

Janney Privacy Addendum for California Residents

Janney Montgomery Scott and its affiliates (collectively, “Janney”) are making this disclosure to comply with certain California laws, including the California Privacy Rights Act (“CPRA”), California Consumer Privacy Act of 2018 (“CCPA”) and the California Online Privacy Protection Act of 2003 (“CalOPPA”). Terms defined in such laws have the same meaning when used here. This California addendum applies solely to Janney’s collection, use, and sharing of personal information from individuals who reside in the State of California.

This privacy addendum supplements Janney’s general notice (available at [Janney Privacy Notice](#)), but in case of any inconsistent provision, this policy overrides the general notice. Janney may update this policy periodically; in such cases, Janney will notify consumers of the changes by posting the updated policy on its website.

This notice does not apply to your relationship with Janney as a current employee, contractor, or job applicant. Please refer to the privacy notices available on Janney’s intranet and on www.Janney.com for information on the collection and processing of your personal information in these contexts.

General Privacy Practices

Below are the categories of personal information that Janney has collected from consumers during the last 12 months. Janney may collect the same categories at various points online or offline. Consumers could be either clients or employees of Janney, or other groups of California residents. The examples below are given only to provide a meaningful understanding of the category; not all examples are necessarily collected by every Janney affiliate or for a given consumer group or across all such groups.

CCPA-Defined Category	Description	Collected?
A. Identifiers	A real name, alias, postal or email address, unique personal ID, online identifier, IP address, account name, social security number, government-issued ID number, and other similar identifiers.	Yes
B. Categories listed in the California Civil Code § 1798.80(e)	Signature, physical characteristics/description, telephone number, insurance policy number, bank account number, credit/debit card number, or any other financial information, medical information, or health insurance information. (Overlaps with other categories have been excluded.)	Yes
C. Protected classification characteristics under Federal or California law	Sex, marital status, age (40 years or older), race, color, religion/creed, citizenship, national origin or ancestry, medical condition, physical/mental disability, sexual orientation, veteran or military status, genetic information.	Yes

Janney Privacy Addendum for California Residents

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	Physiological (e.g., fingerprint), biological, or behavioral characteristics.	No
F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes
G. Geolocation data	Physical location or movements.	No
H. Sensory data	Audio (e.g., voice recording), electronic (e.g., surveillance footage), visual, thermal, olfactory, or similar information.	Yes. For some departments
I. Professional or employment-related information	Current or past job history or performance evaluations.	Yes
J. Non-public education information	Education records directly related to a student maintained by an educational institution or party acting on its behalf.	No
K. Inferences from other personal information	Reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No
L. Sensitive Personal Information	Certain government identifiers (such as SSN, driver's license, passport number); an account login, financial account, debit or credit card number with any required security code, password, or credentials allowing access to an account; precise geolocation (which means within 1,850 feet of a particular person); contents of mail, email, and text messages; genetic data; biometric information processed to identify an individual; information concerning an individual's health, sex life; sexual orientation; or information about racial or ethnic origin, religious or philosophical beliefs, or union membership.	Yes

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as:

Janney Privacy Addendum for California Residents

- 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 (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Sources of Personal Information

Janney obtains the categories of personal information listed above directly from you (such as from forms or applications you complete, or through direct interactions with Janney over the phone, through email, or other communication mediums) or from other sources, including social media networks, governmental records, and publicly available information on the internet.

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; for example, if you provide us with personal information in conjunction with an order, we will use that information
- to provide you with information, products or services that you request from us;
- to provide you with email alerts, event registrations and other notices concerning our products or services, or news, that may be of interest to you;
- to improve our website and present its content to you;
- to comply with valid legal process including subpoenas, courts orders, or search warrants, and as otherwise authorized by law; in cases involving danger of death or serious injury to any person or other emergencies;
- to protect against fraudulent, malicious, abusive, unauthorized or unlawful use of our products and services;
- to advance or defend against complaints or legal claims in court, administrative proceedings, and elsewhere;
- to a third party that you have authorized to verify your account information;
- to outside auditors and regulators with your consent

Sale or Sharing of Personal Information

As noted in our general Privacy Notice, Janney does not sell the personal information of any Janney consumer. For purposes of this Notice, "sold means the disclosure of Personal or Sensitive Information to a third party for monetary or other valuable consideration. "Shared" means the disclosure of Personal or Sensitive Information to a third party for cross-context behavioral advertising.

Janney Privacy Addendum for California Residents

Online collection

In maintaining the Janney website, we gather information about our visitors. Janney routinely gathers data on website activity, such as how many people visit the site, pages they visit, how long they visit, etc. This information is obtained on an anonymous and aggregate basis and it helps us measure the use of the website's content. None of the information is associated to you as an individual. We use these statistics to monitor the performance of the website and to make improvements.

In certain cases, where users may want additional information from Janney, we will also collect information voluntarily provided to us by site visitors. This personal information includes name, address, telephone and fax numbers, email, as well as other demographic and customer information as needed. This information is collected when the visitor supplies information to us using one of our online request or contact forms. In addition, we may also request additional information that is collected through our voluntary online surveys. Janney Montgomery Scott LLC does not disclose personal information about our customers to anyone, except as requested or authorized by our customers and as required by law. Janney will use reasonable precautions to maintain the confidentiality of the information provided to us.

We may also link to external sites from our website. If you visit an external website linked from the Janney website, we are not responsible for the privacy policy, if any, used by the other website(s).

Changes in Internet technology and the services we provide on our website may result in changes to this privacy policy. Any changes that we make to the privacy policy will be posted on this website.

How Long We Retain Personal Information

The length of time that we intend to retain each category of Personal Information will depend on a number of criteria, including (i) the length of time we are required to retain Personal Information in order to comply with applicable legal and regulatory requirements, (ii) the length of time we may need to retain Personal Information in order to accomplish the business or commercial purpose(s) for which such Personal Information is collected, used or disclosed (as indicated in this Notice), and (iii) whether you choose to exercise your right, subject to certain exceptions, to request deletion of your Personal Information.

Consumer rights

Below are the key rights the CCPA has created for consumers. The last two are not relevant to Janney for reasons noted.

- 1) **Right to know** what personal information Janney has collected, disclosed, or sold about the consumer from any source over the previous 12-month period. A consumer may exercise this right up to twice during a 12-month period. Specifically, a Consumer may request that a business that collects personal information about the Consumer disclose to the Consumer the following:

Janney Privacy Addendum for California Residents

- a) The categories of personal information it has collected about that Consumer.
 - b) The categories of sources from which the personal information is collected.
 - c) The business or commercial purpose for collecting or selling personal information.
 - d) The categories of third parties with whom the business shares personal information.
 - e) The specific pieces of personal information it has collected about that Consumer.
- 2) **Right to request deletion** of the personal information Janney has collected from the consumer, subject to certain exceptions. We may deny your deletion request if retaining the information is necessary for us or our service providers to:
- a) Complete the transaction for which we collected the personal information, provide good or service that you requested, or otherwise perform our contract with you.
 - b) Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
 - c) Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
 - d) Comply with a legal or regulatory obligation.
- 3) **Right to request that we correct** inaccurate personal information that we maintain about you.
- 4) **Right to opt-out of the sale and/or sharing of your personal information.** Janney does not sell personal information.
- 5) **Right to non-discrimination for exercising any above right.** Janney does not discriminate for such reasons.

To exercise the first three rights listed above, consumers may submit a verifiable request by emailing PrivacyOfficer@Janney.com or via Janney's web portal for data subject access requests found [here](#).

Request verification and fulfillment

After receiving a request, Janney acknowledges and verifies the request. The requestor must provide certain information to prove that he or she is the same person as the consumer referred to in the request, and that we have information on file. That verification varies depending on the nature of the request and other factors as stipulated by the CCPA. Janney may ask for additional information to properly understand, evaluate, and respond to the request. Once the request is verified, Janney will attempt to fulfill it within 45 days from the day of the request or by an extension as allowed by the CCPA. Some restrictions may apply to the fulfillment of the request.

Designating an authorized agent

A consumer willing to designate an authorized agent to make a CCPA request on the consumer's behalf must provide the agent written permission in a manner that complies with the applicable California law.

Janney Privacy Addendum for California Residents

The agent must arrange to submit to Janney the proof of such permission by sending an email to PrivacyOfficer@Janney.com. In some cases, Janney may require that the consumer verifies his/her identity directly with Janney.

For more information

Please send an e-mail to PrivacyOfficer@Janney.com or call 1.800.JANNEYS.

Janney Privacy Officer
1717 Arch Street
Philadelphia, PA 19103
Attention: Information Request

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