

# California Privacy Notice

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the privacy notices applicable to DWS USA Corporation, DWS Group GmbH & Co. KGaA and their subsidiaries, ("DWS Entities") (collectively, "we," "us," or "our") and applies solely to visitors, users, and others who are residents of the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 ("CCPA"), as amended by the California Privacy Rights Act ("CPRA") and as amended further from time to time, and other California privacy laws. To avoid confusion, when we refer to the CCPA in this notice, we are referring to the CCPA in effect on the date this notice was last updated. Any terms defined in the CCPA have the same meaning when used in this 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, depending on the type of financial product and/or your relationship with DWS Entities, we may have collected the following categories of personal information from consumers within the last 12 months:

Category	Examples of data we may collect (contingent upon consumer relationship with our organization)	Do we collect?
A. Identifiers.	A formal 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, net worth, title, date of birth 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 information, driver's license or state identification card number, insurance information and policy number, education, employment eligibility information, employment history, bank account number, debit card number, or any other financial information, medical information (individuals employed by DWS Entities), or health insurance information (for individuals employed by DWS Entities).	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 DWS Entities).	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 information, life details, abilities, hobbies, and investment interests and behavior.	Yes
--	---	-----

We do not market or offer our products to minor children. Minor children are not authorized to use our website.

**AGGREGATE INFORMATION**

To the extent California law permits, we may use, process, transfer, and store consumer 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 our website (<https://dws.com/>), the consumer understands that we may collect, use, share, and store anonymized (or pseudonymized) aggregated data collected through the products and services for benchmarking, analytics, metrics, research, reporting, machine learning and other legitimate business purposes.

**HOW WE OBTAIN INFORMATION**

- We obtain the categories of personal information listed above from the following categories of sources:
  - Directly from consumers or their agents. For example, from documents that consumers provide to us related to the services for which they engage (or may engage) us.
  - Indirectly from consumers or their agents. For example, through information we collect from consumers in the course of providing or offering services to them.
  - Directly and indirectly from activity on websites we administer (including, <https://dws.com/>). For example, from submissions through our website portal or website usage details collected automatically.
  - From third parties that interact with us in connection with the services we perform.
  - Directly from employees, prospective employees, and contingent workers.

**HOW WE USE COOKIES AND OTHER TECHNOLOGIES ON OUR WEBSITE**

Cookies: A cookie is a very small text file that our servers send to your browser that gets stored on your computer’s hard drive. It assigns your computer a unique identifier, which in turn, becomes your identification card whenever you return to one of our websites.

Cookies can also help us provide you with a personalized on-line experience in the following ways:

- Store your username and password for future visits, making each login more efficient
- Provide you with a personalized experience by allowing us to store your preferences
- Help to ensure you obtain all requested information
- Help us deliver communications that are relevant and responsive to your interests and location, and
- Allow third-party marketing partners to use their own cookies to potentially target their relevant products to you.

Our cookies are limited to our websites only and are not designed to follow you when you surf the Internet after leaving our websites. Any marketing cookies that a third party places on your device may track your browsing history, but we do not have access to any of that information.

If you would prefer not to have the benefits of cookies, your Internet browser can be adjusted to treat cookies in different ways. Depending upon the type of browser you are using, you may be able to configure your browser so that: (i) you are prompted to accept or reject cookies on an individual basis or (ii) you may be able to prevent your browser from accepting any cookies at all. You should refer to the “privacy options” section of your web browser for specific details about cookie security. However, you should also understand that rejecting cookies might affect your ability to perform certain transactions on our websites and our ability to recognize you from one visit to the next.

Note: If you opt out of cookies through our webform, our website places a “stop” cookie on your device that effectively blocks your computer from downloading any additional DWS cookies (other than necessary cookies). Your opt-out selection may be impacted if you delete all cookies from your device.

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. We may also employ invisible 1x1 pixels, sometimes called web beacons, to count how many people visit certain web pages. Information collected from invisible pixels is used and reported in the aggregate and does not contain any personal information about you or your computer. We may use this information to improve marketing programs and website content.

## ***USE OF PERSONAL INFORMATION***

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

- To fulfil 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, you, 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.

## ***SHARING PERSONAL INFORMATION WITH SERVICE PROVIDERS***

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

In the preceding 12 months, we may have disclosed the following categories of personal information to third-party service providers in connection with providing our provision to consumers (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 E: Biometric information.
- Category F: Internet or other similar network activity.
- Category G: Geolocation data. (Physical location - for debit card transactions only)
- Category H: Sensory data.
- 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.

In the preceding 12 months, we have not sold any of the personal information we have collected.

## **YOUR PRIVACY RIGHTS**

As a California resident, you have certain rights over the collection, use, and sharing of your personal information. Those rights include a right to access, a right to correct, a right to request deletion (also called the right to be forgotten) and the right to limit the use and sharing of certain data. We describe each of these rights below. Information on how to exercise these rights comes after we describe each right.

### ***ACCESS RIGHTS***

You have the right, upon providing us a verifiable consumer request, to ask us to disclose to you the categories and specific pieces of personal information we have collected on you, unless a legal exemption applies. Unless you request otherwise, we will provide a copy of the personal information about you that we have collected in an Adobe pdf or similar file type.

You also have the right, upon providing us a verifiable consumer request, to ask us to send you a copy of the categories and specific pieces of personal information that we have collected on you, unless a legal exemption applies. This right is sometimes called the right of portability.

### ***CORRECTION RIGHTS***

You have the right to correct any erroneous personal information that we have collected about you. When making your verifiable request for correction, you must identify the specific personal information that you want us to correct.

### ***DELETION REQUEST RIGHTS***

You have the right to request that we delete any of your personal information that we collected from you and retained. 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.

In certain situations, California law exempts us from fulfilling a request to delete. If we find that an exemption applies to your request, we will tell you in our response. For instance, we may deny your deletion request if deleting the information is not technically feasible, or 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.

### ***RIGHT TO LIMIT THE SALE, SHARING, AND PROCESSING OF YOUR INFORMATION***

The DWS Entities, as a rule, do not sell or share your information with third parties (other than service providers) for marketing purposes or for targeted behavioural advertising. Since DWS does not sell or share your information with unaffiliated third parties, the Right to Limit does not apply.

### ***EXERCISING YOUR ACCESS, CORRECTION, DELETION, AND LIMITATION RIGHTS***

To exercise the access, correction, deletion, and limitations rights described above, please submit a verifiable consumer request under the CCPA to us by either:

- Option 1: Calling us toll-free at (855) 744-3355 to speak with one of our representatives directly between the hours of 8 a.m. and 5 p.m. CST.
- Option 2: Emailing us at [privacy.us@dws.com](mailto:privacy.us@dws.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.

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. We require, at least, your name and email address to verify your identity. We may request further documentation or information if the email address and name are insufficient.
- 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.

The CCPA gives you the right to make a verifiable access rights request twice in any 12-month period.

### ***RESPONSE TIMING AND FORMAT***

We do our best to respond to a verifiable consumer request within 45 days of receiving it. 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 date we receive a verifiable consumer request. 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, to the extent technically feasible.

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 cost 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.

### ***EMPLOYEE DATA***

Our California-resident employees, contingent workers, and prospective employees (job applicants) have the same rights over their employment and job application data. We do not sell or share any employee or job applicant data with anyone other than third-party service providers necessary to complete requested services (e.g., payroll and benefits management, background check vendor).

### ***BUSINESS TO BUSINESS DATA***

In the course of business with vendors, clients, service providers, and others, we may collect personal data from California-resident individuals solely because they are employees of vendors (potential or actual), clients (potential or actual), and other business partners. These individuals have the same rights over their personal data as other California consumers.

We do not sell or share any personal information, including “business-to-business” data, with anyone other than necessary third parties that are essential to completing the business between us.

Last updated January 2024.