

PRIVACY POLICY

Last Updated: March 10, 2025

This page highlights some of the key elements of our Privacy Policy. Both this page and our Privacy Policy apply to www.conning.com, the official web site of Conning Holdings Limited and any other online resources we publish for our various products and services that may contain a link to this policy. Our Privacy Policy, contained in the pages that follow, serves to give notice about the types of personal information we collect, how we use it, who we share it with and why, and what we do to try to protect it. We delve into those matters in a fair amount of detail in the pages that follow. We encourage you to read them carefully.

OUR COMMITMENT TO YOU

Conning Holdings Limited, (which may be referred to as “our,” “we,” or “us” “Conning,” as applicable) is committed to safeguarding the use of your Personal Data that we have. Conning makes reasonable efforts to protect the security and confidentiality of the Personal Data we have and to ensure that such information is used for proper business purposes in connection with the management or servicing of your account. Our relationship with you is our most important asset. We understand that you have entrusted us with your private information, and we do everything we can to maintain that trust. Details of our approach to privacy and how your Personal Data is collected and used are set forth in this privacy policy.

This Privacy Policy was amended as of September 18, 2024 and is effective as of that date. The English language version of this Privacy Policy is the controlling version regardless of any translation you may attempt. We will occasionally update this Privacy Policy to reflect new legislation or industry practice, company changes and customer feedback. We encourage you to review this Privacy Policy periodically to be informed of how we are protecting your Personal Information.

NAVIGATING THROUGH THIS POLICY

You can use the links below to navigate to areas of this policy that apply specifically to you, or which may otherwise be of interest:

Some Important Vocabulary	2
Collecting Your Information.....	2
Using Your Information	5
Sharing Your Information	5
Security of Your Information	6
Policy for Children	6
Links to Other Websites and Third Party Practices	6
Exercise Your Privacy Rights.....	7
Marketing and Other Correspondence	7
Client Subscriber Portals	7
Retention Period	8
Contact Us	8

This privacy policy (“**Privacy Policy**”) explains how Conning collects, uses, shares, and safeguards information about you when you engage with Conning, or you use the www.conning.com website and any associated content and materials available in connection with the website or other client portals (collectively, the “**Site**”).

- If you are (or were, at the time we collected your personal data) located in the United Kingdom (“**UK**”), the European Economic Area (“**EEA**”) and/or Switzerland should refer to our UK/EEA privacy policy [here](#), for additional information about our processing of your personal data. For staff members located in the UK, EEA or Switzerland, please refer to the staff privacy notice provided on our intranet.
- Residents of Hong Kong and data subjects whose personal information was obtained while in Hong Kong have certain additional rights. You can read about those [here](#).
- Residents of Mainland China and data subjects whose personal information was obtained while in Mainland China have certain additional rights. You can read about those [here](#).

We reserve the right to make changes to this Privacy Policy at any time and for any reason. Any changes will be reflected in a revised policy posted on the Site and we will alert you that there has been a change by updating the “Revised” date displayed on the Privacy Policy. If Conning determines that such changes materially affect your privacy rights, we will provide additional notice to you.

SOME IMPORTANT VOCABULARY

Although not itself a contract, this Privacy Policy is an important document that explains how we address some of our legal obligations, and your related legal rights, involving personal information. We’ll use this section to let you know about some words that have special meanings whenever you see them in this policy. Let’s start with the word “**policy**”, we mean the Privacy Policy you are reading now. Wherever we say “**Conning**”, “**we**”, “**us**”, or “**our**”, we mean Conning Holdings Limited and the following direct and indirect subsidiaries of Conning Holdings Limited: Conning & Company, Conning, Inc., Goodwin Capital Advisers, Inc., Conning Investment Products, Inc., Conning Asset Management Limited, Conning Asia Pacific Limited, Conning (Germany) GmbH and Pearlmark Real Estate, L.L.C. (and its subsidiaries). We use the words “**you**” and “**your**” to mean you, the reader, and other visitors to our online resources who are, in all cases, over the age of 18. This age requirement is discussed in more detail later in this policy [here](#).

When we talk about our “**online resources**”, we mean all websites, portals or other features we operate to allow you to interact with us and our systems, as well as the mobile apps we’ve created and distributed to let you interact with the content we provide. When we use the term “**vendors**” we mean it to include all analogous terms under the data privacy and security laws applicable to us such as “processors” and “sub-processors” under the European General Data Protection Regulation 2016 (“**GDPR**”), the GDPR as it forms part of the law of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 (“**UK GDPR**”) and the UK Data Protection Act 2018 (“**DPA**”), “data user” and “data processor” under the Personal Data (Privacy) Ordinance (“**PDPO**”).

Lastly, when we refer to “**personal information**” or “**Personal Data**”, we mean information that can be used to identify or easily be linked to you. The privacy laws in some jurisdictions include unique elements in what they consider to be the personal information or personal data of the data subjects they protect. If those laws apply to us, as in the case of GDPR, DPA or PDPO, then, when the context requires, our use of the phrase “personal information” includes personal data and the unique elements required by such laws.

COLLECTING YOUR INFORMATION

We may collect information about you in a variety of ways but generally speaking it is done either through (1) the personal information we receive during the course of providing our service or (2) you visiting our websites or client portals. The types of information we may collect include, but are not limited to:

Information You Provide To Us. This is Personal Data you choose to provide in connection with completing an online form, providing content on the Site, or other activities in which you participate on the Site, including your name, email address, and other contact details; employer information, issues of interest (to the extent that this amounts to Personal Data) payment details and billing information.

Financial Information. To ensure that the advice and/or products Conning provides you are appropriate for you and the investments you purchase are suitable for you we may also collect details of the transactions you conduct with Conning, subscriptions or holdings with a Conning entity or a Conning affiliate that you have made or initiated.

Compliance Information. We may collect Personal Data which establishes your identity, such as government ID, or information about you from third parties, related to fraud, offences, suspicious transactions, politically exposed person and sanctions lists where your details are included.

Information We Collect About You. Information our servers automatically collect when you visit, use, or browse the Site, such as your IP address, your operating system, browser version, the address of a referring website, the pages you visit on the Site, the dates and times you visit the Site, device and usage information, such as language preferences, referring URLs, country, location, information about how and when you use our services and other technical information. If you access the Site from a mobile device, information about the type of mobile device you use.

Legal Obligation. If you visit our offices or call our employees, where Conning has a legal obligation to do so, it will monitor or record meetings with/calls to Conning's trading desk, business development team and investment team to establish a record of its communications as required by applicable law or regulation. If you do not wish to have your calls/meetings recorded, you have other options to conduct business with Conning such as online, or by contacting Conning in writing. Conning (or site management companies) may record (or receive recordings of) CCTV footage in and around Conning's premises and other locations for the safety of Conning's clients and employees, and to protect against theft, property damage and fraud.

Additional Information. Conning and other organizations may access and use certain information to prevent fraud, money laundering and terrorism as may be required by applicable law and regulation and best practice at any given time, including checking against sanctions, politically exposed persons (PEP) and other fraud or crime screening databases. If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies and may be recorded by Conning or by them. In the course of providing these services, Conning may receive sensitive data such as criminal history, government identifiers, and data revealing racial or ethnic origin, religious beliefs, mental or physical health condition or diagnosis, sex life, sexual orientation or citizenship or immigration status.

Visitors and Users of our Online Resources

If you visit and/or use our online resources, we collect and retain a very limited amount of personal information through automated/technical means. In addition to that, if you choose to participate in, or make use of certain activities and features available via our online resources, you will need to provide us with information about yourself. We describe that type of voluntary submission immediately below. ***By using our online resources, you are signifying to us that you agree with this section of our policy and that we may use and disclose your information as described.***

Voluntarily Submitted Information.

Here are some of the ways you voluntarily give us your personal information. The types of personal information you will be submitting to us in these situations is almost always limited to identifiers such as your name, email address, mailing address and phone number.

- **Emails, Texts and Online Forms** – If you choose to send us an email from our “contact us” link or a similar link, or fill out an online form, you will be giving us your email address and any other personal information that may be in your message or attached to it. The same is true if you send us a text message.
- **Creating Accounts; Signing up for Newsletters** – If we make an account creation feature available to the general public (that is, to visitors/users who are not our customers or workforce members) you will be giving us at least your email address and potentially other identifiers. The same is true if you

sign up to receive a newsletter or other informational or marketing material we publish.

- **Purchasing Certain Products and Services** – When you decide to purchase certain products or service from us, such as one of our publications or subscriptions, you will need to provide us with certain information such as your name, address, email address and financial information in order to process your request.
- **Registering for Events** – When you register for events, conferences or programs we ourselves may host (rather than outsource to a third party event manager with its own privacy policies), you will be submitting the types of identifiers described above. If the event requires a fee, we may also ask you to submit credit card or other financial information.
- **Social Media and Community Features** – Some of our online resources may offer social media-like community features letting users post or upload messages, comments, and/or image or other files and materials. If you choose to make use of these features the information you post, including your screen name and any other personal information, will be in the public domain and not covered/protected by this policy.
- **Customer Portals and Job Applicants** – Some of our online resources are used to help us serve our customers and allow candidates to apply for available jobs. We discuss personal information submitted for our subscriber online resources elsewhere in this policy [here](#).

If you prefer that we not receive the above-described personal information, please don't submit it. This means you shouldn't participate in the applicable activities or use the applicable features available from our online resources. Such participation and use is strictly your choice. By not participating, you may limit your ability to take full advantage of the online resources, but most of the content in our online resources will still be available to you.

Automatically Collected Information.

When you visit or use our online resources, basic information about your internet/electronic activity is automatically collected through your browser via tracking technologies, such as "cookies." Cookies are small text files downloaded onto your computer or mobile device. Cookies allow us to collect your IP address and recognize your computer or mobile device and store some information about your preferences for using our online resources or past actions, such as:

- the type of browser and operating system you use
- the date and time and length of your visit
- the pages visited, graphics viewed and any documents downloaded
- links to other sites you accessed from our online resources or used to navigate to our online resources

To learn more about our use of cookies, please review our Cookie Policy found [here](#).

Our Customers

We necessarily collect a lot more personal information from our customers. Customers for certain products and services enter into contracts with us. That contract is separate from this policy and has its own terms and conditions for notice of collection and governing our overall confidentiality, data privacy and data security obligations. As a result, those terms, and not this policy, apply to the personal information of customers.

Our Workforce and Job Applicants

We collect and retain the types of professional or employment related personal information you would expect an employer to have about its workforce such as name, age, home address, and personal information for payroll, tax and benefits. When the law allows or requires (such as for compliance with equal opportunity/non-discrimination laws) we may also collect characteristics of protected classifications such as race, gender, and ethnicity. Similarly, when someone applies for an open job position, including via portals or other online resources, we collect the personal information we need, and which the law allows, to evaluate their applications.

We provide notice of what personal information we collect from our workforce/applicants in our confidential human resources manuals and other documentation, or on the proprietary apps and portals we operate for such purpose doing so via confidential Conning terms and conditions published thereon. In some cases, portals and apps may be operated by third parties who transfer the personal information to us. In those situations, the legal responsibility to provide notice usually rests with the third party, not us. You can read about how we use the personal information we collect from our workforce and job applicants [here](#).

Vendors

Like all large corporate enterprises, we buy goods and services, lease equipment and office space and attend industry events. In doing so, we interact with many existing and potential vendors from whom we necessarily collect certain personal information in connection with our contractual and business relationships. Typically, the categories of personal information collected in those cases will be limited to what is often referred to as “minimum business contact information” such as name, business title, business address and business email. As a result, if legally required, we make a reasonable effort to provide notice at the point of collection, or address the question of notice in the applicable business contract.

USING YOUR INFORMATION

We use the Personal Data collected for the following purposes (and any additional purposes described in any local privacy notice that is applicable to you, as described above):

To Provide and Manage Products and Services You Have Requested. To administer Conning’s services, including to carry out its obligations arising from any agreements entered into between you and Conning, or to notify you about changes to Conning’s services and products. Conning periodically offers the contact information of its core asset management clients for the opportunity to be invited to attend conferences.

To Understand Our Clients and to Develop and Tailor Our Products And Services. Any information collected about you via the Site may be used to: help increase the efficiency and operation of the Site; deliver and improve our products and services; manage our business; monitor and analyze usage and trends to improve the Site and the user experience; generate a personal profile of you to make future visits to the Site more personalized; perform the functions and services you request; send you confirmations, updates, alerts, administrative messages, and otherwise facilitate your use of the Site; request feedback and contact you about your use of the Site; respond to your emails; compile anonymous statistical information and analyses, which we may use internally and/or provide to third parties; to support our customers and their interactions with you through our Services; market our services to you that we believe may be of interest to you; and deliver information to you that you request or that we think may be of interest to you, such as articles, news, or information about various promotions.

To Comply With Legal or Regulatory Requirements. Conning may process your Personal Data to comply with its regulatory requirements or dialogue with its regulators or defend or prosecute claims as applicable which may include disclosing your Personal Data to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world.

SHARING YOUR INFORMATION

We may share your information with our affiliates and/or third parties that perform services for or on our behalf this includes: (a) in the course of providing services to you, (b) to perform analytics on website and/or web form engagement, (c) when it is shared as part of a transfer of assets, (d) when it is shared as part of targeted advertising or cross-contextual advertising, (e) for security and fraud purposes, (f) when we are required by law

to share it and (g) where we wish to consult our professional advisors, as more fully described below and in any local privacy notice that may apply to you.

Services. To perform its services as required under your client, business partner or vendor contract with Conning, Conning may share your Personal Data for the following purposes: (a) IT services, (b) accounting and billing, (c) background checks and vetting, (d) marketing, and (e) Site security.

Analytics. We may allow selected service providers or processors, such as to use tracking technology on the Site, which will enable them to collect information about how you use the Site over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content, and better understand your online activity.

Transfer of Assets. If we reorganize or otherwise transfer some or all of our assets to another organization (such as in the course of a merger, dissolution, or liquidation), your information may be shared with the transferee; however, we will ask the transferee to honor commitments we made in this Privacy Policy.

Targeted Advertising. Conning does not sell your data in exchange for monetary consideration. In order to support tailored advertisements, offers, or content that you may find interesting when you browse the internet, Conning shares certain Personal Data with our trusted third party partners that support online advertising, data co-operatives, mobile advertising, data analytics, social media engagement, data brokers advertising networks or any other activity that may be considered cross-behavioral advertising. This transfer could be defined as a sale, sharing for cross-context behavioral advertising or targeted advertising.

Security and Fraud. We allow third parties to receive Personal Data from our users to provide both security and fraud protection to Conning. We do not control these third parties or how it is used.

Required By Law. We may share your information with legal, regulatory and/or law enforcement agencies, anti-fraud organizations and/or our advisors as permitted or required by any applicable law in response to a subpoena or other legal process or as we deem necessary to investigate or remedy any actual or potential violation of the law, our policies or to protect the rights, property, and safety of www.conning.com or others, as we deem appropriate (for example, for the detection and prevention of fraud).

Global Relay App. When using the GlobalRelay App and providing your mobile number (e.g. on a business card, or verbally in a meeting or during a call), Conning will confirm that you consent to be contacted via text message. Please note that if you consent to receiving text messages, message and data rates may apply. If you initiate a text message with a Conning employee, your consent to receive text messages from that employee is implied. You can opt out by texting STOP at any time, or by contacting the employee by email. You may also opt-out by contacting Conning's Chief Compliance Officer at the number listed below. Message frequency may vary. Conning intends to use text messaging only for conversational or informational purposes (e.g. to confirm meetings or respond to your queries), and not as part of marketing campaigns. You can text HELP for support or more information. We will not share your mobile number, nor will we share your consent to receive text messages, with third parties for marketing purposes.

SECURITY OF YOUR INFORMATION

While we take reasonable steps to protect any personally identifiable information you choose to provide via the Site from unauthorized access, please be aware that, despite our efforts, no security measures are perfect or impenetrable, and no method of data transmission can be guaranteed against any interception or other type of misuse. Any information disclosed online can potentially be intercepted and used by unauthorized parties, so please keep this in mind when disclosing any personal or personally identifiable information via the Site. To help ensure security via the Internet, we recommend you keep your browser up to date with automatic security updates enabled.

POLICY FOR CHILDREN

We do not use the Site to solicit information from or market to children under the age of 18. By using the Site, you represent that you are at least 18 years of age. We encourage parents and legal guardians to monitor their children's internet usage and to instruct their children never to provide Personal Data through the Site or any other website without parental consent. If you believe a child has provided Personal Data to us via the Site, please contact us and we will use reasonable efforts to locate and delete the information.

LINKS TO OTHER WEBSITES AND THIRD PARTY PRACTICES

The Site may contain links to third party websites. It is our intent to provide links only to other quality websites. However, we have no control over these linked websites or, for that matter, any third parties. Any information collected by websites, other than the Site, is not covered by this Privacy Policy. We are not responsible for the content or privacy and security practices and policies of any third parties, including other websites that may be linked to or from the Site. We encourage you to read the provisions of privacy policies on other websites before providing them with your Personal Data.

EXERCISE YOUR PRIVACY RIGHTS

Conning takes privacy seriously. Where applicable, data subjects have certain rights which they can request for Conning to fulfill. These requests can be made by either the data subject or an authorized agent. These rights include (subject to any different provision in a local privacy notice that may apply to you, as described above):

- A. The Right to Know.** You have the right to request that Conning disclose the personal data that Conning has collected about you;
- B. The Right to Amend.** You have the right to correct any information that Conning stores about you;
- C. The Right to Delete.** You have the right to request that Conning delete information that it maintains about you, subject to certain exceptions; and
- D. The Right to Opt Out Of Your Personal Data Being Sold or Shared.** You may opt-out of Conning sharing or selling your information.

MARKETING AND OTHER CORRESPONDENCE

If we are using your personal information to send you marketing materials (other than for the Conning Library Website or Conning Software Documentation Website), such as newsletters or product alerts via text or email, you may opt out by following the opt-out instructions described in those materials.

Please note that some of our online resources allow the use of credit cards to pay for services. These credit card transactions are processed by a third party vendor and at no time does Conning have access to the personal information you submit for these credit card transactions, nor does Conning store any personal information related to these credit card transactions.

Please see any local privacy notice that may apply to you (as described above) for more information about direct marketing and your rights in relation to it.

CLIENT SUBSCRIBER PORTALS

Where Conning has given you (or where you have chosen) a password which enables you to access certain parts of Conning's websites or client portals, you are responsible for keeping this password confidential and for complying with any other security procedures of which you have been notified by Conning. To protect your Personal Data, Conning also asks you not to share a password with anyone.

In addition to the opt-out procedures described above, please follow these opt-out procedures for the Conning Library Website and Conning Software Documentation Website as follows:

Conning Library Website

If you provided your personal information for access to the Conning Library Website (and opted-in for residents of the UK, EEA, Switzerland or Hong Kong), you may instruct us at any time not to use your personal information to

provide you with information, special offers or promotions distributed or offered by the Conning Library Website. To do so, please email us at Questions@ConningResearch.com and include the following information in your request: first name, last name, and email address. Please note that this opt-out process may take up to 30 days to complete and you may still receive materials for a period of time after you opt out and afterwards you will no longer remain an active user on the Conning Library Website.

If you have provided personal information in the past in connection with the Conning Library Website, publications, products and/or services and would like to access and update this information or render your Library Website account inactive, please send an email to Questions@ConningResearch.com and include the following information with your request: first name, last name, and email address.

Conning Software Documentation Website

If you provided your personal information for access to the Conning Software Documentation Library Website (and opted-in for residents of the UK, EEA, Switzerland or Hong Kong), you may instruct Conning at any time not to use your personal information to provide you with information, special offers or promotions distributed or offered by the Conning Software Documentation Website. To do so, please email us at softwaredoclibrary@conning.com and include the following information in your request: first name, last name, and email address. Please note that this opt-out process may take up to 30 days to complete and you may still receive materials for a period of time after you opt out.

In addition to opting out, you have the ability to access, amend and delete your personal information by contacting us using the contact information below. Please use the following procedures to access and amend your information for the Conning Library Website and Conning Software Documentation Website:

If you have provided personal information in the past in connection with the Conning Software Documentation Library Website, publications, products and/or services and would like to access and update this information or render your Conning Software Documentation Library Website account inactive, please send an e-mail to riskolutions@conning.com and include the following information with your request: first name, last name, and email address.

While Conning will make reasonable efforts to accommodate your request, Conning also reserves the right to impose certain restrictions and requirements on such access requests, if permitted or required by applicable laws. Conning may decline to process any requests that are frivolous/vexatious, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law. Conning does retain personal information from inactive accounts to comply with law, prevent fraud, collect any fees owed, resolve disputes, enforce the website terms of use and click-through agreements which incorporate this policy and to facilitate audits.

Some browsers have a “do not track” feature that lets you tell websites that you do not want to have your online activities tracked. At this time, we do not specifically respond to browser “do not track” signals.

RETENTION PERIOD

Conning only stores Personal Data for as long as it is required. This is determined by considering the purposes for which it was obtained in accordance with applicable laws. Our retention period is based on (1) the nature of our relationship with the data subject and (2) any legal obligations we are bound to fulfill. Our retention periods may vary between individual jurisdictions. Please see any local privacy notice that may apply to you (as described above) for more information.

CONTACTING US

Please see any local privacy notice that may apply to you (as described above) for more information about our contact details.

Otherwise, in order to exercise any of the rights detailed above, please contact us at 860-299-2020. We will use your email as proof of verification unless otherwise prohibited. Additionally, you may contact us using the following toll-free number: 860-299-2000 . Exercising your rights under this section will not result in any discrimination by Conning. Please note that certain conditions and exemptions apply to the exercise of many of these rights and so you will not be able to exercise them in all situations. However, we will consider and evaluate each request that we receive and respond in accordance with our legal obligations.

If you prefer, you may also contact us via physical mail at:

Conning
One Financial Plaza
Hartford,
CT 06103, USA