

# European Union General Data Protection Regulation Privacy Notice

This Privacy Notice describes how Charles Schwab & Co., Inc.; Charles Schwab, U.K., Ltd.; Charles Schwab Futures, Inc.; Schwab Charitable Fund™; and Schwab Private Client Investment Advisory, Inc. (together “Schwab,” “we,” or “our”) treat personal data of individuals in the European Economic Area (EEA). The information in this Notice is provided pursuant to the European Union’s General Data Protection Regulation (GDPR) with regard to how we act as data controllers.

The authorized representative of Charles Schwab & Co., Inc.; Charles Schwab Futures, Inc.; Schwab Charitable Fund; and Schwab Private Client Investment Advisory, Inc. in the EEA is Charles Schwab, U.K., Ltd., located at 33 Ludgate Hill, London, EC4M 7JN, United Kingdom. Schwab’s Data Protection Officer can be reached at +1-407-806-5334 or SchwabGDPR@Schwab.com. Contacting Schwab through other means could impact your rights and Schwab’s obligations under the GDPR.

## Basis for and Purposes of Data Processing

We collect and process your personal data when processing is necessary for the performance of our contract with you or your designee.

Depending on the services you subscribe to, your contract is with one or more of the following Schwab entities identified in your contracts and account materials:

- Charles Schwab & Co., Inc. provides investment services and products, including Schwab brokerage accounts.
- Charles Schwab, U.K., Ltd. provides investment services and products, including Schwab brokerage accounts.
- Charles Schwab Futures, Inc. provides futures trading services.
- Schwab Charitable Fund provides clients with the resources to effectively meet their charitable giving needs through donor-advised fund accounts.
- Schwab Private Client Investment Advisory, Inc. provides wealth management advice.

We also process your personal data in order to comply with applicable U.S. laws (as we could not provide you with the required services unless we complied with U.S. laws) and when necessary for the purposes of our legitimate interests.

We also process your personal data for direct marketing purposes based on your consent. You maintain the ability to opt out of direct marketing from the Schwab entities you do business with.

## Personal Data Not Obtained From You

We obtain personal information about you from other sources, including those publicly accessible, in order to assist us in verifying your identity.

## Recipients of Personal Data

We share your personal data with affiliated entities and unaffiliated service providers to help conduct our business, and these arrangements are subject to data protection agreements.

Our service providers provide: (a) professional services, such as audit, accounting, and tax services; (b) facilitation of charitable contributions; (c) public relations, including learning and development services; (d) marketing and promotional event services; (e) market data and research; (f) network platform support services; (g) administrative services, such as printing and mailing; and (h) legal, governmental, and regulatory support.

## International Transfers

Except for Charles Schwab, U.K., Ltd., the Schwab entities listed herein are based in the U.S. (a country for which the EEA has not issued an adequacy decision on the protection of personal data). Charles Schwab, U.K., Ltd. transfers data to U.S. companies in the Schwab group as necessary for the performance of our contract with you and/or based on your consent.

## Data Storage Period

We process and store personal data for as long as is required to provide services, which is typically for the duration of our contract with you or your designee. The criteria used to determine data storage (such data will be kept confidential, unless otherwise required by law) are: our responsibilities as a financial institution to comply with regulatory, legal requirements, and corporate standards and to prevent fraud and market abuse. Data storage is also determined by our requirements to maintain cyber and information security and privacy protections, as well as data integrity and systems controls.

## Your GDPR Rights

You can exercise or address these rights (subject to data retention and other requirements under applicable law) by contacting our Data Protection Officer identified in the beginning of this Notice.

1. **Access.** You have the right to obtain access to your personal data.
2. **Rectification.** You have the right to ask for incorrect, inaccurate, or incomplete personal data of yours to be corrected.
3. **Erasure.** You have the right to request that your personal data be erased.
4. **Restriction on processing.** You have the right to request the restriction of the processing of your personal data in specific cases.
5. **Objection to processing.** You have the right to object to the processing of your personal data for marketing purposes or on grounds relating to your particular situation.
6. **Portability.** You have the right to receive your personal data in a machine-readable format and send it to another controller.
7. **Withdrawal of consent.** You have the right to withdraw consent from Schwab’s direct marketing.
8. **Lodging a complaint with a Supervisory Authority.** You have the right to lodge a complaint with a Supervisory Authority within your Member State.