

Effective Date: January 1, 2020

**FIDUCIARY TRUST COMPANY
CALIFORNIA CONSUMER PRIVACY ACT NOTICE**

This California Consumer Privacy Act Notice (the “Notice”) supplements the information contained in the privacy notice of Fiduciary Trust Company and its affiliates (collectively, “FTC,” “we,” “us,” or “our”) and applies solely to visitors, users, and other clients who reside in the State of California (“consumers” or “you”). We have adopted this Notice to comply with the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Capitalized terms used but not defined in this Notice have the meanings given to them in the CCPA.

FTC DOES NOT SELL ANY OF YOUR PERSONAL INFORMATION (“PERSONAL INFORMATION”) TO ANY THIRD PARTY.

The Personal Information We May Collect

In addition to the collected information listed in our privacy notice, the Personal Information we collect is determined by our relationship or interaction with each consumer. Within the last twelve (12) months, we have collected the following categories of Personal Information:

- Identifiers (such as name, email address, social security number, IP address, etc.)
- Protected legal characteristics
- Commercial information
- Internet activity regarding interaction with our website
- Employment information
- Education information

The CCPA excludes certain information collected by financial institutions under the Gramm-Leach-Bliley Act (the “GLBA”). As a result, a significant portion of the Personal Information we collect is exempt from the CCPA’s requirements.

How We Collect Your Information

The categories of Personal Information listed above are collected from the following sources:

- Directly from you or your agent (e.g., documents or verbal communications that you provide to us in connection with our services.
- Directly and indirectly from activity on our website (e.g., submissions through our website portal or website usage details collected automatically.

- Directly from third parties relating to the services that we perform (e.g., an RIA for whom we provide custodial services).

How We Use Your Personal Information

We may use or disclose your collected Personal Information to our trusted third-parties for one or more of the following business purposes:

- To provide you with information or notices regarding or services, events or news that may be of interest to you.
- To carry out our obligations arising from any contracts entered into between you and us, including for billing and collections.
- To conduct research and analysis development for the services that we provide to you.
- To respond to regulatory 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.

We require all of our trusted third parties to maintain the privacy and security of any Personal Information they process on our behalf.

Selling of Personal Information

In the preceding twelve (12) months, we have not sold any Personal Information.

CCPA Consumer Rights

Right to Disclosure of Collected Personal Information: You have the right to request a disclosure report describing our collection and use of your Personal Information over the past twelve (12) months. We will respond to your request within forty-five (45) days, or if we require more time (up to 90 days), we will inform you in writing.

Your disclosure report will contain the following:

- The categories of your Personal Information that we collected;
- The sources from which we received your Personal Information;
- Our business purpose for collecting your Personal Information;
- The categories of third parties with whom, if any, we shared your Personal Information;
- Your Personal Information that we collected; and
- Whether we sold any of your Personal Information.

Any disclosure reports that we produce will only contain Personal Information that is not subject to exceptions defined in the CCPA and other applicable laws and regulations.

Right to Request Deletion of Personal Information: You have the right to request that we delete any of your Personal Information that we have collected, except for any of your Personal Information that is subject to exceptions defined in the CCPA and other applicable laws. Once we receive and confirm your request for us to delete your Personal Information, we will delete the applicable records, unless any of the following exceptions apply and denying your request will allow us to:

- Retain any Personal Information necessary for us to provide the service(s) for which the Personal Information was collected because you elect for us to continue our service(s) to you; and
- Protect against any malicious, fraudulent or illegal activity, or take legal recourse against those responsible for such fraudulent activity.

Submitting a Consumer Request

To request either (1) a Personal Information disclosure report; or (2) the deletion of your Personal Information, please contact us at 617-482-5270 or visit <https://www.fiduciary-trust.com/privacy/>. Requests to disclose or delete your Personal Information can only be made by each consumer twice within a twelve (12) month period. Prior to us complying with a consumer request, we will need to verify your identity and/or your agent's authority to make the request, in order to confirm that the Personal Information that we retain belongs to you.

Non-Discrimination

We will not discriminate against you for the exercise of any rights under the CCPA.

Changes to this Privacy Notice

We reserve the right to amend this Notice at our discretion and at any time. Any updated version will be posted on our website.