

## **PRIVACY POLICY**

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### **Personal Information We Collect**

The Bloomberg Group, or where relevant a designated service provider, collects personal information through the Sites, such as during registration, or when you request certain services or products or submit information to enter a sweepstakes, contest, or other promotion, or complete a survey or poll, which may include your name, phone number, email address, contact information, and password. If you do not provide certain personal information, not all functionality on the Sites will be available.

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A cookie is small text file placed on your computer. Most browsers are set to accept cookies by default. If you prefer, you can usually set your browser to disable cookies, or to alert you when cookies are being sent. The help function on most browsers contains instructions on how to set your browser to notify you before accepting cookies or to disable cookies entirely. However, note that most parts of the Sites will not function properly if you disable cookies.

### **How We Use and Disclose Your Personal Information**

The Bloomberg Group uses this information for carefully considered business purposes which also benefit our customers and which include some or all of the following:

- to provide our products and services
- to communicate with you
- to help the Bloomberg Group improve our products and services and develop new products and services
- to provide support for our products and services, and for internal quality control purposes

- to provide you with offers and promotions about services and products of the Bloomberg Group or of other parties that may be of interest to you
- to enhance your experience with the Sites, including to save your preferences and login information
- to analyze website usage and analyze use of the Sites
- to protect the interests, rights, safety, or property of the Bloomberg Group or others and to monitor compliance with and enforce any agreement with the Bloomberg Group, and enforce any restrictions or limitations on the use of the services or products on the Sites
- to operate the services, products and systems of the Bloomberg Group properly.

You may instruct the Bloomberg Group at any time not to use your personal information collected through the Sites to provide you with offers or promotions by contacting [privacy@bloomberg.com](mailto:privacy@bloomberg.com). You can also update your settings for receiving offers and promotions by clicking [here](#). Please note that it may take some time to process your request, consistent with applicable law. Please note that if you exercise choice in this manner, you will continue to receive communications concerning your account and products and services you requested, and in response to any requests for information from you.

To assist us with the uses described in this privacy policy, information we or our designated service providers have collected about you through the Sites, including your use of the Sites, may be aggregated, analyzed or enhanced with personal or other information about you that we have from other sources.

The Bloomberg Group may disclose your personal information to our affiliates (including affiliated websites and other products under common ownership or control) and our service providers, including for the purposes set out in this Privacy Policy, and to the party who authorized your use of the Sites, such as your employer. Certain information you provide on the Sites, including as part of your registration on the Sites, may be made available to other users of the Sites as part of the services available on the Sites. The Bloomberg Group may disclose to other third parties, including other users of the Sites, information about your use of the Sites and the services provided on the Sites, but only in an aggregated and unattributed manner. The Bloomberg Group may also share your personal information collected through the Sites with a sponsor or other third party ("Third-Party Providers") that provides you with offers or promotions that may be of interest to you. You may instruct the Bloomberg Group at any time not to share your personal information with such Third-Party Providers by contacting [privacy@bloomberg.com](mailto:privacy@bloomberg.com). Please note that: (i) this process may take some time to complete, consistent with applicable law; and (ii) even after such process is completed, your personal information may continue to be shared with our affiliates (including affiliated websites and other products under common ownership and control) and designated service providers.

The collection, further use and/or disclosure of your information by Third Party Providers is not the responsibility of the Bloomberg Group. Rather, such use and/or disclosure is governed by the Third-Party Providers' privacy policies.

The Bloomberg Group may also disclose your information to unaffiliated third parties if we believe in good faith that such disclosure is necessary to: (a) comply with any applicable law, rule or regulation or in response to a subpoena, court order, or other legal process, subject to Bloomberg's Law Enforcement Data Request Statement below; (b) protect the interests, rights, safety, or property of the Bloomberg Group or others; (c) monitor compliance with and enforce any terms of service on the Sites; (d) provide our services or products (including allowing a purchaser of the Bloomberg Group to continue to serve you); (e) perform other activities related to such services and products, including billing and collection; (f) provide you with offers or promotions from the Bloomberg Group; and (g) operate the systems that provide the services and products of the Bloomberg Group properly.

### **Accuracy, Security and Retention of Your of Personal Information**

Any of your personal information collected by the Bloomberg Group through the Sites is kept on secure servers. The Bloomberg Group uses security measures appropriate to the provision of the relevant product or service, such as reasonable administrative, technical, personnel, and physical measures to protect your personal information on such servers. To help us protect your privacy, you should maintain the secrecy of the username and password you set up in connection with your participation in the Sites' services. Personal information is retained for as long as is necessary for the purpose for which it is collected, including legitimate business reasons, and/or legal and regulatory requirements.

### **Public Records**

Certain databases available to registered users of the Sites may contain personal information received from third-party data suppliers. This personal information is contained in public records, publicly available information, and non-public information (collectively, "public records information"). Your use of this information is restricted to specific, legitimate purposes, and such information may not be used to violate any applicable laws, rules, or regulations.

### **Rights with respect to Your Personal Information**

Depending on the jurisdiction, you may have the right to access, correct, delete, or restrict use of certain personal information collected about you through the Sites. Depending on the jurisdiction, you may also have the right to request that we refrain from processing personal information. Please bear in mind that if you exercise such rights this may affect our ability to provide our products and services. For inquiries about your personal information, please contact us by clicking [here](#). While the Bloomberg Group will make reasonable efforts to accommodate your request, we also reserve the right to impose certain restrictions and requirements on such requests, if allowed or required by applicable laws. Please note that it may take some time to process your request, consistent with applicable laws.

If you wish to access, correct, delete, or restrict use of your personal information contained in public records information, you will need to contact the third-party supplier of the information directly. If you have any questions regarding public records information on the Sites, please contact us at [privacy@bloomberg.com](mailto:privacy@bloomberg.com).

## **Transfer of Personal Information to Other Countries**

Some of the uses and disclosures mentioned in this privacy policy may involve the transfer and processing of your personal information to and in various countries that may have different levels of privacy protection than your country. By using our products and services, you consent to such transfers and processing, including to and in the United States. Bloomberg's Intra-Group Personal Data Protection Statement below provides additional information about the transfer of personal information from the EU, EEA, and Switzerland to the United States.

## **Links to Third-Party Web Sites**

The Bloomberg Group may provide links to third-party web sites. Since we do not control third-party sites and are not responsible for any information you may provide while on such sites, we encourage you to read the privacy policies on those web sites before providing any of your information on such sites.

## **Questions Regarding This Privacy Policy**

If you have questions regarding this privacy policy, please contact us at [privacy@bloomberg.com](mailto:privacy@bloomberg.com). If you have complaints about the Bloomberg Group's processing of your personal information, you may have the right to contact the applicable supervisory authority.

## **Your California Privacy Rights**

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by the Bloomberg Group to its affiliates and/or third parties for their direct marketing purposes. To make such a request, please send an email with your first name, last name, mailing address, email address and telephone number to [privacy@bloomberg.com](mailto:privacy@bloomberg.com). Please include "California Privacy Rights" in the Subject line of your email. You may also make such a request by writing to us at:

Bloomberg L.P.  
Attn: Legal Department  
731 Lexington Avenue  
New York, NY 10022

## **Modifications to This Privacy Policy**

The Bloomberg Group reserves the right to change this privacy policy at any time by posting revisions on this web page. Such changes will be effective upon posting.

Last Updated: May 10, 2018

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## **Intra-Group Personal Data Protection Statement**

January 28, 2016

Bloomberg L.P. and its affiliates ("Bloomberg") are committed to compliance with their privacy obligations in the United States and throughout the world. This Intra-Group Personal Data Protection Statement ("Statement") sets out the privacy principles Bloomberg follows with respect to personal information that it transfers from the European Union, European Economic Area, and Switzerland (collectively, "EU") to the United States ("U.S.").

The relevant Bloomberg group companies have entered into an Intra-Group Personal Data Protection Agreement ("IGA") in order to ensure that responsibility for personal information transferred from the EU to the U.S. is clearly identified. The parties to the IGA are considered as data controllers, or data controller and data processor under applicable law.

As relevant Bloomberg companies are located in the U.S., the group companies involved in the processing shall be known as a Data Exporter and a Data Importer respectively, although there may be more than one company involved in the processing of a personal information.

The IGA incorporates unchanged EU Commission Standard Contractual Clauses for controller to controller, and controller to processor transfers, and the relevant Data Exporter and Data Importer will abide by these EU Commission Standard Contractual Clauses where personal information is transferred to or accessed from Bloomberg group companies in the U.S.

#### Contact Information

Questions or comments regarding this Statement should be submitted to Bloomberg's privacy team at the following address:

General Counsel  
731 Lexington Avenue  
New York, NY 10022  
United States

This Statement may be amended from time to time, consistent with the requirements of applicable law, and will be effective immediately.

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#### **Law Enforcement Data Request Statement**

Bloomberg will not disclose client data (which may include personal information, together "client data") except in response to requests from law enforcement, governmental, or regulatory agencies only where required to do so by law (for example, in response to valid and properly-served legal process such as a subpoena or search warrant). Bloomberg will attempt to notify its client prior to disclosing client data unless: (1) prohibited by applicable law from doing so, or (2) there are clear indications of unlawful conduct in connection with the client's use of Bloomberg services. Notwithstanding any of the foregoing, Bloomberg reserves the right to respond to urgent law enforcement requests if Bloomberg

believes in good faith that an emergency involving imminent danger of death or serious physical injury justifies such disclosure.