

FACTS**WHAT DOES ROYAL BANK OF CANADA, ACTING THROUGH ITS NEW YORK BRANCH (THE “NEW YORK BRANCH”), DO WITH YOUR PERSONAL INFORMATION?****Why?**

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- Account balances and payment history
- Credit history and credit scores

How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons the New York Branch chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does the New York Branch share?	Can you limit this sharing?
For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes — to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes — information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes — information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For non-affiliates to market to you	No	We don't share

To limit our sharing

- Mail the form below

Please note:

If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

Questions?

Call your Credit Operations Support team at (833) 656-5722.

Mail-in Form

Mark any/all you want to limit:

- Do not share information about my creditworthiness with your affiliates for their everyday business purposes.
- Do not allow your affiliates to use my personal information to market to me.

Name

Address

City, State, Zip

Account #

Please mail to:

Royal Bank of Canada
250 Nicollet Mall Ste. 1400
Attention: Credit Operations
Minneapolis, MN 55401



Who we are	
Who is providing this notice?	Royal Bank of Canada, acting through its New York Branch located at 1211 Avenue of the Americas, Suite 3300, New York, NY 10036.
What we do	
How does the New York Branch protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards, secured files and buildings.
How does the New York Branch collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> ▪ open an account ▪ apply for a loan We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> ▪ sharing for affiliates' everyday business purposes – information about your creditworthiness ▪ affiliates from using your information to market to you ▪ sharing for non-affiliates to market to you State laws and individual companies may give you additional rights to limit sharing. [See below for more on your rights under state law.]
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. Our affiliates include: <ul style="list-style-type: none"> ▪ <i>Companies with an RBC name, such as Royal Bank of Canada; RBC Wealth Management; RBC Capital Markets, LLC; and RBC Bank (Georgia), N.A.</i> ▪ <i>Companies with a City National name, such as City National Bank; City National Securities, Inc.; and City National Rochdale, LLC.</i> ▪ <i>Symphonic Financial Advisors, LLC; RIM - Securities, LLC; Symphonic Securities, LLC; Datafaction, Inc.; Symphonic Insurance, LLC; LMCG Investments, LLC; Convergent Wealth Advisors, LLC; and Mid-Continent Capital, LLC.</i>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ▪ <i>New York Branch does not share with nonaffiliates to market to you.</i>
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ▪ <i>New York Branch does not jointly market.</i>
Other important information	
<p>The information-sharing practices described above are in accordance with federal law and similar state laws. The laws of Vermont and California place additional limits on sharing information about their residents.</p> <p>For customers with Vermont mailing address, we will obtain your consent before sharing your “creditworthiness” information, as described above, with other RBC companies. We will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures.</p> <p>For customers with California mailing addresses, we will limit any sharing of your non-public personal information as required by California law. For more information, please see our <i>California Privacy Notice</i>.</p>	

California Privacy Notice

This CALIFORNIA PRIVACY NOTICE supplements the information contained in the Privacy Statement of RBC, acting through its New York Branch (“we”, “us”, “our”) and applies solely to the rights of California residents with respect to “Personal Information” as defined in the California Consumer Privacy Act (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”). Any capitalized terms used in this policy have the same meaning as in the CCPA unless otherwise defined.

Personal Information We Collect

As used in this California Privacy Notice, “personal information” means any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal information does not include: (i) publicly available information from government records; (ii) de-identified or aggregated consumer information; or

(iii) personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA) and the Gramm-Leach-Bliley Act (GLBA). As a financial institution, the vast majority of the information we collect is subject to the privacy provisions of GLBA or falls within another exception listed above, and is therefore not subject to the disclosure provisions of CCPA. However, we are including below all such information that we collect in the interest of full disclosure.

We have collected the following categories of personal information from consumers within the preceding twelve (12) months:

A. Identifiers such as 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.

Source- We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries or public records.

Business purpose for collection - We collect this data to market to clients and potential clients and service existing clients, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, preventing fraud, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services.

Parties with whom information was shared - We share this information with service providers so that they can process information on our behalf. We also share this information with affiliates for marketing purposes, and with governmental entities.

Retention – New York Branch will not retain Personal Information longer than necessary to accomplish the business purpose for which the Personal Information was collected and processed or as required by the terms of a client contract or applicable law.

B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) **such as** name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.

Source - We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries or public records.

Business purpose for collection - We collect this data to market to clients and potential clients and service existing clients, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, preventing fraud, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services.

Parties with whom information was shared - We share this information with service providers so that they can process information on our behalf. We also share this information with affiliates for marketing purposes, and with governmental entities.

Retention – New York Branch will not retain Personal Information longer than necessary to accomplish the business purpose for which the Personal Information was collected and processed or as required by the terms of a client contract or applicable law.

C. Protected classification characteristics under California or federal law such as age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).

Source - We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries or public records.

Business purpose for collection - We collect this data to market to clients and potential clients and service existing clients, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, preventing fraud, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services.

Parties with whom information was shared - We share this information with service providers so that they can process information on our behalf. We also share this information with affiliates for marketing purposes, and with governmental entities.

Retention – New York Branch will not retain Personal Information longer than necessary to accomplish the business purpose for which the Personal Information was collected and processed or as required by the terms of a client contract or applicable law.

D. Commercial information, including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

Source - We collect this data from the consumer, the consumer's transactions within an account, counterparties to these transactions, and from government agencies, registries or public records.

Business purpose for collection - We collect this data to comply with applicable law, market to clients and service clients, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, preventing fraud, processing payments, providing advertising or marketing services, or providing similar services.

Parties with whom information was shared - We share this information with service providers so that they can process information on our behalf. We also share this information with affiliates for marketing purposes, and with governmental entities.

Retention – New York Branch will not retain Personal Information longer than necessary to accomplish the business purpose for which the Personal Information was collected and processed or as required by the terms of a client contract or applicable law.

E. Internet or other electronic network activity information, including, but not limited to, browsing history, search history, and information regarding a consumer's interaction with an Internet Web site, application,

or advertisement.

Source - We collect this data from reviewing the consumer's electronic browsing history on our website.

Business purpose for collection - We collect this data to market to clients, provide advertising or marketing services, or similar services, and prevent fraud.

Parties with whom information was shared - We share this information with service providers so that they can process information on our behalf.

Retention – New York Branch will not retain Personal Information longer than necessary to accomplish the business purpose for which the Personal Information was collected and processed or as required by the terms of a client contract or applicable law.

F. Geolocation data.

Source - We collect this data from reviewing the geolocation data revealed when a consumer accesses our website.

Business purpose for collection - We collect this data to market to clients, provide advertising or marketing services, or similar services, and prevent fraud.

Parties with whom information was shared - We share this information with service providers so that they can process information on our behalf.

Retention – New York Branch will not retain Personal Information longer than necessary to accomplish the business purpose for which the Personal Information was collected and processed or as required by the terms of a client contract or applicable law.

G. Professional or employment-related information.

Source - In compliance with any applicable notice requirements, we may record phone calls.

Business purpose for collection - We collect this data to service existing clients, including maintaining or servicing accounts, providing advertising or marketing services, providing analytic services, or providing similar services.

Parties with whom information was shared - We share this information with service providers so that they can process information on our behalf.

Retention – New York Branch will not retain Personal Information longer than necessary to accomplish the business purpose for which the Personal Information was collected and processed or as required by the terms of a client contract or applicable law.

H. Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, 34 C.F.R. Part 99).

Source - We collect this data from the consumer.

Business purpose for collection - We collect this data to service existing clients, including maintaining or servicing accounts, providing advertising or marketing services, providing analytic services, or providing similar services.

Parties with whom information was shared - We share this information with service providers so that they can process information on our behalf.

Retention – New York Branch will not retain Personal Information longer than necessary to accomplish the business purpose for which the Personal Information was collected and processed or as required by the terms of a client contract or applicable law.

I. Sensitive Personal Information (“SPI”) such as government-issued identifiers, account credentials, financial information, precise geolocation, race or ethnic origin, religious beliefs, contents of certain types of messages, genetic data, biometric information; and other types of information.

Source - We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries, or public records.

Business purpose for collection - We collect this data to market to clients and potential clients and service existing clients, including maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying customer information, preventing fraud, processing payments, providing advertising or marketing services, providing analytic services, or providing similar services.

Parties with whom information was shared - We share this information with service providers so that they can process information on our behalf. We also share this information with affiliates for marketing purposes, and with governmental entities.

Retention - New York Branch will not retain Personal Information longer than necessary to accomplish the business purpose for which the Personal Information was collected and processed or as required by the terms of a client contract or applicable law.

New York Branch does not share Sensitive Personal Information for purposes of cross-context behavioral advertising.

J. Inferences drawn from any of the above information to create a profile about a consumer reflecting the consumer’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Source - We collect this data from the consumer, third party verification services, commercially available sources such as mailing list providers; and publicly available sources such as telephone directories, newspapers, social media or internet sites, and from government agencies, registries, or public records.

Business purpose for collection - We collect this data to market to clients and potential clients, providing advertising or marketing services, providing analytic services, or providing similar services.

Parties with whom information was shared - We share this information with service providers so that they can process information on our behalf.

Retention – New York Branch will not retain Personal Information longer than necessary to accomplish the business purpose for which the Personal Information was collected and processed or as required by the terms of a client contract or applicable law.

Personal Information We Sell

We do not sell personal information and have not sold consumer’s personal information in the preceding twelve (12) months.

Consumer Rights under CCPA

The CCPA provides Consumers with certain rights regarding their Personal Information. If you are a Consumer (hereafter “you” or “your” refers to a Consumer), this notice describes your CCPA rights and explains how to exercise your rights.

Right to Access

You have the right to request, up to 2 times every 12 months, that we disclose to you the following:

The categories of personal information we have collected about you.

The categories of sources from which such personal information is collected. The business or commercial purpose for collecting your personal information.

The categories of personal information about you disclosed for a business purpose during the last 12 months and the categories of third parties to whom such personal information was disclosed.

The specific pieces of personal information we have collected about you. You have the right to request a portable copy of your Personal Information.

We will disclose the applicable information specified above to you upon receipt of your verifiable consumer request. **See “Submitting a Verifiable Consumer Request” section below.**

Right to Correction

You have the right to request that we correct information that is inaccurate. **See “Submitting a Verifiable Consumer Request” section below.**

Right to Deletion

You have the right to request that we delete any personal information about you which we have collected from you, subject to certain exceptions allowed under applicable law. **See “Submitting a Verifiable Consumer Request” section below.**

Submitting a Verifiable Consumer Request - How to Exercise Rights of Disclosure, Correction, or Deletion

We are required to provide the information specified above to you, or to correct or delete information in response to your request, only upon receipt of a verifiable consumer request. Your request must provide information to us that enables us to verify your identity (and, as applicable, of your authorized representative) in order for us to respond to your request. Upon receiving a request pursuant to this Policy, we will confirm receipt within 10 days and provide you with information about how we will verify and process the request. We will take reasonable steps to verify your identity (or the identity and authority of your authorized representative) prior to responding to your requests under CCPA. You agree to respond to reasonable requests by us for additional information to enable us to verify your identity in connection with your requests for information or deletion of information under the CCPA.

You may submit a verifiable consumer request after January 1, 2020 by

Contacting us by telephone at 844-937-2296 between 8:00 a.m. and 4:30 p.m. Central Time.

Completing a request form at: <https://www.rbcwealthmanagement.com/us/en/legal/rbc-credit-access-line>

Once your request is verified, we will promptly take steps to disclose and deliver, free of charge to you, the personal information required by the CCPA. We will deliver the information to you by mail or electronically within 45 days of receipt of your request, or such additional time as may be permitted under the CCPA.

Right to Nondiscrimination

We will not discriminate against you because you elect to exercise any of your rights under the CCPA including, but is not limited to:

Denying goods or services to you.

Charging you different prices or rates for goods or services, including through the use of discounts or other benefits or imposing penalties on you.

Providing a different level or quality of goods or services you.

Suggesting that you will receive a different price or rate for goods or services or a different level or quality of goods or services.

None of the foregoing, however, prohibits us from charging you a different price or rate, or from providing a different level or quality of goods or services to you, if that difference is reasonably related to the value provided to us by your data.

Personal Information of Children

We do not knowingly collect information from children under the age of 16. Our website is not directed or intended to individuals under the age of 16 and should not be used by individuals under the age of 16. In no event should individuals under the age of 16 provide any Personal Information through our website.

Security of Personal Information

We seek to protect Personal Information by implementing and maintaining reasonable physical, electronic, and procedural security measures and safeguards designed to protect Personal Information within our organization. We provide employee training in the proper handling of Personal Information.

Updates

This California Privacy Notice was last updated on December 15, 2022. We may modify this California Privacy Notice at any time. For questions concerning our privacy policies and practices, you may contact us by telephone at 844-937-2296 between 8:00 a.m. and 4:30 p.m. Central Time.