

GLOBAL ONLINE PRIVACY STATEMENT

Last Updated: December 15, 2021

PGIM, Inc. and its affiliates comprising Prudential's global investment management businesses (together, "PGIM," "we" or "us") respect your privacy, and we are committed to protecting it. We provide this Privacy Statement to tell you how we may collect, use, share, and retain information about you and your choices.

Websites Covered by This Privacy Statement

This Privacy Statement describes our practices in connection with information that we collect through PGIM.com and other websites operated by us from which you are accessing this Privacy Statement (the "Websites").

The Privacy Statement does not apply to those websites or communications that have their own privacy statements or to websites of other companies or entities that are linked to this website. See "Third Party Websites" below. To learn about the privacy policy of a linked site, please refer to the privacy statement for that site.

Personal Information

We may ask you to provide certain Personal Information, which is information that identifies an individual or relates to an identifiable individual, including: name, postal address, telephone number and email address.

We and our service providers collect Personal Information about you in a variety of ways, including:

- **Through the Websites.** For example, you may provide us with your name, address, email address, and telephone number when you request that a PGIM representative contact you, or when you fill out a survey or form, when you sign up for a newsletter.
- **From Other Sources.** We receive your Personal Information from other sources, such as publicly available databases and joint marketing partners when they share the information with us.

We need to collect Personal Information to provide services to you. If you do not provide the information requested, we may not be able to provide the services. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the Websites, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Statement.

How We Use Personal Information

We and our service providers use Personal Information for business purposes including:

- **Providing the functionality of the Websites and fulfilling our customers' requests.**
 - To respond to inquiries and fulfill requests from our customers, administer their account(s) and manage our relationships; and
 - To verify an individual's identity and/or location (or the identity or location of your representative or agent) in order to allow access to your accounts; or conduct online transactions.

We will engage in these activities to manage our contractual relationship with our customers and/or to comply with a legal obligation.

- **Providing our customers with our newsletter and/or other marketing materials and facilitating social sharing.**
 - To inform our customers about products or services which we believe may be of interest, including tailored ads or offers.

We will engage in this activity because we have a legitimate interest or with your consent.

- **Accomplishing our business purposes.**
 - For business purposes, including data analysis, audits, developing and improving products and services, identifying usage trends and determining the effectiveness of promotional campaigns, and enhancing, improving or modifying our services or Websites;
 - To contact individuals in connection with existing transactions and contractual agreements;
 - For risk management, for fraud detection and prevention, including "know your customer", anti-money laundering, due diligence requirements, credit checks, compliance with sanction rules, anti-bribery and gift giving policies, fraud monitoring, and tax reporting;
 - To comply with laws and regulations (including any legal or regulatory guidance, codes or opinions), and to comply with other legal process and law enforcement requirements;
 - To protect the security of accounts and Personal Information; and
 - To send administrative information to you, such as changes to our terms, conditions and policies.

We engage in these activities to manage our contractual relationship with our customers, to comply with a legal obligation, and/or because we have a legitimate interest.

How We Disclose Personal Information

We disclose Personal Information to:

- The appropriate PGIM organization or affiliate so it can respond to your request

- Third parties as permitted or required by law, for example:
 - Regulators
 - Vendors that provide service to us
 - Law enforcement authorities

How We Protect Your Information

We disclose Personal Information:

- **A listing of our affiliates can be provided by your client services representative.**
- **To our third-party service providers, to facilitate services they provide to us.**
 - These can include providers of services such as website hosting, data analysis, information technology and related infrastructure provision, customer service, email delivery, auditing, and other services.

Other Uses and Disclosures of Personal Information

We also use and disclose Personal Information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- **To comply with applicable law and regulations.**
 - This can include laws outside your country of residence.
- **To cooperate with public and government authorities.**
 - To respond to a request or to provide information we believe is important
 - These can include authorities outside your country of residence.
- **To cooperate with law enforcement.**
 - For example, when we respond to law enforcement requests and orders or provide information we believe is important.
- **For other legal reasons.**
 - To enforce our terms and conditions; and
 - To protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
- **In connection with a sale or business transaction.** We have a legitimate interest in disclosing or transferring Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings) *Such third parties may include, for example, an acquiring entity and its advisors.*

Other Information

We also collect Other Information about users of the Websites, which is any information that does not reveal a person's specific identity or does not directly relate to an identifiable individual.

The kind of information we collect includes:

- The number of visitors to our site
- The pages visited on our site
- The features used
- How long a visitor stays
- The domain name of the site from which visitors connect to our site
- Browser and device information
- Information collected through cookies, pixel tags, and other technologies
- Information that has been aggregated in a manner such that it no longer reveals your identity

We and our service providers may collect Other Information in a variety of ways, including: through a browser or device; using cookies and other similar technologies, and through IP addresses. Please see our Cookies Policy [here](#) for more information.

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. If we are required to treat Other Information as Personal Information under applicable law, then we may use and disclose it for the purposes for which we use and disclose Personal Information as detailed in this Statement. In some instances, we may combine Other Information with Personal Information. If we do, we will treat the combined information as Personal Information as long as it is combined.

How We Protect Your Information

PGIM seeks to use reasonable administrative, technical, and physical safeguards and other security measures necessary to protect Personal Information within our organization from the growing threats. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “*Contact Us*” section below.

PGIM Privacy Protection Policy

PGIM collects Social Security numbers in the course of its business activities. PGIM has a privacy policy that protects personal information, including Social Security numbers. This policy is as follows:

PGIM requires that all personal information about its customers and employees, and employees of our vendors and business partners, must be kept secure and confidential. Access to personal information must be limited to employees who need the information or access to it to perform their job responsibilities. Employees may not access or disclose personal information for any purpose except as authorized for PGIM’s business purposes.

Sensitive Information

Unless specifically requested, we ask that you not send us, and you not disclose, any other sensitive Personal Information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Websites.

Accessing, Changing or Deleting Personal Information

If you would like to request to review, correct, update, suppress, restrict or delete, or object to the processing of Personal Information that you have previously provided to us, or if you would like to request to receive an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact us by sending an e-mail to pgim.privacy@pgim.com or write to us at the following address: 655 Broad Street, Newark, NJ, 07102 Mail Stop: 08-19-70. We will respond to your request consistent with applicable law.

Retention Period

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with our customer and provide the Websites
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of certain transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

Third-Party Websites

This Privacy Statement does not address, and we are not responsible for, the privacy, information or other practices of any third parties, including any third party operating any website or service to which the Websites link. The inclusion of a link on the Websites does not imply endorsement of the linked site or service by us or by our affiliates.

Cross-Border Transfer

Personal information may be stored and processed in any country where PGIM has facilities or in which we engage service providers, and if you provide Personal Information to us you understand that the information will be transferred to countries outside your country of residence, including the United States, which may have different data protection rules than those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access the Personal Information.

ADDITIONAL INFORMATION REGARDING THE EEA: Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards ([the full list of these countries is available here](#)). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures, such as standard contractual clauses adopted by the

European Commission to protect Personal Information. You may obtain a copy of these measures by contacting https://ec.europa.eu/info/about-european-commission/contact_en or by following this link: https://ec.europa.eu/commission/priorities/justice-and-fundamental-rights/data-protection/2018-reform-eu-data-protection-rules_en

Children's Online Privacy

This website is not directed toward individuals under the age of eighteen (18) and we do not knowingly collect or post Personal Information from children under the age of 18.

Effective Date

This privacy statement is effective as of the "LAST UPDATED" legend above. We reserve the right to change this statement. If we change it, we will post the current privacy statement on this page. Any changes to this statement will be effective as of the day they are posted. Use of the Websites following these changes signifies acceptance of the revised Privacy Statement.

Contact Us

PGIM Inc. located at the address below is the company responsible for the collection, use, and disclosure of your Personal Information under this Privacy Statement.

If you have any questions about this Privacy Policy, please email us at pgim.privacy@pgim.com with your questions or comments or write to us at the following address: 655 Broad Street, Newark, NJ, 07102 Mail Stop: 08-19-70. We will respond to your request in accordance with applicable law.

Cookies & Similar Technologies Statement

This Cookies & Similar Technologies Statement ("CST Statement") describes the different types of cookies and similar technologies that are used on www.pgim.com (the "Website"). We may change this CST Statement at any time. Any changes in this CST Statement will become effective when we make the revised CST Statement available on or through the Website.

What Are Cookies and Similar Technologies?

Cookies are a standard feature of websites that allow us to store small amounts of data on your computer about your visit to the Website. Cookies help us learn which areas of the Website are useful and which areas need improvement. For this purpose, we may also use technologies similar to cookies, such as Flash Local Shared Objects (also known as Flash cookies) or pixel tags.

You can choose whether to accept the use of cookies and similar technologies in general by changing the settings on your browser. However, if you disable cookies and similar

technologies, your experience on the Website may be diminished and some features may not work as intended.

What Cookies and Similar Technologies Do We Use?

Below we list the different types of cookies and similar technologies that are used on the Website. To the extent any personal information is collected through cookies, our **Privacy Statement** applies and complements this CST Statement. A session cookie is used to identify a particular visit to the Website. These cookies expire after a short time, or when you close your web browser after using the Website. A persistent cookie will remain on your devices for a set period of time.

Essential Cookies. Essential cookies enable you to navigate the Website and to use its services and features. Without these absolutely necessary cookies, the Website will not perform as smoothly for you as we would like it to, and we may not be able to provide the Website or certain services or features.

Cookie Name	Description	Persistent or Session	1st or 3rd Party
AWSALB	Allocates server traffic to determine which server currently has the best availability.	Persistent	1st Party
AWSALBCORS	Stickiness cookie associated with Cross-Origin Resource Sharing use cases	Persistent	3rd Party
cookie-disclaimer	Used to store information that the user has seen the cookie disclaimer	Persistent	1st Party
AWSALB	Allocates server traffic to determine which server currently has the best availability.	Persistent	3rd Party
JSESSIONID	Used to identify the HttpSession object in further requests from client.	Session	3rd Party
cerosdomaintracking	Directs Web browsers to allow cookie sharing only between Web sites in the same DNS domain	Persistent	1st Party
cerosexperiencetracking	Directs Web browsers to allow cookie sharing only between Web sites in the same DNS domain	Persistent	1st Party
dtCookie	Session cookie used to identify user sessions	Session	3rd Party
dtLatC	Measures server latency for performance monitoring	Session	3rd Party
dtPC	Page context cookie used to link web requests to user actions	Session	3rd Party

dtSa	This cookie is used to save action names across pages so that performance can be monitored across pages.	Session	3rd Party
Limelight_HTML_Player_UserId	Assists in helping visitors view videos on the website	Persistent	3rd Party
rxVisitor	This cookie is used to store an anonymous ID for the user to correlate across sessions on the world service	Session	3rd Party
rxvt	This cookie is used to store two timestamps to determine session length and the end of a session	Session	3rd Party

Preference Cookies. Preference cookies collect information about your choices and preferences and allow us to remember language or other local settings and customize the Website accordingly.

Cookie Name	Description	Persistent or Session	1st or 3rd Party
ELOQUA	Allows visitor tracking without affecting the page load time of visitors	Persistent	3rd Party
ELQSTATUS	Allows visitor tracking without affecting the page load time of visitors	Persistent	3rd Party
SAMESITESET	Oracle cookie that delivers online marketing services	Persistent	1st Party

Social Media Cookies. Social media cookies are used when you share information using social media and they collect information about social media usage.

Cookie Name	Description	Persistent or Session	1st or 3rd Party
bscookie	A secure browser ID cookie used by LinkedIn's follow feature	Persistent	3rd Party
bcookie	This cookie is used by LinkedIn for identifying the Browser ID. It is set from LinkedIn share buttons and ad tags.	Persistent	3rd Party
lang	Session-based cookie used for Sign-in with LinkedIn and/or for LinkedIn follow feature	Persistent	3rd Party
UserMatchHistoryorder	Used to track visitors on multiple websites, in order to present relevant advertisement based on the visitor's preferences.	Persistent	3rd Party

Analytics Cookies. Analytics cookies collect information about your use of the Website and enable us to improve the way it works. For example, analytics cookies show us which are the most frequently visited pages on the Website, help us record any difficulties you have with the Website, and show us whether our advertising is effective or not. This allows us to see the overall patterns of usage on the Website, rather than the usage of a single person. We use the information to analyze Website traffic, but we do not examine this information for individually identifying information.

Cookie Name	Description	Persistent or Session	1st or 3rd Party
AMCVS_XXXXXAdobeOrg	This is a pattern type cookie name associated with Adobe Marketing Cloud. It stores a unique visitor identifier and uses an organization identifier.	Persistent	3rd Party
analyticsAuth	Stores whether the user has logged in to a prudential site	Session	1st Party
demdex	Helps Adobe Audience Manager perform functions, such as visitor identification, ID synchronization, segmentation, modeling, reporting	Persistent	3rd Party
dmdbase_cdc	This cookie is used to pass only the company name and firmographic attributes of a site visitor into analytics based on the source IP address. It is set using JavaScript.	Session	1st Party
dpm	Used to analyze visitors across domains	Persistent	3rd Party
ev_sync_dd	Used to analyze visitors across domains	Persistent	3rd Party
everest_g_v2	Used to analyze visitors across domains	Persistent	3rd Party
everest_session_v2	Used to analyze visitors across domains	Persistent	3rd Party
gpv_pn	Used to determine the previous page in the visit	Session	1st Party
s_cc	Adobe Site Catalyst cookie, determines whether cookies are enabled in the browser	Session	1st Party
s_dfa	Adobe Site Catalyst cookie used to track impression and clicks	Persistent	1st Party
s_getNewRepeat	Adobe Site Catalyst cookie, determines whether a visitor is a new visitor or a repeat visitor, and captures this information in a Analytics variable	Session	1st Party
s_ppv	Adobe Site Catalyst cookie, measures a visitor's scroll activity to see how much of a page the visitor viewed before moving on to another page	Session	1st Party

s_ppvl	Adobe Site Catalyst cookie; stores information on the percentage of the page displayed to you	Session	1st Party
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Advertising Cookies. Advertising cookies are set to display targeted promotions or advertisements based upon your interests on the Website or to manage our advertising. These cookies collect information about your activities on the Website and other sites to provide you with targeted advertising.

Cookie Name	Description	Persistent or Session	1st or 3rd Party
_gcl_au	Used to understand user interaction with the website.	Persistent	1st Party
APID	This cookie carries out information about how the end user uses the website and any advertising that the end user may have seen before visiting the website	Persistent	3rd Party
APIDTS	Collects data on visitors' preferences and behavior on the website. This information is used make content and advertisement more relevant to the specific visitor.	Persistent	3rd Party
B	Collects anonymous data related to the user's website visits, such as the number of visits, average time spent on the website and what pages have been loaded. The registered data is used to categorize the users' interest and demographical profiles with the purpose of customizing the website content depending on the visitor	Persistent	3rd Party
bkdc	Bluekai cookie; set to register anonymized user as well as aggregate anonymous activities to enable marketers to provide more targeted online advertising.	Persistent	3rd Party
bku	Bluekai cookie; set to register anonymized user as well as aggregate anonymous activities to enable marketers to provide more targeted online advertising.	Persistent	3rd Party
BKUT	Eloqua cookie that assists in delivering online marketing services	Persistent	3rd Party
IDE	Used to show personalized advertisements (ads) based on previous visits to the website.	Persistent	3rd Party
IDSYNC	Used to identify the visitor across visits and devices. This allows the website to present the visitor with relevant advertisement	Persistent	3rd Party

mt_misc	Holds attributes about the browser for fraud prevention and other technical optimizations.	Persistent	3rd Party
mt_mop	Synchronize the visitor ID with a limited number of trusted exchanges and data partners.	Persistent	3rd Party
mmapi.p.bid	Stores information on the experience of users and collect data about them for advertising purposes.	Persistent	1st Party
mmapi.p.pd	Stores customer profile information: anonymous visitor id, historical visitor profile (generated experiences and tracked actions).	Persistent	1st Party
mmapi.p.srv	Maxymiser Content Generator service node name.	Persistent	1st Party
uuidc	Collects data on the user's visits to the website, such as what pages have been loaded. The registered data is used for targeted ads.	Persistent	3rd Party
uuid	Used to optimize ad relevance by collecting visitor data from multiple websites – this exchange of visitor data is normally provided by a third-party data-center or ad-exchange.	Persistent	3rd Party
UserMatchHistory	Tracks visitors so that more relevant ads can be presented based on the visitor's preferences.	Persistent	3rd Party

Adobe Analytics. We use Adobe Analytics, which uses cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. This service may also collect information regarding the use of other websites, apps and online resources. You can learn about Adobe's practices by going to: https://marketing.adobe.com/resources/help/en_US/sc/implement/opt_out.html and opt out of them by downloading the Adobe Analytics opt-out browser add-on, available at <https://www.adobe.com/privacy/opt-out.html>

Pixel tags. Pixel tags (also known as web beacons and clear GIFs) are used to, among other things, track the actions of users of the Website, measure the success of our marketing campaigns, and compile statistics about usage of the Website and response rates.

Browser or Device Information. Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Mac), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version, and the name and version of the Website you are using. We use this information to ensure that the Website functions properly.

Physical Location. We collect the physical location of your device by, for example, using satellite, cell phone tower, or Wi-Fi signals. We use your device's physical location to provide you with personalized location-based services and content. We also share your device's physical location, combined with information about what advertisements you viewed and other information we collect, with our marketing partners to enable them to provide you with more personalized content and to study the effectiveness of advertising

campaigns. In some instances, you can allow or deny such uses and sharing of your device's location, but if you do, we and our marketing partners may not be able to provide you with the applicable personalized services and content.

Device Fingerprinting. In order to be able to offer you content that we believe may interest you based on your activity on the Website, and for fraud prevention and authentication purposes, we may also use other technologies that are similar to cookies. For example, we may gather device attributes and combine information collected by most browsers or automatically through your device to create a unique ID that identifies your browser or device to us with reasonable certainty. In this context we may collect, use, and combine the following information:

- Number of visits
- Last visit
- First visit
- External IP address
- Internal IP address
- Screen resolution
- Geolocation (latitude/longitude based on IP address)
- Device performance benchmark
- Device bandwidth benchmark
- Device user-agent (browser type, version)
- Device capabilities (Modernizer string for browser capabilities)
- Device operating system
- Device plugins installed
- Browser language
- Flash enabled or disabled
- Device time on file
- Keywords used if coming from search engine
- Pages visited
- Length of visit
- Referral page
- Mouse cursor position
- Mouse clicks
- Page scroll position

How Do I Manage Cookies and Similar Technologies?

In addition, you can refuse or accept cookies from the Website at any time by activating the settings on your browser. Information about the procedure to follow in order to enable or disable cookies can be found on your Internet browser provider's website via your help screen. Please refer to <http://www.allaboutcookies.org/manage-cookies/index.html> for information on commonly used browsers. Please be aware that if cookies are disabled, not all features of the Website may operate as intended.

Please note that this will not fully remove the cookies that have already been set on your device. You can delete cookies that have already been placed on your device by following these instructions:

- [Deleting cookies in Internet Explorer](#)
- [Deleting cookies in Firefox](#)
- [Deleting cookies in Chrome](#)
- [Deleting cookies in Opera](#)
- [Deleting cookies in Safari](#)

To find information relating to other browsers, visit the browser developer's website. Please be aware that if cookies are disabled, not all features of the Website may operate as intended. Please contact us at pgim.privacy@pgim.com if you have any questions or concerns.

If you want to clear all cookies left behind by the websites you have visited, here are links where you can download three programs that clean out tracking cookies:

- http://www.lavasoftusa.com/products/ad-aware_se_personal.php
- <http://www.spybot.info/en/download/index.html>
- <http://www.webroot.com/consumer/products/spysweeper/>