



Global Corporate Privacy Policy

Last Updated: 1 February 2021

What is this Policy about?

S&P Global Inc. and its affiliates (collectively or individually, as applicable, referred to as "S&P Global", "Company", "we", "our", "us") respect your right to privacy. This global Corporate Privacy Policy ("Policy") explains who we are, how we collect, share and use personal information about you, and how you can exercise your privacy rights. This Policy applies to interactions we have with you via our websites, applications and other products and services including events, where you otherwise contact us and where we otherwise display or link to this Policy ("Services") or in the course of our receipt of products or services from you or your employer.

You also may have certain rights with respect to your personal information under applicable data protection laws. We have included supplemental information for certain jurisdictions in this Policy. Third parties that link from or to our Services, or from whom we collect personal information may have their own privacy policies and practices. Please review their policies to learn more about their practices.

What is this Policy about?

S&P Global is a leading provider of transparent and independent ratings, benchmarks, analytics and data to the capital and commodity markets worldwide. S&P Global's divisions include S&P Global Ratings, S&P Global Market Intelligence, S&P Dow Jones Indices and S&P Global Platts. For more information about S&P Global, please see the "[Who we are](#)" section of our website.

What personal information does S&P Global collect and why?

The information that we collect from or about you - some of which is personal information under applicable data protection laws - falls into the following broad categories:

1. Information that you provide to us



As part of our Services, you may provide certain information to us, such as your contact details, user credentials, and employment information.

A few examples include, when you fill out an on-line form to register to use our Services, such as to attend an event or to receive research through our website. You may also provide us with your business card information or other contact information as you do business with us or you request information from us. Information we ask you for and why we ask you for it include:

Types of personal information

Why we collect it

Billing information

To maintain your account with us.

Contact details such as name, telephone numbers (which may include cell/mobile numbers), email address and postal address and details of any correspondence you send us.

To respond to your correspondence and inquiries, such as when you want to learn more about our conferences and webinars.

To gather information needed to provide Services requested by you or your employer.

To obtain your feedback regarding our Services, including an event you attended, such as when we or our agents send you a customer satisfaction survey.

To receive services from you or the corporate entity you represent.

User credentials including name, email address and any personal information you provide to us when you create a profile, such as details of your education and your gender.

To set up and maintain your user account.

To monitor and enforce compliance with our contract terms.

Employer and employment information such as job title, function, seniority, department and location of your office.

To manage your individual user account when it is covered by an account of one of S&P Global's corporate customers, such as the corporate account of your employer.

Your preferences and interests, such as emails and newsletters you would like to receive, or

To enable us to send you tailored information on our Services across our divisions that may interest to you.



have opted out from receiving, or the markets, industries and conferences that interest you.

Social security/Official identification number, credit card numbers, and personal financial data (such as specific salary, mortgage details, net worth or individual portfolio information). We refer to this type of personal information as "Customer Financial Data".

Issues, questions and problems you have when using our Services, your user preferences and how you use or want to use our Services and information which you seek to analyse or manipulate within our Services and which you communicate to our support, maintenance and training staff.

In some cases, our corporate customer, such as a structured finance issuer or you, may provide Customer Financial Data to us for the purpose of informing our statistical analysis or for our use in providing our Services. Customer Financial Data will not be used for purposes other than these, and will not be rented or otherwise made available to third parties for public distribution.

To maintain your account with us, provide technical support to that account, remedy issues or problems with that account, train you in the use of our Services and keep an auditable record of all such communications and actions which is accessible to our support, maintenance and training staff globally.

2. Information that we collect from you automatically

We may collect information automatically from your device, including information regarding how you use our Services.

Information we collect automatically includes your log-in events (when, how and for how long you log into and use certain Services), IP or MAC address, device make, model and operating system, mobile network information, internet service provider, unique device identification number, advertising ID, browser type and language, geographic location (e.g. country or city level location or time zone) and other technical information. We collect "click stream" data, which is information about how your device interacts with our Services, such as the pages, screens, functions, applications and products accessed and links clicked.

This information helps us understand users of our Services, such as visitors to our websites, the pages they visited before and after and what content functions interest them. We use this automatically-collected information:



- for our analytics purposes, including to enhance our understanding of usage of our Services;
- to improve the quality and relevance to users of our Services, including (with consent as applicable) by showing or offering users relevant Services based on their preferences and usage habits;
- to develop or accelerate research, analysis, news and related editorial content and information collection as part of our Services, or to enable others to develop/accelerate such content where permitted;
- to offer you support with and training on our Services and to help resolve any errors or technical issues;
- to develop and update our Services;
- for customer services, such as evaluating our customers' training needs for our products;
- to satisfy requests from S&P Global's corporate customers regarding the entitlement to and use of our Services by individual users under their corporate accounts (this information may be offered to clients in an aggregated form and clients may be required by law to request such information);
- to deliver tailored information on our Services that may be of interest or value to you and to send you marketing and promotional e-mails with your consent if required by applicable law;
- occasionally, to identify unauthorized use or unauthorized distribution of our Services related or unrelated to a security issue;
- where relevant, to review or update pricing agreed with our customers; and
- for billing purposes, so that we or others (such as our content providers) can bill for the services provided.

Some of this information is collected using cookies and similar tracking technology - see "Cookies and similar tracking technology".

3. Information that we obtain from other sources

We may receive personal information about you from other sources (including your employer or business partner if you use Services covered by a subscription). Where you register as a user, we will endeavour to check that these third parties have your consent or are otherwise legally permitted or required to disclose your personal information to us.



The information we collect from your employer (if you use our Services under your employer's corporate subscription) consists of your contact details and employment-related information.

We collect personal information from other third parties, such as marketing vendors, survey services, social media, conferences and other events that we or others organize, and other sources to the extent permitted by applicable law. We use this information to market our Services to you, to maintain and correct our records, to add data fields, and to enhance the marketing and delivery of our Services to you.

We collect personal information as part of our content collection process for some of our products. We obtain this from a variety of sources, including third-party content providers, public filings and websites, to display within some of our products. Find out more at "How does S&P Global use personal information in products?" .

We also may use your personal information for other purposes that we explain to you at the time we collect your personal information or, if permitted by applicable data protection laws, that are compatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes).

4. Other personal information collected through our mobile apps

When you download, access or otherwise use one of our mobile apps, the information that we collect depends on your device, in-app and operating system permissions. To provide you with the functionalities of one of our apps, the app must access various functions and data on your mobile device.

When you agree, some of our apps collect the precise geo-location of your mobile device and some of our apps also collect information that may be personal information about you or others, from or about:

- Your calendar
- Your contacts and call information
- The accounts and other apps on your mobile device
- Photos (including date, time, location and contents)
- Media files, metadata and other stored information



We also automatically collect app logs and usage statistics. For example, we record when you open an app so that we can monitor which app is used, when and how, and if the app stops working, we log the "crash data", such as whether you have mobile reception, to help us identify and fix the cause.

To learn more about the specific information collected by any of our mobile apps, please check your device settings or review the platform from which you downloaded it. To stop collection of all information through one of our apps, please uninstall the app.

When you download one of our mobile apps from Apple's App Store or Google Play (each, an "**App Platform**"), you acknowledge and agree that:

- As between S&P Global and the App Platform, S&P Global is solely responsible for the app.
- The App Platform has no obligation to provide any maintenance and support services with respect to the app.
- In the event of any failure of our apps to conform to any applicable warranty: (i) you may notify the App Platform and the App Platform may refund the purchase price for the app to you (if applicable), (ii) to the maximum extent permitted by applicable law, the App Platform will have no other warranty obligation whatsoever with respect to the applications, and (iii) any other claims, losses, liabilities, damages, costs or expenses attributable to any failure to conform to any warranty is, as between S&P Global and the App Platform, S&P Global's responsibility.
- The App Platform is not responsible for addressing any claims you have relating to the app or your possession and use of the app.
- If a third party claims that an app infringes another party's intellectual property rights, as between the App Platform and S&P Global, S&P Global is responsible for the investigation, defense, settlement and discharge of any such intellectual property infringement claim.
- The App Platform and its subsidiaries are third-party beneficiaries of the applicable terms of use as they relate to your license to use the app. Upon your acceptance of the terms and conditions of our terms of use, the App Platform will have the right (and will be deemed to have accepted the right) to enforce the terms of use as related to your license of the app against you as a third-party beneficiary thereof.
- You must also comply with all third-party terms applicable through the App Platform when using the app.



How does S&P Global use and share my personal information?

We may disclose your personal information to the following categories of recipients.

Our group companies, service providers, product content providers and business partners

We share personal information with our group companies, S&P Global divisions, service providers, and business partners who or that process personal information for purposes consistent with those described in this Policy or notified to you when your personal information is collected. For example, we may share the contact information you provide when registering for an event and share event attendee lists between our S&P Global divisions and with our webinar and conference partners, to ensure that your contact information is up to date and to administer, secure, seek feedback on and promote our events. A list of our current group companies is available [here](#) and a list of our service providers, content providers and business partners is available [here](#).

Your employer

We provide personal information to your employer for purposes such as to fulfil and enforce our contract with them, to inform them of potential group training needs, to inform them of Service use by certain categories of users and for pricing purposes.

Competent law enforcement bodies, regulatory, government agency, court or other third parties

We provide personal information to any competent law enforcement body, regulatory, government agency, court or other third party when we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person.

S&P Global is regulated by various federal and state agencies, authorities and similar regulatory bodies internationally and, in the normal course of business, both in the United States of America and abroad, is the subject of government and regulatory proceedings, investigations and inquiries. Our SEC filings set this out in more detail and are available [here](#).

Potential Buyers

We provide personal information to a potential buyer (and its or our agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business. We inform the buyer that it must use your personal information only as disclosed in this Policy.



Any other person or entity

Personal information that you disclose on message boards, chat areas or our social media pages or in direct messages to other users may be collected and used by third parties without our knowledge or control. We encourage you to use caution when publicly disclosing your personal information.

What is our legal basis for processing personal information?

Our legal basis for collecting and using personal information depends on the personal information concerned, the context in which we collect it and the applicable laws and regulations.

Generally, we collect personal information from you where: we have your consent to do so; we need the personal information to perform a contract with you (for example, your subscription to one of our products) where permitted under applicable data protection laws; or, in some jurisdictions such as the European Economic Area (“EEA”), the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms or the processing is otherwise consistent with applicable law. In some cases, we are required by law to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will inform you whether the provision of your personal information is mandatory and the possible consequences if you do not provide your personal information.

Generally, if we collect and use your personal information in reliance on our legitimate interests (or those of a third party), this interest is to provide our Services to you and for our legitimate commercial interest (e.g., when responding to your queries, improving our Services, advising you of product features or new releases, informing you of product maintenance, or undertaking marketing activities).

Where we send you marketing or promotional e-mails regarding our Services from our different divisions and affiliates, we do so based on your consent, if required by applicable law.

How does S&P Global use cookies and similar tracking technology?

We use cookies and similar tracking technology (collectively, "Cookies") in certain Services (in particular our websites and some mobile applications) to collect and use personal information



about you and to serve our interest-based advertising. These technologies may also allow certain third parties to collect information about you, such as information about you clicking on advertisements or installing our Services. Where permitted by applicable law, we will deploy first party performance or analytics cookies automatically when you visit our websites. Where required by applicable law, we will obtain your consent before we place any Cookies on your device that are not strictly necessary for the functioning of our websites. To learn more, including about how to consent to or withdraw your consent to Cookies, please see our **Cookie Notice**.

We use Google Analytics to better understand how visitors use our Services. Google Analytics provides us with information about users of our Services. Google Analytics uses Cookies that Google or its affiliate DoubleClick recognizes when you visit other websites and applications. For more information about how Google collects, uses, and shares your information, including information collected through our Services, please visit the Google Privacy Policy - Partners website at **<https://www.google.com/policies/privacy/partners/>** or see Google's own Privacy Policy at **<https://policies.google.com/privacy>**.

Google Analytics uses Cookies to help us analyze how users use our Services. Personal information generated by these Cookies about your use of our Services (including your IP address) will be transmitted to and stored by Google on servers in the United States of America. On our behalf, Google will use this information to evaluate your use of our Services and will compile reports on your activity for us.

If you want to opt out of Google Analytics, you can download and install the opt-out browser add-on developed by Google for your web browser. For more information about Google Analytics' currently available opt-outs, please see **<https://tools.google.com/dlpage/gaoptout/>**.

How does S&P Global keep my personal information secure?

We protect personal information that we process with appropriate technical and organizational measures designed to provide a level of security appropriate to the risk of processing your personal information. We will notify you about any security incident involving your personal information through email, correspondence, telephone, push notification or other means, as required by applicable law.



How does S&P Global treat international data transfers?

Your personal information may be transferred to, and processed outside the country in which you are resident. These other jurisdictions may have data protection laws that are different from the laws of your country (and, in some cases, not as protective).

Our servers may be located outside of the jurisdiction where we collected the data, such as the United States of America, Canada, United Kingdom (“UK”), Republic of Ireland, Germany, the Netherlands, India and Singapore. We store and replicate your personal information on servers in other countries, in order to provide speed of access, robustness and protection against server failure.

When we collect your personal information, we may transfer it to or process it in any of the countries in which we do business. Our group companies, service providers, product content providers and business partners, with whom we may share personal information, are located in and transfer personal information to various jurisdictions around the world. The principal jurisdictions where personal information is processed by or on behalf of our group companies are the United States of America, the United Kingdom, Germany, the Republic of Ireland and Singapore. Your personal information may also be accessed from outside of the jurisdiction where we collected the data, such as the Philippines, India and Pakistan, where our back office support personnel are located for certain divisions.

Where your personal information is transferred by us or on our behalf, we use appropriate safeguards to protect your personal information in accordance with this Policy. These safeguards include implementing applicable standard contractual clauses for transfers of personal information between our group companies, which require group companies to protect personal information they transfer from the jurisdiction in which it was collected in accordance with applicable data protection law. Additional safeguards may also be implemented where personal information is transferred. Please contact us to request a copy of our appropriate safeguards.

For how long does S&P Global retain personal information?

We retain your personal information for as long as we have an ongoing legitimate business need to do so (for example, to provide you with a Service you have requested, or to comply with applicable legal, tax or accounting requirements).



Once we no longer have a legitimate business need to process your personal information, we follow our applicable information governance policies, procedures and standards and retain your information for as long as necessary to accomplish the purpose for which it was collected, following which we either delete or anonymize your personal information, or if deletion or anonymization is not possible, then we pseudonymize and/or securely store your personal information and isolate it from any further processing until deletion is possible.

Please contact us for more information about the period of time for which we will process your personal information.

What are your data protection rights?

Depending on which laws apply to your personal information, you may have the right to withdraw the consent you provided to us as well as the following data protection rights:

- to access, correct, update or request deletion of your personal information (where your personal information is no longer necessary in relation to the purposes for which we collected it), and to request a copy of your personal information in a portable format.
- to object to our processing of your personal information if we are: using legitimate interests to justify that processing, using the personal information for direct marketing purposes, or using the information for scientific or historical research purposes or statistical purposes.
- to restrict our processing of your personal information under circumstances such as when you contest the accuracy of our records about you or you make an objection.
- to data portability, or receiving in a machine-readable format any personal information that you have provided to us in order to transfer it to another controller, if we are: using consent or necessity in relation to a contract with you to justify our processing of that data. In certain jurisdictions, your right to data portability may also extend to personal information that has been generated in the course of your association with S&P Global.
- not to be subject to a decision based on solely automated processing and to have safeguards put in place if you are being profiled based on your personal information.
- to opt-out of marketing and promotional e-mails we send you at any time. You can exercise this right by clicking on the "unsubscribe" or "opt-out" link in the marketing e-mails we send you, by using the S&P Global division-specific contact details below, or by visiting the preference center for each division by clicking here:

[*S&P Global Market Intelligence preference center](#)



* **S&P Dow Jones Indices preference center**

* **S&P Global Ratings preference center**

* **S&P Global Platts preference center**

- if we collect and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted before withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

- not to be discriminated against for exercising any of the above rights.

- to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. (Contact details for data protection authorities in the EEA, Canada, Switzerland and the UK are available [here](#).)

Residents of the State of Nevada have the right to opt out of the sale of certain pieces of their information to third parties who will sell or license their information to others. If you are a Nevada resident and would like to make such a request, please email privacy@spglobal.com.

Residents of the State of California have specific rights in relation to their personal information. For more information, see our California Addendum.

We respond to requests we receive from individuals wishing to exercise their data protection rights or express any concern in accordance with applicable data protection laws and in any event within 30 days. Please note that in certain jurisdictions we may be entitled to charge a fee in connection with the exercise of these rights.

How does S&P Global use personal information in products?

Some of our products contain personal information about persons who are directors, officers, managers, significant employees, trustees or material shareholders of companies. S&P Global obtains such data from publicly available and other sources.

Our products include business contact details, professional history details, work data, compensation details, education history data, shareholding and common holding information, information about individuals' gender (displayed at an aggregated level) and information about loans taken out by or secured by individuals in connection with their business. We may also receive information about race or ethnicity, derived from government or official information (such as census data). Any race or ethnicity information is processed in aggregated, anonymized form and is not linked to individuals.



Information in our products is for reference purposes, such as to identify the officers or shareholders of a particular organization or common shareholders or officers among otherwise not obviously related corporate entities, and is made available to our customers for this purpose. Customers are required by contract to comply with applicable data protection laws and their use of personal information is restricted by their contract with S&P Global. S&P Global customers are located worldwide, including countries with data protection laws that may offer lower protections than the laws of your country.

S&P Global may share personal information in its products within its corporate group, with those parties who provide content to S&P Global and with the customers who receive those products. S&P Global will not use your personal information for any other purposes than as described above, which is within S&P Global's legitimate commercial interests to provide S&P Global Services to its customers.

S&P Global updates the information in its products for accuracy on a regular basis. S&P Global removes data from its systems when such data becomes obsolete or inaccurate and S&P Global operates data governance standards for collection, use and retention of the personal information.

What happens if this Corporate Privacy Policy is updated?

We review and update this Policy from time to time. When we do, we will note the date of the version on the Policy and post the updated version here. We will bring any material updates to your attention.

Policy changes 1 Jan 2020

We are updating our Global Corporate Privacy Policy, effective January 1, 2020. At a high level, we have made the following changes:

- Simplified the Policy language and structure to make it easier to navigate and find the information you may be looking for;
- Created jurisdiction-specific addenda for you to easily find jurisdiction-specific information, including relevant information for the California Consumer Privacy Act (CCPA) and the People's Republic of China regulations;
- Specifically call out at the start of the Policy the fact that third parties that link from our online properties and products, and the third parties from whom we may collect personal information, have their own privacy policies that may apply to the information that they collect from individuals.



Policy changes 1 February 2021

We are updating our Global Corporate Privacy Policy, effective February 1, 2021. At a high level, we have updated the policy to:

- Provide more details about information we receive from service providers or their employees and the information we collect automatically
- Provide high level information about the government and regulatory proceedings, investigations and inquiries to which S&P Global may be subject
- Provide further details about our international transfers and individuals' rights
- Publish information about our EU/UK Representative entities in light of Brexit
- Add more information about local contact details

How can you contact us?

If you have any questions or concerns about our use of your personal information, please contact our Chief Privacy Officer and Data Protection Officer at privacy@spglobal.com or 55 Water Street, New York, NY 10041.

You may also use this [personal data request form](#) to contact us or exercise any of your rights. In some of our locations, we also have local contact details that you may prefer to use as set out in the following jurisdictional supplements:

- Russian Federation
- People's Republic of China
- Japan
- State of California, United States of America

For the Philippines, you may also use email DPOPhilippines@spglobal.com.

European Union Contact Details for non-European Union S&P Global affiliates

Certain S&P Global affiliates located outside the European Union ("EU") have appointed representatives within the EU. If you are an EU resident, you may choose to contact the relevant EU representative for any data protection-related enquiries in addition to, or instead of, the contact details above. Please use the applicable contact details below.

S&P Global Ratings	S&P Global Market Intelligence
S&P Global Ratings Europe Limited Fourth Floor, Waterways House Grand Canal Quay	S&P Global Indices UK Limited, Irish branch Fourth Floor, Waterways House Grand Canal Quay



Dublin 2, Ireland <u>RatingsGDPR@spglobal.com</u>	Dublin 2, Republic of Ireland <u>MIPrivacyOfficer@spglobal.com</u>
S&P Dow Jones Indices S&P Global Indices UK Limited, Irish branch Fourth Floor, Waterways House Grand Canal Quay Dublin 2, Republic of Ireland <u>spdjiGDPR@spglobal.com</u>	S&P Global Platts S&P Global Indices UK Limited, Irish branch Fourth Floor, Waterways House Grand Canal Quay Dublin 2, Republic of Ireland <u>PlattsGDPR@spglobal.com</u>

UK Contact Details for non-UK S&P Global affiliates

Certain S&P Global affiliates located outside the UK have appointed representatives within the UK. If you are a UK resident, you may choose to contact the relevant UK representative for any data protection-related enquiries in addition to, or instead of, the contact details above. Please use the contact details below by division.

S&P Global Ratings S&P Global Ratings UK Limited 20 Canada Square Canary Wharf London E14 5LH <u>RatingsGDPR@spglobal.com</u>	S&P Global Market Intelligence S&P Global UK Limited 20 Canada Square Canary Wharf London E14 5LH <u>MIPrivacyOfficer@spglobal.com</u>
S&P Dow Jones Indices S&P Global Indices UK Limited 20 Canada Square Canary Wharf London E14 5LH <u>spdjiGDPR@spglobal.com</u>	S&P Global Platts Platts (U.K.) Limited 20 Canada Square Canary Wharf London E14 5LH <u>PlattsGDPR@spglobal.com</u>



Russian Federation

This Russian Federation Addendum ("Russian Federation Addendum") applies in relation to the processing of personal information of Russian citizens by S&P Global affiliates registered in the Russian Federation and supplements this Policy. In case of any inconsistencies between this Russian Federation Addendum and the rest of this Policy, this Russian Federation Addendum prevails.

Russian Federation Addendum

People's Republic of China

This China Addendum ("China Addendum") applies only if you are located in the People's Republic of China ("China") and supplements this Policy. In case of any inconsistencies between this China Addendum and the rest of this Policy, this China Addendum prevails.

1. **Sensitive Personal Information.** Your personal information whose leakage or unlawful use may lead to discriminatory treatment or serious damage to personal or property safety, including national identification card number, financial accounts, and personal whereabouts may be considered as sensitive personal information in accordance with applicable Chinese law and regulations. To the extent we collect this Sensitive Personal Information, we will only process it to the extent necessary for fulfilling the purposes as stated in this Policy and will take measures for its security. Where required by applicable Chinese law and regulations, we will obtain your separate consent before we process your sensitive personal information.
2. **Sale of business.** We may transfer any personal information when we sell or transfer all or a portion of our business or assets to a third party such as in the event of merger, acquisition, liquidation or similar event. We will require such third party to continue to comply with this Policy including this China Addendum or require such third party to obtain your consent again.
3. **Notifications.** We cannot absolutely guarantee the security of any information or data you provide online. In the event of a security incident, we will take mitigation measures in accordance with our incident response plan and report to competent regulators in China as required by applicable law. In the event of a security incident affecting your personal information, we will notify you as required by applicable law through email, correspondence, telephone, push notification or other means.
4. **Closure of a registered account.** If you want to close an account which is registered with S&P Global, please contact our Chief Privacy Officer at privacy@spglobal.com or DPOChina@spglobal.com or Chief Privacy Officer, at: 49/F, Fortune Financial Center, No.5, Dongsanhuan Zhong Rd, Chaoyang District, Beijing. We will handle your request and close your account within 15 business days.



Japan

This Japan Addendum ("Japan Addendum") applies in relation to the processing of personal information in Japan by S&P Global Ratings Japan Inc., S&P Global SF Japan Inc., and Standard & Poor's International LLC, Japan Branch (together "S&P Global Japan") and supplements this Policy. In case of any inconsistencies between this Japan Addendum and the rest of this Policy, this Japan Addendum prevails.

S&P Global Japan will comply with applicable Japanese data protection laws and regulations, and not use personal information for purposes which are not set forth in this Policy. The process for dealing with customers' claims is set out in this policy.

Use of personal information inside the S&P Global group

S&P Global Japan uses personal information with other entities in the S&P Global group who may use such information to provide information about our Services to our clients, conduct certain market research or contact clients. Such information includes: address, name, company name, department name, job title, phone number, fax number, e-mail address, billing information, history of personnel changes and professional employment history, records of job interviews with S&P Global Japan, your areas of interest, etc.

A list of our group companies is available [here](#).

Anonymously Processed Information provided to S&P Global Ratings Japan Inc. and S&P Global SF Japan Inc. and shared by S&P Global Ratings Japan Inc. and S&P Global SF Japan Inc. with other companies in the S&P Global group

S&P Global Ratings Japan Inc. and S&P Global SF Japan Inc. share anonymously processed information with other companies in the S&P Global group on an ongoing basis in the context of its structured finance business. The "information items relating to individuals" included in the anonymously processed information shared with those companies and the "method of sharing" those items are set out below.

"Information items relating to individuals to be shared with other companies in the S&P Global group":

- Information in relation to borrowers and joint guarantors (borrower code allocated by a creditor, age-related information, gender, address-related information, occupation-related information, annual income, account balance etc)



- Loan information relating to the individual borrower (category, loan amount, loan period, information-related to property location and evaluation amount).

"Method of sharing the anonymously processed information":

By such means as uploading or sending by e-mail to a server that only authorized S&P Global group personnel may access.

If you have any questions or concerns about our use of your personal information, please contact our Chief Privacy Officer via email at privacy@spglobal.com or Japanprivacy@spglobal.com or via mail, at: Marunouchi Kitaguchi Bldg. 28th Floor, 1-6-5 Marunouchi, Chiyoda-ku, Tokyo 100-0005, Tel: +81-(0)3-4550-8000.

State of California, United States of America

This State of California, United States of America Addendum ("California Addendum") applies in relation to the processing of personal information of residents of the State of California in the United States of America by S&P Global as required by the California Consumer Privacy Act ("CCPA") and supplements this Policy. In case of any inconsistencies between this California Addendum and the rest of this Policy, this California Addendum prevails.

Certain information we collect may be exempt from the CCPA because it is considered public information (i.e., it is made available by a government entity) or covered by a federal privacy law, such as the Gramm-Leach-Bliley Act, the Health Insurance Portability and Accountability Act, or the Fair Credit Reporting Act.

Right to Access Information

You have the right to request access to personal information collected about you and information regarding the source of that information, the purposes for which we collect it, and the third parties and service providers with whom we share it. To protect our customers' personal information, we are required to verify your identify before we can act on your request.

Right to Request Deletion of Information

You have the right to request in certain circumstances that we delete any personal information that we have collected directly from you. To protect our customers' personal information, we are required to verify your identify before we can act on your request. We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.



Right to Information Regarding Participation in Data Sharing for Financial Incentives

We will ask you for your consent before collecting your personal information in connection with offering a financial incentive.

Right to Opt Out of Sale of Personal Information to Third Parties

You have the right to opt out of any sale of your personal information by us to third parties. Please note that your right to opt out does not apply to our sharing of personal information with service providers, who are parties we engage to perform a function on our behalf and are contractually obligated to use the personal information only for that function.

"Shine the Light" Law

Residents of the State of California also have the right to request information regarding third parties to whom the company has disclosed certain categories of personal information during the preceding year for the third parties' direct marketing purposes.

How to Submit a Request

To submit a request to exercise your rights:

- (1) For Access and Deletion rights, fill out a **Data Request Form**.
- (2) For the Opt-out right, visit "**Do Not Sell My Personal Information**".
- (3) Call us on 1-855-529-1761.

The following is a description of our data collection practices, including the personal information we collect, the sources of that information, the purposes for which we collect information, and whether we disclose that information to external parties. We may use any and all of the information for any of the purposes described in the Policy, unless limitations are listed. The categories we use to describe the information are those set out in the CCPA.

• Personal Identifiers:

- o We collect your name, phone number, email address, and contact address when you create an account or register for an event, an account or event registration is created for you or you complete a transaction. If you choose to create an account, you will also be asked to create a username, and we will assign one or more unique identifiers to your profile.



o You provide us with payment and billing information when you purchase one of our products or register for a paid event.

o We collect social security numbers, credit card numbers and personal financial data from you or corporate customers such as structured finance issuers for the purpose of informing our statistical analysis or to use in providing our Services. Such data will not be used for purposes other than these, rented or otherwise made available to third parties for public distribution.

o We do not collect your Driver's License number or Passport number.

o We do not collect any medical information or health information about you.

o We collect your IP address automatically.

o We collect your Device ID automatically.

• **Protected Classifications:** We collect your age and gender.

• **Commercial Information:** When you engage in transactions with us, we create records of goods or services purchased or considered, as well as purchasing or consuming histories or tendencies. • **Biometric Information:** We do not collect information about your physiological, biological, or behavioral characteristics.

• **Internet or Other Electronic Network Activity Information:** We collect information about your browsing history, search history, and information regarding your interaction with product portals, websites, applications, or advertisements automatically when you use our Services.

• **Geolocation Data:** As described above, we collect your IP address automatically. We may be able to determine your general location based on the IP address. When you agree, some of our mobile applications will also collect your precise location (e.g., your GPS coordinates), though users can turn off location tracking in their mobile device settings.

• **Audio, electronic, visual, thermal, olfactory, or similar information:** If you contact us via phone, we may record the call. We will notify you if a call is being recorded at the beginning of the call. We may collect your image. We do not collect any thermal, olfactory, or similar information.

• **Professional or employment-related information:** We collect information about your current employer, position, and other aspects of your professional history.



- **Education information:** We collect information about the institutions you have attended or the level of education you have attained.

- **Inferences drawn to create a profile about a consumer reflecting the consumer's preferences or characteristics:** We may analyze your actual or likely preferences through a series of computer processes. On some occasions, we may add our observations to your internal profile.

We may share such information with service providers, which are external parties that we engage for business purposes and are restricted from using personal information for any purpose that is not related to our engagement. The categories of service providers with whom we share information and the services they provide are described [here](#).

The CCPA provides California residents with certain rights in relation to the "sale" of information to third parties. According to the CCPA, to "sell" personal information means to disclose it to an external party for monetary or other benefit where, for example, our contract does not restrict that party from using such information for other purposes. We may "sell" information in the following limited circumstances:

- **Personal Identifiers:**

- o We display contact information in our products, which are accessible by our subscribers and the subscribers of our business partners.
- o We disclose contact information to our webinar and conferences partners (i.e., attendee lists).
- o We provide contact information to public safety authorities where necessary.
- o We provide IP addresses and Device IDs to our advertising partners.

- **Protected Classifications:** We display age, if available, in our "Professionals" database, which is accessible by our subscribers and the subscribers of our business partners. We may display aggregated gender information in our products but we do not display individuals' genders.

- **Internet or Other Electronic Network Activity Information:** We disclose information about subscribers' interactions with our products to businesses from which we collect data.

- **Professional or employment-related information:** We display information about an individual's current employer, position, compensation details and other aspects of an individual's



professional and education history in our products, which are accessible by our subscribers and the subscribers of our business partners.

- **Inferences drawn to create a profile about a consumer reflecting the consumer's preferences or characteristics:** Third parties such as advertising partners may collect personal information using Cookies or other tracking technologies as disclosed in our **Cookie Notice**.