

**Last Updated:** June 23, 2023

## California Consumer Privacy Statement

This California Consumer Privacy Statement supplements the MUFG Americas [Privacy Policy](#), and other relevant privacy policies of affiliated Mitsubishi UFJ Financial Group, Inc. entities (collectively, “Privacy Policies”) including MUFG Fund Services (USA) LLC, MUFG Capital Analytics LLC, MUFG Investor Services (US) LLC, MUFG Securities Americas Inc, First Sentier Investors, FSSA Investment Managers, Igneo Infrastructure Partners, Stewart Investors, and Mitsubishi UFJ Trust and Banking Corporation, New York Branch. It applies solely to California consumers and addresses personal information we collect online and offline. This Statement does not apply to MUFG personnel or job applicants, or information collected, processed or disclosed pursuant to the Gramm-Leach-Bliley Act and its implementing regulations or the California Financial Information Privacy Act.

This California Consumer Privacy Statement uses certain terms that have the meaning given to them in the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020, and its implementing regulations (collectively the “CCPA/CPRA”).

### 1. Notice of Collection and Use of Personal Information

We may collect (and may have collected during the 12-month period prior to the Last Updated date of this Statement) the following categories of personal information about you:

- **Identifiers:** identifiers such as a real name, alias, postal address, unique personal identifier (such as a device identifier; cookies, beacons, pixel tags, mobile ad identifiers and similar technology; customer number, unique pseudonym, or user alias; telephone number and other forms of persistent or probabilistic identifiers), online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, and other similar identifiers
- **Additional Data Subject to Cal. Civ. Code § 1798.80:** signature, physical characteristics or description, state identification card number, insurance policy number, education, bank account number, credit card number, debit card number, and other financial information, medical information, and health insurance information

*(continued)*

- **Protected Classifications:** characteristics of protected classifications under California or federal law, such as race, color, national origin, age, sex, gender, and military and veteran status
- **Commercial Information:** commercial information, including records of personal property, products or services purchased, obtained, or considered, and other purchasing or consuming histories or tendencies
- **Online Activity:** Internet and other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding your interaction with websites, applications or advertisements
- **Sensory Information:** audio, electronic, visual, and similar information
- **Employment Information:** professional or employment-related information
- **Inferences:** inferences drawn from any of the information identified above to create a profile about you reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We may use (and may have used during the 12-month period prior to the Last Updated date of this Statement) your personal information for the purposes described in our Privacy Policies and for the following business purposes specified in the CCPA/CPRA:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytics services, providing storage or providing similar services
- Providing advertising and marketing services to you, except for cross-context behavioral advertising (which is addressed in Section 6 of this Statement)
- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance
- Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with us
- Helping to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes
- Debugging to identify and repair errors that impair existing intended functionality
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

We do not collect or process sensitive personal information for purposes of inferring characteristics about consumers.

To the extent we process deidentified information, we will maintain and use the information in deidentified form and will not attempt to reidentify the information unless permitted by applicable law.

## **2. Retention of Personal Information**

We will retain your personal information for the time period reasonably necessary to achieve the purposes described in our Privacy Policy and this Statement, or any other notice provided at the time of collection, taking into account applicable statutes of limitation and records retention requirements under applicable law.

## **3. Sources of Personal Information**

During the 12-month period prior to the Last Updated date of this Statement, we may have obtained personal information about you from the following categories of sources:

- Directly from you
- From your devices, such as when you visit our websites, online and mobile applications
- Other individuals, such as authorized agents or family members
- Our affiliates and subsidiaries
- Vendors who provide services on our behalf
- Our joint marketing partners
- Government entities and other publicly-available sources
- Social networks
- Data brokers

## **4. Sale or Sharing of Personal Information**

We do not sell your personal information in exchange for monetary consideration. We may disclose your personal information by allowing certain third parties (such as online advertising services) to collect your personal information via automated technologies on our websites for cross-context behavioral advertising purposes. Under California law, these kinds of disclosures may be considered a “sale” when the personal information is exchanged for non-monetary consideration, or “sharing” when the personal information

is disclosed for cross-context behavioral advertising purposes. You have the right to opt-out of these types of disclosures of your information.

We may sell or share (and may have sold or shared during the 12-month period prior to the Last Updated date of this Statement), the following categories of personal information about you to online advertising services:

- Identifiers
- Commercial Information
- Online Activity
- Inferences

We do not have actual knowledge that we sell or share personal information of minors under 16 years of age.

## **5. Disclosure of Personal Information**

During the 12-month period prior to the Last Updated date of this Statement, we may have disclosed the following categories of personal information about you for the business purposes listed above to the following categories of third parties:

### Third Parties and Categories of Personal Information

We may use (and may have used during the 12-month period prior to the Last Updated date of this Statement) your personal information for the purposes described in our Privacy Policies and for the following business purposes specified in the CCPA/CPRA:

- Performing services, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, processing payments, providing financing, providing analytics services, providing storage or providing similar services
- Providing advertising and marketing services to you, except for cross-context behavioral advertising (which is addressed in Section 6 of this Statement)
- Auditing related to counting ad impressions to unique visitors, verifying positioning and quality of ad impressions, and auditing compliance
- Short-term, transient use, including, but not limited to, nonpersonalized advertising shown as part of your current interaction with us
- Helping to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for these purposes

- Debugging to identify and repair errors that impair existing intended functionality
- Undertaking internal research for technological development and demonstration
- Undertaking activities to verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured, manufactured for, or controlled by us.

We do not collect or process sensitive personal information for purposes of inferring characteristics about consumers.

To the extent we process deidentified information, we will maintain and use the information in deidentified form and will not attempt to reidentify the information unless permitted by applicable law.

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We will retain your personal information for the time period reasonably necessary to achieve the purposes described in our Privacy Policy and this Statement, or any other notice provided at the time of collection, taking into account applicable statutes of limitation and records retention requirements under applicable law.

## **3. Sources of Personal Information**

During the 12-month period prior to the Last Updated date of this Statement, we may have obtained personal information about you from the following categories of sources:

- Directly from you
- From your devices, such as when you visit our websites, online and mobile applications
- Other individuals, such as authorized agents or family members
- Our affiliates and subsidiaries
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We may sell or share (and may have sold or shared during the 12-month period prior to the Last Updated date of this Statement), the following categories of personal information about you to online advertising services:

- Identifiers
- Commercial Information
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#### 5. Disclosure of Personal Information

During the 12-month period prior to the Last Updated date of this Statement, we may have disclosed the following categories of personal information about you for the business purposes listed above to the following categories of third parties:

##### Third Parties and Categories of Personal Information

Category of Personal Information	Category of Third Party
Identifiers	<ul style="list-style-type: none"><li>• Our affiliates and subsidiaries</li><li>• Vendors who provide services on our behalf</li><li>• Professional services organizations, such as auditors and law firms</li><li>• Our joint marketing partners</li><li>• Our business partners</li><li>• Online advertising services and networks</li><li>• Internet service providers</li><li>• Data analytics providers</li><li>• Operating systems and platforms</li><li>• Social networks</li></ul>

Category of Personal Information	Category of Third Party
	<ul style="list-style-type: none"> <li>• Data brokers</li> </ul>
Additional Data Subject to Cal. Civ. Code § 1798.80 Law	<ul style="list-style-type: none"> <li>• Our affiliates and subsidiaries</li> <li>• Vendors who provide services on our behalf</li> <li>• Professional services organizations, such as auditors and law firms</li> <li>• Our joint marketing partners</li> <li>• Our business partners</li> </ul>
Protected Classifications	<ul style="list-style-type: none"> <li>• Our affiliates and subsidiaries</li> <li>• Vendors who provide services on our behalf</li> <li>• Professional services organizations, such as auditors and law firms</li> <li>• Our business partners</li> </ul>
Commercial Information	<ul style="list-style-type: none"> <li>• Our affiliates and subsidiaries</li> <li>• Vendors who provide services on our behalf</li> <li>• Professional services organizations, such as auditors and law firms</li> <li>• Our joint marketing partners</li> <li>• Our business partners</li> <li>• Online advertising services and networks</li> <li>• Internet service providers</li> <li>• Data analytics providers</li> <li>• Operating systems and platforms</li> <li>• Data brokers</li> </ul>
Online Activity	<ul style="list-style-type: none"> <li>• Our affiliates and subsidiaries</li> <li>• Vendors who provide services on our behalf</li> <li>• Our joint marketing partners</li> <li>• Our business partners</li> <li>• Online advertising services and networks</li> <li>• Internet service providers</li> <li>• Data analytics providers</li> <li>• Operating systems and platforms</li> <li>• Social networks</li> <li>• Data brokers</li> </ul>
Sensory Information	<ul style="list-style-type: none"> <li>• Our affiliates and subsidiaries</li> </ul>

Category of Personal Information	Category of Third Party
	<ul style="list-style-type: none"> <li>• Vendors who provide services on our behalf</li> <li>• Professional services organizations, such as auditors and law firms</li> </ul>
Employment Information	<ul style="list-style-type: none"> <li>• Our affiliates and subsidiaries</li> <li>• Vendors who provide services on our behalf</li> <li>• Professional services organizations, such as auditors and law firms</li> <li>• Our business partners</li> </ul>
Inferences	<ul style="list-style-type: none"> <li>• Our affiliates and subsidiaries</li> <li>• Vendors who provide services on our behalf</li> <li>• Professional services organizations, such as auditors and law firms</li> <li>• Our joint marketing partners</li> <li>• Our business partners</li> <li>• Online advertising services and networks</li> <li>• Internet service providers</li> <li>• Data analytics providers</li> <li>• Operating systems and platforms</li> <li>• Data brokers</li> </ul>

In addition to the categories of third parties identified above, during the 12-month period prior to the Last Updated date of this Statement, we may have disclosed personal information about you with government entities, self-regulatory organizations and third parties in connection with corporate transactions, such as mergers, acquisitions or divestitures, that may assume or have assumed control of all or part of our business.

**6. California Consumer Privacy Rights**

You have certain choices regarding your personal information, as described below.

Access: You have the right to request, twice in a 12-month period, that we disclose to you the categories of personal information we have collected about you, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about you.

Correction: You have the right to request that we correct the personal information we maintain about you, if that information is inaccurate.



Deletion: You have the right to request that we delete certain personal information we have collected from you.

Opt-Out of Sale or Sharing: You have the right to opt-out of the sale of your personal information or the sharing of your personal information for cross-context behavioral advertising purposes.

**How to Submit a Request.** To submit a request to access, correct, or delete your personal information, click on the "Submit a Request" at the bottom of this page or call toll-free at 1-800-542-6015 (our menu will prompt you through your choices) Monday - Friday 9:00 am (ET) - 5:00 pm (ET). To opt-out of the sale or sharing of your personal information, visit our webpage and click on 'Do Not Sell or Share My Personal Information' in the footer of each page. If the browser you use to visit our webpage emits the Global Privacy Control signal this will happen automatically. If you would like to opt-out of the sale or sharing of your personal information associated with a different device or browser, please submit an opt-out request by clicking on the 'Do Not Sell or Share My Personal Information' or using the Global Privacy Control signal from that device and browser. Please note that if you clear your cookies on a particular browser or device, you may need to resubmit your opt-out request again from that device or browser. Like clicking on 'Do Not Sell or Share My Personal Information,' requests sent using the Global Privacy Control will apply only to the device and browser from which they are submitted. For more information about the Global Privacy Control, please visit <https://globalprivacycontrol.org>. For more information on how to opt-out of the sale or sharing of your personal information call toll-free at 1-800-542-6015 (our menu will prompt you through your choices) Monday - Friday 9:00 am (ET) - 5:00 pm (ET).

To submit a request as an authorized agent on behalf of another individual, please email [usprivacy@us.mufg.jp](mailto:usprivacy@us.mufg.jp) and provide the details regarding your request. If you designate an authorized agent to submit a request to access, correct, delete, or opt-out of the sale or sharing of your personal information on your behalf, we may require you to provide the authorized agent written permission to do so, or provide a power of attorney pursuant to Probate Code sections 4000 to 4465.

For questions or concerns about our privacy policies and practices, please contact us as described in the How to Contact Us section of our relevant Privacy Policies.

**Verifying Requests.** To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. If you submit a request to access, correct, or delete your personal information, we may require you to provide any of the following information: name, date of birth, email address, telephone number, or postal address. If you designate an authorized agent to submit a request to access, correct, delete, or opt-out of the sale or sharing of your personal information on your behalf, (a) we may require you to provide the authorized agent written permission to do so, and (b) for access, correction and deletion requests, we may require you to verify your own identity directly with us (as described above).

**Additional Information.** If you choose to exercise any of your rights under the CCPA/CPRA, you have the right to not receive discriminatory treatment by us. To the extent permitted by applicable law, we may charge a reasonable fee to comply with your request. This Statement is available in alternative formats upon request. Please contact [usprivacy@us.mufg.jp](mailto:usprivacy@us.mufg.jp) or call toll-free at 1-800-542-6015. For TDD hearing-impaired assistance through Relay Service, dial 7-1-1; provide the Relay Operator with 1-800-542-6015.

## **7. Changes to this California Consumer Privacy Statement**

We may change this California Consumer Privacy Statement from time to time and will post the revised Privacy Statement on this site. When we do, we will let you know by posting the revised Privacy Statement with a new “Last Updated” date. Any changes to this disclosure will become effective when posted unless indicated otherwise.