

Privacy Policy & Information Security Notice

Your privacy is very important to Legg Mason. We take the security, integrity, and confidentiality of your personal data very seriously. To the extent you provide us with, or where we obtain from this Website, personal data, we have set procedures for the use of that information. This Privacy Policy & Information Security Notice (“Policy”) explains what personal data we may collect, what you may provide us, and how we use and safeguard your information and data, including personal data. Any defined terms not defined herein are used as defined in the Terms and Conditions of Use.

1. Information Collected

General

Personal data is any information relating to an identified or identifiable natural person (someone who can be identified, directly or indirectly, or by reference to an identifier such as name, identification number (for example, passport, driver’s license, social security number, etc.), location or online identifier (such as GPS data, IP or MAC address, username and password), or other signifier related to that natural person.

Related to this Website we may collect and process the following personal data:

- **Registration Information:** Some of the features on the site require registration before you can use them. If you register to use the site, you choose to provide us with certain personal information such as your name, address, email address, and telephone number. You may change your password at any time.
- **Subscription Details:** Email addresses and product preference details will be captured as part of our subscription services. • **Information from Other Sources:** We may receive information about you if you use any of our vendor/partner websites, tools, or services offered through our website like our campaign vendors, literature print vendors, advertising networks, analytics providers, etc.
- **Service Information:** When you use a password or similar identifier to access the site, we will recognize your identifier and may collect various categories of information about you such as information you give us, data related to your use of the site and its services, and information about your communications with us.
- **Technical Information:** In addition to the online information that you voluntarily provide to us, we may use cookies and retain cookie information separately or with the information you provide to us. A cookie is a small piece of data assigned to the browser on your computer when you visit a website. We may use cookies for various purposes such as maintaining continuity during a session, gathering data about the use of our site, storing preferences, or recognizing return users. Your web browser may alert you or permit you to refuse, disable, or delete cookies. If you refuse cookies, you may not be able to use certain features or services on the site.

Electronic Recording

In connection with your use of this Website, we may use any form of electronic recording to record and store any communication, electronic or otherwise, between you and Legg Mason. You acknowledge the recording, retention and use by Legg Mason (and its employees, representatives and agents) of all information and data that you input during your use of the Website, including without limitation, all selections and uses of software, calculators and other tools included therein. We are required by law to maintain our communications and other records involving our interaction with you as an investor or potential investor. Please also note that if you telephone Legg Mason, calls may be monitored or recorded to maintain and improve services.

IP Address

We may collect information about your computer (including where available your IP address, operating system and browser type) for system

administration. This is used as statistical data about our visitors' browsing actions and patterns.

Cookies

This Website utilizes a variety of technologies, including some provided by third parties, including but not limited to, cookies, web beacons, pixels/tags, and other storage technologies, (collectively, “cookies”), to collect, store, measure and aggregate data about usage and browsing patterns. These technologies help us secure, analyze and tailor the site for all users and better understand how this Website is used. Some portions of this Website may require the use of cookies for full functionality. If you refuse to accept cookies, or if you disable them, you will not be able to utilize all of the features of this Website.

2. Information Usage & Disclosure

We use the personal data collected for our legitimate business interests, unless another basis for the processing is otherwise noted as follows:

To service your request - which may also require processing personal data created in the course of the business relationship with Legg Mason;

- To carry out our obligations arising from any contracts entered into between you and us;
- To allow you to participate in any interactive features of our website, if and when you choose to do so;
- To notify you about changes to our products or services;
- To comply with any applicable legal and/or regulatory requirements and any record-keeping obligations;
- To ensure that content from our Website is presented in the most effective manner for you and for your computer; or
- For purposes connected with marketing (such as events/promotional information) and client administration.

We may disclose your personal data to:

Our group companies;

- In the event of a merger or acquisition;
- To our Third Party Providers in order to maintain access to, and availability of, this Website;
- To other service providers who perform services on our behalf and at our instructions in order to support and assist us in conducting our ordinary course of business;
- To our advisors, such as legal counsel, accountants and auditors, who are required to maintain the confidentiality of any information that we share with them in their capacity as our fiduciaries;
- To enforce the Terms of this Website or any other contracts entered into between you and us; or
- To protect our rights or the rights of others, or if we are obligated to do so to comply with any legal or regulatory obligations.

We do not sell, and have not sold, any personal data, either for adults or minors, collected through this Website. Additionally, we do not transmit or market any personal data collected through this Website to any third-party marketers.

3. Information Security

We have in place necessary and appropriate administrative, technological, physical, and procedural safeguards, including, but not limited to, state-of-the-art technologies and layered security controls, corporate governance, and cybersecurity tools, as well as business continuity and disaster recovery plans and procedures, designed to protect this Website and your personal data.

Our information security program is based on legal and regulatory obligations and guidance as well as industry best practices and includes, but is not limited to: physical security, hardened and patched infrastructure, intrusion detection systems, authentication, access and

data integrity controls, password protection, virus and other malware/ransomware protection, logging and monitoring, multi-factor authentication and encryption. Legg Mason's internal information security policies include, but are not limited to: change management, vulnerability management, incident response, security training and awareness, and software development lifecycle. We restrict access using a "least privilege" model, meaning that only those authorized employees on a "need-to-know" are given access to your information, including your personal data, and for Legg Mason business purposes only.

Except as otherwise permitted by applicable law, Third Party Providers and any other service providers or our group company(ies) acting on Legg Mason's behalf are obligated to (i) keep your information and data, including your personal data, that we provide to them confidential and to follow appropriate standards of security and confidentiality in doing so, and (ii) use the information Legg Mason shares only for the services for which Legg Mason hired them and not to use or share such information for any other purpose.

These safeguards are designed to prevent or reduce the impact of cybersecurity events and are reviewed and adjusted on a regular basis and in connection with security threats and trends; however, there are inherent limitations in such plans and systems and no system should be considered infallible.

Although we strive to protect your information, including your personal data, we do not warrant or guarantee the security of any information or data you provide or transmit to us, and you do so at your own risk. In the event of a breach of the confidentiality or security of your information or personal data, Legg Mason will attempt to notify you as necessary and in compliance with applicable law so that you can take appropriate protective steps. Clients having consented to using electronic means for communications will be notified using the most current email address you have provided to us with respect to your user account.

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee its security during its transmission to our website and any transmission is at your own risk. Once we have received your information, we will use our strict procedures and security features to try to prevent unauthorized access.

If you have a password for access to non-public areas of this Website, you are responsible for all activities that occur in connection with the password. You are responsible for the confidentiality of your password and agree not to provide it to any third party. Legg Mason is not responsible for any breach of security caused by your failure to maintain the confidentiality of your password. You agree to notify Legg Mason via email at privacy@leggmason.com or by calling the Investor Services team at 800.625.4554 between the hours of 8 am – 5:30 pm EST immediately in the event of loss or theft of your password, or if you believe the confidentiality of your password has been compromised in any way, or in the event of your learning about a possible or actual unauthorized use of the non-public areas of this Website. Legg Mason reserves the right to revoke your password and your ability to access non-public areas of this website at any time without prior notice.

4. Third Party or "Linked" Websites

Our Website may contain links to and from the websites of third parties. If you follow a link to a third party, please note that these websites have their own privacy policies and information security measures and that we do not accept any responsibility or liability for these third party sites. Please check the policies of the third party sites before you submit any information or data, including personal data, to these websites.

5. Changes to this Policy

Any changes we may make to this Policy in the future will be posted on this page and we will notify you promptly of any such changes, using the email address you have provided, and your continued use of this Website after such notification will constitute your acceptance of such changes.

6. Contact Information & Data Subject Rights Requests

If you wish to exercise any of the rights you have in respect of your personal data, including but not limited to, your right to access, amend/rectify, erase, port, restrict or otherwise object to our use of your personal data as described here, you should advise Legg Mason by phone at 800.625.4554, email to privacy@leggmason.com, or in writing to the address listed below. You may designate an authorized agent to make a rights request on your behalf, subject to the identification process described below. We do not discriminate based on requests for information related to our use of your personal data, and you have the right not to receive discriminatory treatment related to the exercise of your privacy rights. You also have the right to lodge a complaint with the applicable data protection supervisory authority where you: reside, work or where the alleged infringement has taken place.

We may request information from you in order to verify your identity or authority in making such a request. This process may include providing a password/passcode, a copy of government issued identification, affidavit or other applicable documentation, i.e. written permission, if you have appointed an authorized agents to make a request on your behalf, or you are an authorized agent making such a request (such as a power of attorney or other written permission). We may require you to verify your identity directly even when using an authorized agent, unless a power of attorney has been provided. We reserve the right to deny a request submitted by an agent if suitable and appropriate proof is not provided. If you have any questions or concerns about this Policy, you may contact Legg Mason in any of the following ways:

By E-mail: privacy@leggmason.com

By Mail:

Legg Mason, 100 International Drive, Baltimore, MD 21202 Attn: Privacy
By Phone: 1-800-625-4554

Effective Date

This Legg Mason Internet Privacy Policy was last modified on December 12, 2019.

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