party products or services to you;

Third party service providers;

We provide personal information to third party service providers who provide data processing services to us. A list of our current service providers is available here: <http://media.spglobal.com/documents/Third+Party+Services+and+Content+Provider+Categories.pdf>;

Your employer;

We provide personal information to your employer, in many instances and jurisdictions in an aggregate form, for purposes such as to fulfil our contract with them, to inform them of potential group training needs, to inform them of product/service use by certain categories of user and for pricing purposes.

- **Competent law enforcement bodies, regulatory, government agency, court or other third parties;**

We provide personal information to any competent law enforcement body, regulatory, government agency, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;

Potential Buyers;

We provide personal information to a potential buyer (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your personal information only for the purposes disclosed in this Customer Privacy Policy;

- **Any other person with your consent to the disclosure.**

Please be aware that if you disclose personal information on website message boards or chat areas, that information may be collected and used by third parties without our knowledge and may result in unsolicited communications from third parties. Such activities are beyond the control of CGS.

Legal basis for processing personal information (EEA visitors / users only)

Our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

As a general rule, we will only collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you (for instance, your subscription to one of our products), or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms (for instance, where we process personal data regarding the usage of our products and services, as described above). In some cases, we may also have a legal obligation to collect personal information from you.

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If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), this interest will normally be to provide our products and services and communicating with you as necessary to provide our services to you and for our legitimate commercial interest, for instance, when responding to your queries, improving our products and services, advising you of product features or new releases, informing you of product maintenance, or undertaking marketing activities. We may have other legitimate interests and if appropriate it will be clear to you at the relevant time regarding what those legitimate interests are.

Where we send you communications regarding our products or services from our different divisions and affiliates that may be of interest to you, we do so based on your consent, if and when required by applicable law.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided below.

Cookies and similar tracking technology

We use cookies and similar tracking technology (collectively, “**Cookies**”) to collect and use personal information about you, including to serve interest-based advertising. For further information about the types of Cookies we use, why, and how you can control Cookies, please see our [Cookie Notice](#).

How does CGS keep my personal information secure?

We use appropriate technical and organizational measures to protect the personal information that we collect and process about you. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information.

International data transfers

Your personal information may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

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Specifically, our servers are located in various countries which may be located outside of the jurisdiction where we collected the data, such as US, Canada, United Kingdom, Ireland, Germany, the Netherlands and Singapore. This means that when we collect your personal information we may transfer it to or process it in any of the countries in which we do business.

Our group companies, third party service providers, product content providers and partners, with whom we may share personal information as described above, are located in and transfer personal information to various jurisdictions around the world.

However, we have taken appropriate safeguards to require that your personal information will remain protected in accordance with this Customer Privacy Policy. These include implementing the European Commission's Standard Contractual Clauses for transfers of personal information between our group companies, which require all group companies to protect personal information they process from the EEA in accordance with European Union data protection law.

You may request our Standard Contractual Clauses by contacting privacy_official@CUSIP.com and/or privacy@spglobal.com. We have implemented appropriate safeguards with our third party service providers and partners and further details can be provided upon request.

Data retention

We retain personal information we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a product or service you have requested, as set forth in our information governance procedures, or to comply with applicable legal, tax or accounting requirements).

When we have no ongoing legitimate business need to process your personal information, we follow our information governance procedures and either delete or anonymize your personal information, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

If you wish to receive further information about the period of time for which we will process your personal information, please contact privacy_official@CUSIP.com and/or privacy@spglobal.com.

Your data protection rights

Your rights include the right to access, correct, update or request deletion of your personal information. You also have the right to withdraw the consent you have provided to us.

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You have the following data protection rights:

- *to **access, correct, update or request deletion** of your personal information.*
- *you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information or **request portability** of your personal information.*
- *to **opt-out of marketing communications** we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you, by using the SPGMI and/or CGS contact details below, or by visiting the preference center by clicking here:*
 - *LINK to SPGMI preference center*
<https://pages.marketintelligence.spglobal.com/SPGMI-Email-Subscription-Center.html>

- *if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.*
- ***to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the European Economic Area and Switzerland are available [here](#).)*

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Notice to persons whose personal data is contained in SPGMI products (“SPGMI Products”).

Some of SPGMI Products contain personal data about persons who are directors, officers, managers or large shareholders of companies that feature in the SPGMI Products, which data SPGMI obtains from publicly available sources.

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Personal data in SPGMI Products is limited to business contact details, professional details, work data, compensation details, and education data and is obtained by SPGMI from publicly available sources.

Information in SPGMI Products is for reference only, for instance, to identify the officers or shareholders of a particular organization and, therefore, is made available to SPGMI’s customers for this purpose. Customers’ use of your personal information is restricted by their contract with SPGMI.

SPGMI customers are located anywhere in the world, including countries with data protection laws that may differ from or offer lower protections than the laws of your country. SPGMI requires its customers by contract to comply with any applicable data protection laws.

SPGMI may share personal data in its products with affiliated companies and with those parties who provide content to SPGMI. SPGMI will not use your personal data for any other purposes than as described above, which is within SPGMI's legitimate commercial interests to provide SPGMI products and services to its customers.

SPGMI updates its product information for accuracy on a regular basis. SPGMI removes data from its systems when such data becomes obsolete inaccurate and SPGMI has established data governance standards for collection, use and retention of the personal information. For information about your rights under data protection law, please refer to the relevant section above.

The controller of your personal data is SPGMI. Please see details below in section "How to contact us" for our DPO details and the details of our EU local representative.

Updates to this Customer Privacy Policy

We may update this Customer Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Customer Privacy Policy, the updated version will be posted, and we will take appropriate measures to inform you, consistent with the significance of the changes we make. If and where your consent is required by applicable data protection laws, we will obtain your consent to any material Customer Privacy Policy changes.

You can see when this Customer Privacy Policy was last updated by checking the “last updated” date displayed at the top of this Customer Privacy Policy.

How to contact us

If you have any questions or concerns about our use of your personal information, please contact us at : privacy_official@CUSIP.com and/or S&P Global Inc.'s Chief Privacy Officer and Data Protection Officer privacy@spglobal.com or by mail to: Chief Privacy Officer, S&P Global Inc., 55 Water Street, New York, NY 10041.

The Company that contracted with your employer or that you select to provide you services is the controller of your personal data. If the controller of your personal information is located outside the EEA, below are the details of the EU representative of non-EEA controller:

For CGS/SPGMI:

S&P Global UK Limited

20 Canada Square

Canary Wharf

London

E14 5LH

MIPrivacyOfficer@spglobal.com