



Last Revised December 2019

## Privacy Notice—California

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the “Important Note Regarding Client Privacy” of Deutsche Bank AG New York and its subsidiaries (collectively, “we,” “us,” or “our”) and applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We are providing this privacy notice pursuant to the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this privacy notice.

### Information we collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we do collect, and we have collected within the last twelve (12) months, the following categories of personal information from consumers:

| Category  | Examples of data we may collect (contingent upon your relationship with our organization)   | Do we collect? |
|---|---|----------------|
| A. Identifiers.   | A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers   | Yes            |
| B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).                   | A name, signature, Social Security number, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information (individuals employed by DB only), or health insurance information (for individuals employed by DB only) | Yes            |
| C. Protected classification characteristics under California or federal law.  | Age, race, color, national origin, citizenship, marital status, gender, veteran or military status  | Yes            |
| D. Commercial information.  | Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies   | Yes            |
| E. Biometric information.   | Fingerprints and toxicity screening results (collected for individuals employed by DB)  | Yes            |
| F. Internet or other similar network activity.  | Browsing history, search history, last login, information on a consumer's interaction with a website, application, or advertisement   | Yes            |
| G. Geolocation data.  | Physical location (for clients, debit card transactions only)   | Yes            |
| H. Sensory data.  | Audio recording (for recorded phone lines only, as indicated to caller, pursuant to regulatory requirements)  | Yes            |
| I. Professional or employment-related information.  | Current or past job history   | Yes            |
| J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)). | Educational background (degree, level of education completed), student financial information  | Yes            |
| K. Inferences drawn from other personal information.  | Profile information reflecting personal interests, abilities, hobbies, and investment and banking interests and behavior  | Yes            |

## Aggregate information:

To the extent permitted by applicable law, we may use, process, transfer and store customer and user data in an anonymous (or pseudonymous) and aggregated manner. We may combine such data with other information collected, including information from third-party sources. By using this website (<https://deutschewealth.com>), you understand that we may collect, use, share and store anonymized (or pseudonymized) aggregated data collected through the products and services we provide to you for benchmarking, analytics, metrics, research, reporting, machine learning and other legitimate business purposes.

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## How we use cookies and other technologies

We use certain automatic data collection technologies such as cookies, web beacons, pixel tags and other technologies to collect data, including your personal data, when users or customers visit the websites or portals, or interact with us, and may share this data with our third-party marketing vendors (including for example, advertising networks and providers of external services like web traffic analysis services and analytics tools). We explain these technologies below.

**Cookies.** Cookies are small text files placed on a computer by a web server when browsing online and are used to store user preference data so that a web server doesn't have to repeatedly request this information. A user may block cookies by activating the settings on the browser that blocks all or some cookies. However, if a user blocks all cookies (including strictly necessary cookies), a user may not be able to access all or parts of our websites or portals. We use the following cookies:

- **Strictly Necessary Cookies.** These cookies are required for the operation of our websites and portals. They include, for example, cookies that enable a customer to log-in to secure areas of our websites and portals.
- **Analytical and Performance Cookies.** These cookies allow us to recognize and count the number of users visiting our websites and portals and see how those users navigate our websites or portals. This helps us to improve our websites and portals.
- **Functionality Cookies.** These cookies recognize a user that returns to our websites or portals. This enables us to personalize our content, greet the user by name and remember preferences, for example, choice of language or region.
- **Targeting Cookies.** These cookies record visits to our websites or portals and the links followed. We use this information to improve our websites or portals and ensure the advertising displayed is relevant to users.

**Web Beacons.** A web beacon is a small pixel incorporated into a web page or email to keep track of activity on the page or email. A web beacon helps us better manage the content of our websites by informing us of what content is effective.

We obtain the categories of personal information listed above from the following categories of sources:

- **Directly from our clients or their agents.** For example, from documents that our clients provide to us related to the services for which they engage us.
- **Indirectly from our clients or their agents.** For example, through information we collect from our clients in the course of providing services to them.
- **Directly and indirectly from activity on our website (<https://deutschewealth.com/>).** For example, from submissions through our website portal or website usage details collected automatically.
- **Directly from third-parties** that interact with us in connection with the services we perform.

## Use of personal information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided.
- To address regulatory and legal requirements.
- To provide you with information regarding our products or services.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

## Personal information does not include:

- Publicly available information obtainable from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act, the Gramm-Leach-Bliley Act, the California Financial Information Privacy Act, and the Driver's Privacy Protection Act of 1994.

## Sharing personal information with service providers

We may disclose your personal information to third-party service providers to the extent necessary or appropriate in connection with our provision of services to you. The third-party service providers that receive your personal information from us must agree to keep confidential, and implement appropriate safeguards to protect, your personal information.

In the preceding twelve (12) months, we have disclosed the following categories of personal information to third-party service providers in connection with our provision of services to our clients (see table above for examples of data for each category):

- Category A: Identifiers.
- Category B: Personal information categories listed in the California Customer Records statute.
- Category C: Protected classification characteristics under California or federal law.
- Category D: Commercial information.
- Category F: Internet or other similar network activity.
- Category G: Geolocation data (physical location – for debit card transactions only).
- Category I: Professional or employment-related information (Current or past job history).
- Category J: Non-public education information (Educational background (degree, level of education completed), student financial information).
- Category K: Inferences drawn from other personal information.

We disclose our clients' personal information for a business purpose to the following categories of third parties:

- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have not disclosed the following categories of personal information for any purpose:

- Category E: Biometric information.
- Category H: Sensory data.

In the preceding twelve (12) months, we have not sold any of your personal information.

## Your rights and choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. If you are a California resident, this section describes your CCPA rights and explains how to exercise those rights.

### Access to specific information

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, in accordance with the regulation, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed your personal information for a business purpose, a list identifying the personal information categories that each recipient obtained.

### Deletion request rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.

5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal or regulatory obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

## Exercising access, data portability, and deletion rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at (866) 434-8371, Option 2 for consumer inquiries under California Consumer Privacy Act
- Emailing us at [consumerprivacyinquiries.wm@db.com](mailto:consumerprivacyinquiries.wm@db.com)

Only you or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

## Response timing and format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a fee estimate before completing your request.

## Non-discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.