Savvy Investor Privacy Rider to S&P Global Market Intelligence Data Protection Appendix

This Rider supplements and amends the S&P Global Market Intelligence Data Protection Appendix ("**DPA**") with respect to the Savvy Investor platform only. In the event of any conflict between this Rider and the DPA, the terms of this Rider shall prevail with respect to Savvy Investor.

1. ADDITIONAL DEFINITIONS

1.1. "**Preference Data**" means user-selected preferences regarding content topics, email frequency, notification settings, and other platform customization options. For the Savvy Investor platform, Services Management Data shall be interpreted to include Preference Data.

1.2. "**Company Manage**r" means a designated representative of Subscriber who has administrative access to view certain Services Management Data of other Authorized Users within their organization.

1.3. "**Partner**" means a Subscriber that is an asset management company or other service provider that partners with Savvy Investor to provide content on the platform.

1.4. "**User Data**" means the name, job title, company, location, email address, preferences, and the title of the content downloaded of Authorized Users who download content provided by Savvy Investor Partners. For the Savvy Investor platform, Product Data shall be interpreted to include User Data.

2. SPECIAL PROCESSING ACTIVITIES

2.1. **Content Sharing.** When an Authorized User agrees, S&P Global will share User Data with Subscriber. Subscriber may use this information (a) to build a better picture of who is downloading their content and (b)to contact users directly by email for business purposes, provided that Subscriber is solely responsible for determining the legality of such email communications and complying with all applicable laws. S&P GLOBAL DISCLAIMS ALL WARRANTIES AS TO THE LEGALITY OF USING THE USER DATA TO COMMUNICATE WITH THE AUTHORIZED USERS. For the Savvy Investor platform, the Controller Permitted Purposes shall be interpreted to include the purposes described in this section.

1.4 **Company Manager Access.** For the Savvy Investor platform, Subscriber may designate a Company Manger who may access Services Management Data of Authorized Users who are part of Subscriber's organization. Subscriber may process the Services Management Data accessible by the Company Manager to review how its Authorized Users are accessing and using the Services. For the Savvy Investor platform, the Controller Permitted Purposes shall be interpreted to include the purposes described in this section.

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