

Piper Sandler Companies

California Consumer Privacy Notice

Privacy Statement – California

This privacy notice for California residents supplements the information contained in the Privacy Statement of Piper Sandler Companies and its subsidiaries (collectively, “we”, “us”, or “our”) and applies to our collection and use of California residents’ personal information where such collection or use is governed by the California Consumer Privacy Act of 2018 (“CCPA”) and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this notice. This notice does not cover information that is exempted from the privacy policy notification requirements of the CCPA, including information about consumers and clients that is covered by the Gramm-Leach-Bliley Act and information processed exclusively in the context of a business person acting in a business capacity. Information about employees, contractors, and job applicants is covered in a separate notice.

Information we collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information,” subject to the exclusions described below). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months. We will also continue to collect the same categories of personal information listed in the chart above, for the same purposes. If this should change, we will issue an updated notice.

Category	Examples	Collected
A. Identifiers	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number or other similar identifiers.	Yes
B. Personal information categories listed in the California Customer Records statute (Cal. Civ Code 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, education, employment, employment history, bank account number, or any other financial information. Some personal information included in this category may overlap with other categories.	Yes
C. Protected classification characteristics under California or federal law.	Age (40 years or older), national origin, citizenship, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status.	Yes
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes
E. Biometric information.	Physiological and behavioral characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as voice prints.	Yes
F. Internet or other similar network activity.	Browsing history, search history, information on consumer’s interaction with a website, application, or advertisement.	Yes
G. Geolocation data.	Physical location or movements	Yes
H. Sensory data.	Audio, electronic, visual or similar information.	Yes
I. Professional or employment-related information.	Current or past job history.	Yes
J. Education information (excluding publicly available personally identifiable information as defined in the family Education Rights and Privacy Act (20 U.S.C. Section 123g, 34 C.F.R. Part 99)).	Information relating to a person’s education or educational history.	Yes
K. Inferences drawn from other personal information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Yes

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from CCPA’s scope, like:
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

Sources of Personal Information Collected

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us.
- Indirectly from our clients or their agents. For example, through information we collect about our clients in the course of providing services to them, when they call us, attend an event, or visit our offices.
- Directly and indirectly from activity on our website (Pershing hosted web site and PSC.com). For example, from submissions through our website portal or website usage details collected automatically.
- From third-parties that interact with us in connection with our legal obligations and the services we perform. For example, client screening for anti-money laundering compliance and review of government watch lists.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To provide you with information, products or services that you have requested from us.
- To provide you with email alerts, event registrations and other notices concerning our products or services, or events or news, that may be of interest to you.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collections.
- To improve our website and present its contents to you.
- For testing, research, analysis and service improvement.
- As necessary or appropriate to prevent crime, protect the rights, property or safety of, our clients or others.
- As necessary or appropriate to protecting our systems and networks from unauthorized access and attacks, securing our facilities and personnel.
- To respond to law enforcement or regulatory requests and as required by applicable law, regulation, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, in which personal information held by us is among the assets considered.

We will not collect additional categories of personal information or use the personal information we collected for additional purposes without providing you notice.

Sharing Personal Information

We may disclose your information to a third party for a business purpose.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for business purposes:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Protected classification characteristics under California or federal law.
- Category D: Commercial information.
- Category E: Biometric information.
- Category F: Internet or other similar network activity.
- Category G: Geolocation data.
- Category H: Sensory data.
- Category I: Professional or employment-related information.
- Category J: Education information.
- Category K: Inferences drawn from other personal information.

We disclose personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products and services we provide to you
- Governmental entities, self-regulatory associations

In addition, we may disclose personal information to other third parties in response to valid legal requests or to defend a complaint or allegation, and to any person to whom we transfer any of our rights or obligations under any agreement, or in connection with a sale, merger or consolidation of our business or other transfer of our assets, whether voluntarily or by operation of law, or who is otherwise deemed to be our successor or transferee

We do not sell personal information and, in the preceding twelve (12) months, we have not sold any personal information.

Your Rights and Choices

The CCPA provides consumers (California residents) specific rights regarding their personal information. Much of the personal information we maintain is exempted from the CCPA's access and deletion rights, as described above. This section therefore describes rights you may have under the CCPA and explains how to exercise those rights to the extent your personal information is covered by the CCPA.

Access to Specific Information

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purposes for collecting that personal information.
- The categories of third parties with which we share that personal information.
- The categories of personal information that we have shared with third parties for business or commercial purposes.
- The specific pieces of personal information we collected about you.

Our responses to any of these requests will cover the 12-month period preceding our receipt of the request.

Deletion Request Rights

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronics Communications Privacy Act (Cal. Penal Code 1546 seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it

Exercising Access and Deletion Rights

To exercise access and deletion rights described above, please submit a verifiable consumer request to us by either:

Calling us at 612-303-6930 or 877-337-4737

Visit PiperSandler.com

You may also designate an authorized agent to submit requests on your behalf. If you do so, you will be required to verify your identity by providing us with certain personal information as described below. Additionally, we will also require that you provide the agent with written permission to act on your behalf, and we will deny the request if the agent is unable to submit proof to us that you have authorized them to act on your behalf. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request to access your personal information twice with a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Requests for Household Information

There may be some types of Personal Information that can be associated with a household (a group of people living together in a single home). Requests for access and deletion of household personal information must be made by each member of the household. We will verify each member of the household using the verification process explained above. If we are unable to verify the identity of each household member with the degree of certainty required, we will not be able to respond to the request. We will notify you to explain the basis of our denial.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will seek to inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. If we cannot comply with a request, we will endeavor to explain the reasons why. For access requests, we will seek to provide your personal information in a format that is useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you good or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level of quality of goods or services.

Personal Information of Minors

The CCPA has specific rules regarding the use of personal information from consumers under 16 years of age. We do not sell the personal information of minors under 16.

Accessibility

We are committed to ensuring that our communications are accessible to individuals with disabilities. Individuals with disabilities can access this policy in alternative formats by contacting us at the address, phone, or email address below. This website is designed to meet content accessibility guidelines. To submit accessibility-related requests or report barriers to accessibility, please contact us at one of the contacts listed below.

Changes to Our Privacy Notice

This privacy notice may be amended or updated from time to time to reflect changes in our practices with respect to the processing of your personal information, or changes in applicable law. We encourage you to read this notice carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this notice.

Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 612-303-6930 or 877-337-4737

Website: PiperSandler.com

Email: Services.Account@psc.com

Postal Address:

Piper Sandler
Attn: Account Service J12SOP
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Minneapolis MN 55402