

LAST UPDATE: SEPTEMBER 2022

PGIM GLOBAL ONLINE PRIVACY STATEMENT

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 solely 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"), as well as the social media pages that we control from which you are accessing this Privacy Statement (the "Social Media Pages") (together with the Websites, the "Services").

The Privacy Statement does not apply to other websites, platforms or activities that have their own privacy statements. For example, it does not apply to personal information which we collect in providing services to institutional investors and customers, which is covered in our separate PGIM Institutional Privacy Notice. We also have separate privacy policies for California residents and certain job applicants to our European affiliates and operations. Please refer to our online [Privacy Center](#) for more information about these other notices and the types of activities they cover.

This Privacy Statement also does not apply to websites of other companies or entities that are linked to the Services. See "Third-Party Websites" below for more information. To learn about the privacy policy of a linked site, please refer to the privacy statement for that site.

PERSONAL INFORMATION

"**Personal Information**" is information that identifies an individual or relates to an identifiable individual. The Services collect Personal Information including name, postal address, telephone number, and email address. You can find more information about the types of Personal Information we collect and use in the "How We Use Your Personal Information" section below.

HOW WE COLLECT PERSONAL INFORMATION

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

- **Through the Services.** For example, you may provide us with your name, address, email address, and telephone number when you request that a PGIM representative contact you, when you fill out a survey or form, or 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 the Services. 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 Services, 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 a variety of business purposes. In the chart below, we describe these different purposes, related activities, the categories of Personal Information involved and where applicable, the associated legal bases. We have also indicated where Personal Information is required in order to carry out the purpose and related activities.

PURPOSE	ASSOCIATED ACTIVITIES	PERSONAL INFORMATION	LEGAL BASES
Responding to Inquiries and Facilitating Engagement	Such as: 1) providing responses to general inquiries made through contact information or forms provided on our Websites; and 2) facilitating social sharing you choose to engage in and responding to posts on our Social Media Pages.	Name; contact information; company or institution information; other information specific to an inquiry or request; and information and content you may choose to post or provide.	Legitimate interests, such as responding to general inquiries and facilitating the functionality of the Services.
Transactions & Account Management	Such as: 1) verifying an individual's identity or location (or the identity or location of your representative or agent) to allow account access; 2) conducting online transactions; 3) responding to customers' inquiries and fulfilling their requests; and 4) contacting individuals in	Name; contact information; account username; account information or other Company or online identifiers; information specific to an inquiry or request; information	Performance of a contract, such as executing investment transactions for clients.

	connection with existing transactions and contractual agreements.	and content you may choose to provide.	
Personalizing and Improving the Services	Such as: 1) personalizing content, such as delivering content specific to your region or language; and 2) analyzing data and conducting audits to develop and improve Website performance and content, such as identifying usage trends to understand which parts of our Services are of most interest to users.	Name; contact information; IP address (for the purpose of obtaining approximate country location).	Legitimate interests, such as enhancing and improving product and service offerings.
Operations and General Business Purposes	Such as: 1) for data analysis, for example, to improve the efficiency of our Services; 2) for audits, to verify that our internal processes function as intended and to address legal, regulatory, or contractual requirements; 3) for fraud prevention and fraud and 4) sending administrative information to our customers, including changes to our terms and conditions.	Name; contact information; IP address.	Performance of a contract, such as providing notice of modified terms and conditions. Legitimate interests, such as ensuring security of the Services and our data. Legal obligations, such as complying with regulations.
Marketing & Promotions	Such as providing visitors with our newsletter and/or other marketing materials.	Name; contact information; company or institution information; communication/content preferences (ex. Frequency, method, subject matter).	Consent, such as honoring the mode of communication preferences (e.g., email, SMS). Legitimate interests, such as providing advertisements for related products and services.

HOW WE DISCLOSE PERSONAL INFORMATION

We disclose Personal Information to:

- **The appropriate PGIM organization or affiliate** so it can respond to your request
 - A listing of our affiliates and their locations can be provided by contacting your Client Service Representative or pgim.privacy@pgim.com for a listing of our affiliates and their locations.
- **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, fraud prevention, information technology and related infrastructure provision, customer service, email delivery, auditing, and other services.
- **By using the Services, you may elect to disclose Personal Information.**
 - On other services to which you are able to post information and content (including, without limitation, our Social Media Pages). Please note that any information you post or disclose through these services will become public and may be available to other users and the general public.

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 necessary or appropriate.
 - 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

“**Other Information**” is any information that does not reveal a person’s specific identity or does not directly relate to an identifiable individual. The Services collect Other Information such as:

- 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 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: Adobe Analytics, pixel tags, a browser or device; physical location; device fingerprinting; using cookies and other similar technologies; and through IP addresses. Please see our Cookies & Similar Technology Statement [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, 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 organizational, administrative, and technical, measures to protect Personal Information within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. 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.

SENSITIVE INFORMATION

Unless specifically requested, we ask that you not send us, and you not disclose, any 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 Services or otherwise to us.

CHOICE AND ACCESS

Marketing communications

PGIM gives you choices regarding our use and disclosure of your Personal Information for marketing purposes. You may opt out from receiving marketing-related emails from us. If you no longer want to receive marketing related emails from us on a going-forward basis, you may opt out by [clicking on the unsubscribe link at the bottom of one of our marketing emails] or by contacting us at: pgim.privacy@pgim.com.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt out of receiving marketing related emails from us, we may still send you important administrative messages, from which you cannot opt out.

How you can access, change, or delete your Personal Information

If you would like to request to access, correct, update, suppress, restrict or delete Personal Information, object to or opt out of the processing of Personal Information, or if you would like to request to receive a copy of your Personal Information for purposes of transmitting it to another company (in each case, to the extent these rights are 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.

In your request, please make clear what Personal Information you would like to have changed or whether you would like to have your Personal Information suppressed from our database. For your protection, we may only implement requests with respect to the Personal Information associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable. Please note that we may need to retain certain information for recordkeeping or other purposes.

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 you and provide the Services to you;
- 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 Services link. The inclusion of a link on the Services 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 by using the Services 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 Services 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.

ADDITIONAL INFORMATION REGARDING THE UK AND EEA

You may also:

- The contact information for our data protection officer (DPO) in Germany is as follows:

Jochen Geck
VIVACIS Consulting GmbH
Horexstraße 1 | ALTER GÜTERBAHNHOF
D - 61352 Bad Homburg
Telephone: +49 160 938 492 30
Email: jochen.geck@vivacis.de

- Lodge a complaint with an EU/EEA or the UK data protection authority for your country or region where you have your habitual residence or place of work or where an alleged infringement of applicable data protection law occurs. A list of data protection authorities in the EU/EEA is available at [HTTP://EC.EUROPA.EU/NEWSROOM/ARTICLE29/ITEM-DETAIL.CFM?ITEM_ID=612080](http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080) and information regarding lodging a complaint with the UK ICO can be found here: <https://ico.org.uk/make-a-complaint/>

ADDITIONAL INFORMATION REGARDING SINGAPORE

- The contact information for our data protection officer (DPO) in Singapore is as follows:

Cai Kuangyi, Director, Operational Risk Management
88 Market Street #43-06 CapitaSpring, Singapore 048948
Telephone: Main Office: +65 6735 2833
Direct Line: +65 6739 7234

Email: colin.cai@pgim.com

- For lodging complaints to the regulatory body, PDPC, members of public will use the following website: <https://www.pdpc.gov.sg/complaints-and-reviews>