

Data Protection & Privacy Notice

Introduction

The data privacy regulations of some countries require that a person making a report containing personal data must be notified of certain collection and retention practices regarding the information submitted by that person through this service.

If you do not wish to accept the terms below, we may be unable to accept any information through this system and suggest you report this matter directly to your supervisor or manager or to a representative of the Global Human Resources, Legal or Corporate Compliance Departments, depending on the nature of the possible violation.

1. General

The State Street Speak Up Line (“Speak Up Line”) is a web and phone-based intake system provided by State Street Corporation, 1 Lincoln Street, Boston, MA 02111 USA (“State Street”) to its employees, vendors, suppliers and business partners and those of its subsidiaries (“Reporters”) for reporting suspected violations of laws or regulations, or for certain matters specifically specified in an applicable whistleblowing law.

State Street is the controller of the processing, and NAVEX is a processor acting on behalf of State Street.

You may contact State Street with any questions relating to this Notice via email at the following address:

PrivacyOffice@StateStreet.com

In certain countries, such as the United States, the Speak Up Line may also be used to report suspected violations of other matters. It and the database in which the personal data and information that you may report is stored, are operated in the United States by NAVEX.

2. Use of the Speak Up Line

Use of the Speak Up Line is entirely voluntary. You are encouraged to report possible violations directly to your supervisor or manager, or to a representative of the Global Human Resources, Legal or Corporate Compliance Departments, depending on the nature of the possible violation. If you feel that you are unable to do so, you may use the Speak Up Line to make your report.

The Speak Up Line is a confidential online reporting system that allows you to report suspected violations of law or company policies, as well as other concerns you may have, to State Street. In certain countries, State Street may only accept reports through the Speak Up Line that relate to certain matters specifically specified in an applicable

whistleblowing law. If your concern pertains to a matter that, under local law, may not be accepted by State Street through the Speak Up Line, you will need to contact your supervisor or local management or a representative of the Global Human Resources, Legal or Corporate Compliance Departments to report the matter.

Please be aware that the information you supply about yourself, your colleagues, or any aspect of the company's operations may result in decisions that affect others. Therefore, we ask that you only provide information that you believe is true. You will not be subject to retaliation from State Street for any report of a suspected violation that is made in good faith, even if it later turns out to be factually incorrect. Please be aware, however, that knowingly providing false or misleading information will not be tolerated. The information you submit will be treated confidentially except in cases where this is not possible because of legal requirements or in order to conduct an investigation, in which case the information will be handled sensitively. We encourage you to identify yourself in order for us to follow up with questions we may have.

3. What personal data and information is collected and processed?

The Speak Up Line captures the following personal data and information that you provide when you make a report:

- (i) your name and contact details (unless you report anonymously) and whether you are employed by State Street;
- (ii) the name and other personal data of the persons you name in your report if you

provide such information (i.e.: description of functions and contact details); and

- (iii) a description of the alleged misconduct as well as a description of the circumstances of the incident. Note that depending upon the laws of the country in which you are residing, the report may not be made anonymously; however, your personal information will be treated confidentially and will only be disclosed as set out below.

4. How will the personal data and information be processed after your report and who may access personal data and information?

The purpose for which your personal data, and your report, will be used will be to investigate the issues raised in your report and to take appropriate follow-up action, in accordance with applicable law.

The personal data and information you provide will be stored in a database which is located on servers hosted and operated in the United States by NAVEX. NAVEX has entered into contractual commitments with State Street to secure the information you provide in accordance with applicable law. NAVEX is committed to maintaining stringent privacy and security practices including those related to notice, choice, onward transfer, security, data integrity, access, and enforcement.

You may contact State Street with any requests relating to the use, transfer, correction, or deletion of any of your personal data stored by this service at:

PrivacyOffice@StateStreet.com

For the purpose of processing and investigating your report and subject to the provisions of local law, the personal data and information you provide may be accessed, processed and used by the relevant personnel of State Street, including Global Human Resources, Finance, Corporate Audit, Legal, Corporate Compliance, management, external advisors (e.g. legal advisors), or, in limited circumstances, by technical staff at NAVEX. Those individuals may be located in the United States, the United Kingdom or elsewhere.

Personal data and information you provide may also be disclosed to the police and/or other enforcement or regulatory authorities. The relevant bodies that receive and process personal data can be located in the US or in another country that may not provide the level of data protection available in the EU.

5. Accessing information concerning the report

State Street will promptly notify any person who is the subject of a report to the Speak Up Line except where notice needs to be delayed to ensure the integrity of the investigation and preservation of relevant information.

With some exceptions, the subject of the report may access information concerning the report (with the exception of the identity of the reporter) and request correction of personal data that is inaccurate or incomplete in accordance with applicable law. Similarly, with some exceptions, reporters may also access information about the report and request corrections of their personal data in accordance with applicable law.

6. Legal Basis for Processing

State Street uses the personal data collected from you, the reporter, and in your report, in order to comply with a legal or regulatory obligation that we have, for investigation and fraud prevention purposes, and to operate our business in a prudent manner.

7. Retention of the Report and of Your Data

Your report and your personal data will only be retained for as long as they are needed for the investigation of your allegations and for any legitimate follow-up to the investigation; they will be fully and securely destroyed or erased when and as soon as they are no longer needed for the investigation of the report, or for the purposes of legitimate follow-up to the report (including legal action). However, reports and files on the investigation of reports (or parts of such reports or files) and personal data in such reports or files may be placed in an archive if there is a clear and overriding public interest or legal interest of State Street in retaining the data, subject to such restrictions on access to the data aimed at safeguarding the rights and freedoms of the data subjects as may be allowed by applicable law.

8. Your Rights

State Street will fully support you in exercise of any rights you may have as a data subject under applicable law, i.e., your:

- right of access to your data;
- right to rectification of incorrect data;

- right to erasure of data (“right to be forgotten”);
- right to ask for restriction (“blocking”) of contested data;
- right to have third parties who received incorrect, incomplete or contested data informed of any rectifications or blocking of your data;
- right to data portability;
- right to object to processing;
- right not to be subject to automated decision-making including profiling (in fact we will not use your data or any information in your report for such decision-making).

We will only restrict any of the above rights if and to the extent that that is necessary and proportionate in order to safeguard any of the major public interests recognized in applicable law such as the protection of criminal investigations or public security, or to protect the fundamental rights and freedoms of others, including any person(s) incriminated in your report, in accordance with applicable law.

In addition to the rights listed above, you may also have the right to lodge a complaint about our processing of your personal data with the authority competent for supervising the processing of personal data (often referred to as the data protection authority) in the country where you live (if that is an EU/EEA Member State) or in the country State Street is based (if you live outside the EU/EEA).

9. Transfers of Personal Data

Your report and your details may be held on the secure servers of NAVEX located in the United States; may be transferred to NAVEX sub-processors outside the United States for service and support or translation and interpretation purposes; and may be transferred on to State Street in the United States, the United Kingdom, or India, subject to appropriate safeguards.

10. Special Country Regulations

Throughout much of the European Union and surrounding areas, reports may be limited in topics pursuant to applicable law. Further, some countries restrict reports such that only employees in key or management functions may be the subject of a report.

Any issues or concerns relating to topics not permitted by law to be reported via the Speak Up Line should be reported directly to your Manager or Supervisor or a representative of the Global Human Resources, Legal or Corporate Compliance Departments as appropriate for the subject matter of the possible violation. In some countries, anonymous reports may not be permitted under the law except under extremely restrictive circumstances.