

## **SS&C Technologies, Inc. Confidentiality and Privacy Policy**

In the course of conducting its business activities, SS&C Technologies, Inc. (“SS&C”) is entrusted with confidential information from its clients, business partners, and employees. Confidential information may include as sensitive business and technical information (“Confidential Business Information”) as well as private personal information (“Personal information”). SS&C is committed to maintaining the confidentiality of all such information and limiting its use of such information to that which is lawful and necessary for its business activities. This Confidentiality and Privacy (“Policy”) explains how, in its business activities, SS&C uses and safeguards Confidential Business Information and Personal Information.

### **Confidential Business Information**

For purposes of this Policy, Confidential Business Information is information that is not generally known to the public that is disclosed by SS&C’s clients to SS&C that has been identified as being proprietary or confidential or that by the nature of the circumstances surrounding the disclosure or receipt, or by the nature of the information itself, reasonably ought to be treated as proprietary and confidential. Confidential Business Information may include information regarding securities holding, trading activity, strategies, customer lists, or any information that a client has been entrusted to keep confidential such as Personal Information belonging to its customers or employees. SS&C may receive Confidential Business Information from its clients for the purpose of providing services to such clients. (Where Confidential Business Information contains Personal Information, SS&C relies on its client to ensure that if the Personal Information is disclosed to SS&C in accordance with applicable privacy laws and regulations.)

SS&C only uses Confidential Business Information only as reasonably necessary to the business conducted by SS&C. SS&C requires all of its employees (as well as independent contractors, temporary workers, and agents of SS&C that have access to SS&C’s systems) to sign written non-disclosure agreements which require that they keep confidential all such Confidential Business Information that they obtain access to in the course of their employment with or service to SS&C. SS&C employees are also subject to SS&C Code of Conduct which prohibits the unauthorized disclosure of Confidential Business Information. SS&C’s commitment to safeguard Confidential Business Information is set for in written agreements between SS&C and such clients which may set forth more detailed commitments to retain, return, or destroy Confidential Business Information.

### **Personal Information**

For purposes of this Policy, Personal Information is information capable of being associated with a particular individual about an identifiable individual. It may include information such as name, telephone number, a government issued number (e.g., a social security number, driver's license number or other state identification card number), a financial account number or credit card number, but does not include publicly available

information that is lawfully made available to the general public from federal, state or local government records or widely distributed media.

SS&C collects and uses such Personal Information and only as reasonably necessary to the business conducted by SS&C. In using and safeguarding Personal Information, SS&C is subject to all the contractual and corporate governance non-disclosure restrictions that are applicable to Confidential Business Information. In addition, with respect to Personal Information, SS&C is subject to all applicable privacy legislation.

### **Security of Confidential Business Information and Personal Information**

In furtherance of confidentiality objectives above, SS&C maintains an information security program including written policies addressing the acceptable use and access to Confidential Business Information and Personal Information which may be contained SS&C's information systems. These policies (which may be reviewed and updated from time to time) set forth in more detail the procedural and technical methods SS&C uses to restrict access and prevent unauthorized disclosures.