

PRIVACY NOTICE FOR CLIENTS OF NON-U.S. BANK OF AMERICA COMPANIES

Our privacy commitment to you:

- Protect client information
- Explain how we use client information
- Offer choices on the use of client information and honour your choices
- Collect, use and process client information respectfully and lawfully

This document includes information about how Bank of America Corporation manages client information and what actions you can take:

- Information collection
- Information use
- Information sharing
- Honouring your choices
- Data security and retention
- Other privacy commitments
- Privacy Notice updates

This Privacy Notice for Clients of Non-U.S. Bank of America Companies (“Privacy Notice”) covers identifiable client information relating to an individual who has a current or former client relationship with a non-U.S. company of Bank of America Corporation. This Privacy Notice applies to current or former individual clients or individuals seeking relationships with non-U.S. companies of Bank of America Corporation and any successor of Bank of America Corporation that utilise the names: Bank of America, Banc of America, Merrill Lynch or Merrill Lynch companies using the “ML” abbreviation in their corporate name. For a complete list of Bank of America Corporation companies, please visit our website at ml.com. The term “you” refers to the individual with whom Bank of America Corporation has a current or former relationship, and “Bank of America Corporation” or “we,” “our” or “us” refers to a non-U.S. company of Bank of America Corporation with whom you have entered or are seeking to enter into a client relationship (such as the entity indicated in the account documents), and as applicable to other companies within Bank of America Corporation. This Privacy Notice is effective January 1, 2016.

We may provide other material regarding the collection, use, disclosure and processing of client information, described in account documents, on websites or as required under local laws. Note: If there is any conflict between this Privacy Notice and the account documents, the terms of the specific account documents will prevail.

INFORMATION COLLECTION

We collect, use and process various types of client information about you and your accounts to the extent appropriate for your relationship with us. The client information that we collect about you may include, but is not limited to, the following:

- personally identifiable information: information that identifies you or can be used to identify you, such as name, address, email address, telephone number and personal identifiers, such as National Identifier or number
- application information: information you provide to us on applications including assets, income and debt
- account information: information such as your credit card, ATM or cheque card number, investment account, bank account, loan or other numbers, user ID and password, security questions and codes such as mother’s maiden name
- transaction and experience information: information about transactions and account activity such as account balances, payment history, and account usage, as well as information about our communications with you, including your enquiries and our responses
- consumer report information: information from a consumer report, including credit score and credit history
- information from outside sources: information from outside sources other than consumer report information, such as information regarding employment (employer, occupation, place of work), credit and other relationships, including employment history, loan balances, credit card balances, property insurance coverage, data from public records, and other verifications by authorised persons or any information you elect to provide

As required by applicable anti-corruption, anti-bribery, anti-terrorism, anti-money laundering and other laws, we also collect information to verify your identification.

If you provide us with information about third parties (including relatives, beneficiaries and guardians), you agree to inform such third parties and obtain their consent to the processing of that information in accordance with this Privacy Notice and any other applicable laws and regulations.

INFORMATION USE

Bank of America Corporation companies including our bank, broker-dealer, credit card and mortgage affiliates and branches around the world may collect, use and process client information for several purposes. For example:

- to provide you with products and services
- to facilitate transactions
- to provide you with advice and guidance
- to allow you to apply for products (prequalify for a mortgage, apply for a credit card or other financial products) and evaluate your eligibility for such a product
- to service, maintain or collect on accounts
- to respond to client requests
- to detect, prevent and investigate fraud
- to provide security for our clients, employees and the general public
- to verify your identity (or the identity of your representative or agent)
- to record transactions in public records such as mortgages
- to perform risk management, including credit risk analysis
- to perform insurance functions
- to comply with applicable laws, rules and regulations, including anti-terrorism, anti-money laundering, and tax reporting rules and regulations
- to comply with legal processes; to respond to requests from public, regulatory or government authorities (including authorities outside your country of residency); and to allow us to pursue remedies and limit damages
- to perform internal business processes such as data analysis, audits, and developing and improving new products and services

Client information does not include aggregated and de-identified data that we may create or compile from various sources, including accounts and transactions. This information, which does not identify individual clients, is used for business purposes, such as offering products or services, conducting research, marketing or analysing market trends and other purposes consistent with applicable laws.

INFORMATION SHARING

Transfers of client information to other countries

Your information may be transferred around the world to countries in which Bank of America Corporation companies do business, including to affiliates, service providers or third parties, which may be located in jurisdictions that may not have the same data protection laws as those in your country of residence. In such circumstances, we are responsible for ensuring that your information continues to be protected.

With our affiliates

Bank of America Corporation companies around the world share client information with each other for all of the purposes described in this Privacy Notice. All Bank of America affiliates are committed to protecting client information and to using it only for legitimate purposes.

With service providers

Bank of America Corporation companies around the world may share any of the categories of client information with service providers that work for us in any of the countries in which we operate. We supervise our service providers and require them to appropriately protect our client information. These service providers may include:

- customer service, payment or transaction processing companies
- debt collection agencies
- cheque and statement printing companies
- order fulfillment, market research, surveying, or professional services organisations (such as legal, audit, accounting services, technology, and data processing companies)
- technology hosting (such as webhosting, cloud computing, infrastructure provision, application service providers, data centre services and technology service providers)

With other third parties

Bank of America Corporation companies around the world may also share client information with other third parties. These third parties may include public, regulatory and government authorities, credit reporting agencies, intermediaries (such as SWIFT, a global provider of secure financial messaging services), other non-affiliated third parties as requested by you or your authorised representative, self-regulatory organisations, or judicial or law enforcement authorities. For example:

- to detect, prevent and investigate fraud
- to provide security for our clients, employees and the general public
- to record transactions in public records such as mortgages
- to allow credit checks
- to manage risk management, including credit risk analysis
- to provide credit references (when requested by you)
- to trace debtors
- as part of the sale, merger or similar change of a Bank of America Corporation business
- to comply with applicable laws, rules and regulations, including anti-terrorism, anti-money laundering, and tax reporting rules and regulations
- to comply with legal processes; to respond to requests from public, regulatory or government authorities (including authorities outside your country of residency); and to allow us to pursue remedies and limit damages

Additionally, where you have a contractual relationship with a third party in connection with a product or service (such as through an outside investment manager or insurance provider), we may share information in accordance with that relationship, and the handling of information by that party will be subject to your agreement(s) with that party. If you have a relationship with us through your employer, such as through your stock option or retirement plan, then we will share plan information with your employer and handle such information in accordance with plan agreements.

HONOURING YOUR CHOICES

You have the right to request a copy of your client information and request that such client information be amended/corrected or deleted if inaccurate or incomplete, except in limited circumstances. In certain circumstances, you also have the right to oppose, for legitimate purposes, the collection or processing of your client information.

Additional information regarding your choices about how your client information is processed and used may be found in your account documentation. If you have any questions regarding your choices that are not addressed in your account documentation or in this Privacy Notice, please contact us at +1.877.222.7954 or the appropriate local number or address from your statement or account materials.

DATA SECURITY AND RETENTION

Keeping client information secure is one of our most important responsibilities. We maintain physical, technical, electronic and procedural/organisational safeguards and security measures to protect client information against accidental, unlawful, or unauthorised destruction, loss, alteration, disclosure, or access, whether it is processed by us in your local jurisdiction, the United States, or elsewhere. Appropriate employees are authorised to access customer information for legitimate and specified business purposes. Our employees are bound by a code of ethics and other internal policies that require confidential treatment of client information and are subject to disciplinary action if they fail to follow such requirements.

We process client information in a manner that is adequate, relevant and not excessive in relation to the purposes for which it is collected or further processed. We endeavour to keep client information for only so long as is necessary, for the purposes for which it was collected, to meet legal and regulatory requirements, and in keeping with the period required or permitted by law.

You can also make sure that your information is accurate by:

- reviewing your account information (for example, on a statement or in response to specific requests)
- telling us if it is incorrect by calling or writing to us at the telephone number or appropriate address for such changes on your statement or other account materials

OTHER PRIVACY COMMITMENTS

When you communicate with Bank of America Corporation companies, your telephone conversations and electronic communications, including emails, text messages and instant messages, may be monitored or recorded to the extent permitted by applicable law. For information on our online privacy practices, including the use of “cookies,” please see the online notices located on our websites.

In some jurisdictions, Bank of America Corporation may owe you a duty of confidentiality under statute and common law in relation to your client information. Those duties are qualified by your understanding and acceptance of the terms set out within this Privacy Notice. We will share and use client information in accordance with this Privacy Notice or as explained in your other account opening documentation, as permitted by local law, or as otherwise agreed upon between us. Please note, if you choose to withhold or limit our ability to share client information, we may not be able to provide you with certain information, offers or services.

PRIVACY NOTICE UPDATES

We may make changes to this Privacy Notice at any time and will inform you as required by applicable law. To receive the most up-to-date Privacy Notice, you can visit our website at ml.com/privacy or contact your financial advisor.