

Townsend Privacy Notice

Townsend Holdings LLC (d/b/a The Townsend Group) ("Townsend") is a subsidiary of Aon Plc. **Aon plc.** ("Aon") is a leading global professional services firm providing a broad range of risk, retirement and health solutions. Aon is committed to protecting your privacy. This commitment reflects the value we place on earning and keeping the trust of our customers, business partners, and others who share their personal information with us.

What does this Privacy Notice do?

This Privacy Notice ("Notice") explains Aon's information processing practices. It applies to any personal information you provide to us and any personal information we collect from other sources. This Notice is a statement of our practices and of your rights regarding your personal information. This is not a contractual document, and it does not create any rights or obligations on either party, beyond those which already exist under data protection laws.

This Notice does not apply to your use of a third-party site linked to this website.

If you have a disability and require an alternative format to this privacy notice, please email us at: privacy@aon.com so that we may provide you with a more suitable format.

Who is responsible for your information?

Throughout this Notice, Aon refers to **Aon plc.**, including its affiliated companies and subsidiaries (also referred to as "we", "us", or "our"). Aon is responsible for your personal information (and the *controller* for the purposes of data protection laws) that we collect from or about you.

When and how do we collect your information?

We may collect personal information in the following ways:

Category	Description
From Our Clients	When we perform services for our clients.
Service Requests	When you request a service from us.
Registration	When you register with or use any of our websites or applications.
Application	When you submit an application to Aon.
Contact Us	If you contact us with a complaint or query.
Social Media	When you engage with us over social media.

For specific information on the source for each category of personal information collected, please see the section titled "Categories of personal information we may collect, disclose, and "sell" (as defined under applicable law" below.

What information do we collect?

In general, we may collect personal information about you that you provide to us, that we receive from third parties or that we indirectly collect or infer about your activities or usage of our websites,

apps or services. The actual personal information we collect about you varies depending upon the nature of the services and our interactions for you.

Information you provide to us

When you request services, we ask that you provide accurate and necessary information that enables us to respond to your request. When you provide personal information to us, we use it for the purposes for which it was provided to us as stated at the point of collection or as obvious from the context of collection, for example providing an insurance quote, applying for a position with us or creating a profile on our website or application.

More information about the categories of personal information collected for each of our services, together with the purpose and legal basis for collecting the information is provided below.

We will not knowingly collect any sensitive personal information unless this is required. Sensitive personal information includes a number of types of data relating to: race or ethnic origin; political opinions; religious or other similar beliefs; trade union membership; physical or mental health; sexual life.

If you provide us with sensitive personal information, you understand and give your explicit consent that we may collect, use and disclose this information to appropriate third parties for the purposes described in this Notice. If you provide personal information about other individuals such as employees or dependents, you must obtain their consent prior to your disclosure to us.

Information we collect over Aon websites, mobile applications and social media

We may ask you for personal information, such as name and contact information, when you register for events, request services, manage accounts, access various content and features or directly visit our websites. (For purposes of this Notice, "website" includes our mobile applications.)

In some instances, we automatically collect certain types of information when you visit our websites and through e-mails that we may exchange. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons. Further information about our use of cookies can be found in our [Cookie Notice](#) and through our Cookie Preference Center, which can be found by selecting the "*Do Not Sell or Share My Personal Information*" link at the footer of the applicable Aon Privacy Notice.

Social media. You can engage with us through social media websites or through features such as plug-ins or applications on our websites that integrate with social media sites. You may also choose to link your account with us to third party social media sites. When you link your account or engage with us on or through third party social media sites, plug-ins, or applications, you may allow us to have ongoing access to certain information from your social media account (e.g., name, e-mail address, photo, gender, birthday, the posts or the 'likes' you make).

Content you post. If you post information when you interact with our websites through social media sites, plug-ins, or other applications, depending on your privacy settings, this information may become public on the Internet. You can control what information you share through privacy settings available on some social media sites. For more information about how you can customize your privacy settings and how third-party social media sites handle your personal information, please refer to their privacy help guides, privacy notices and terms of use.

Mobile devices. If you access our websites on your mobile telephone or mobile device, we may also collect your unique device identifier and mobile device IP address, as well as information about your device's operating system, mobile carrier and your location information. We may also ask you to

consent to providing your mobile phone number (for example, so that we can send you push notifications).

Location Specific Privacy Notices

Aon PLC, including its affiliated companies and subsidiaries, recognizes that as the landscape of data privacy regulations evolves, there may be additional policy notices pertinent to your location. For more information about how Aon collects, discloses, and shares Sensitive Personal Information of specific state residents, please reference the Privacy Notice for US Locations with Applicable Privacy Laws, available on the [Aon Global Privacy Statement](#). All other applicable location-specific notices will also be accessible on this global site link.

Categories of personal information we may collect and disclose.

The types and categories of personal information we collect about you depends on the nature of the services we provide to you and our interactions with you. Additionally, we may disclose personal information to third parties and services providers for the purposes identified below.

In general, we do not disclose or share personal information to third parties in exchange for their monetary payment to us. The categories of information we may collect, disclose, and “sell” are as follows:

Categories of personal information	Specific types of personal information	Category of sources from which this personal information is obtained	Is this personal information collected?
Name, contact and identifiers	Identifiers such as 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.	From our Clients, Service Requests, Registration, Application, Social media, contact us page	Yes
Customer Records	Paper and electronic customer records containing personal information, such as name, signature, social security number, physical characteristics	From our Clients, Service Requests, Registration, Application, Social	Yes

	<p>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.</p>	<p>media, contact us page</p>	
<p>Protected Classifications</p>	<p>Characteristics of protected classifications under California or federal law.</p>	<p>From our Clients, Service Requests, Registration, Application, Social media, contact us page</p>	<p>Yes</p>
<p>Purchase history and tendencies</p>	<p>Commercial information including records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies</p>	<p>From our Clients, Service Requests, Registration, Application, Social media, contact us page</p>	<p>Yes</p>
<p>Biometric Information</p>	<p>Physiological, biological or behavioral characteristics that can be used alone or in combination with each other to establish individual identity, including DNA, imagery of the iris, retina, fingerprint, face, hand, palm, vein patterns, and voice recordings, from which an</p>	<p>NA</p>	<p>No</p>

	<p>identifier template, such as a faceprint, a minutiae template, or a voiceprint, can be extracted, and keystroke patterns or rhythms, gait patterns or rhythms, and sleep, health, or exercise data that contain identifying information</p>		
Usage data	<p>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 website, application, or advertisement.</p>	NA	No
Geolocation Data	<p>Precise geographic location information about a particular individual or device.</p>	<p>From our Clients, Service Requests, Registration, Application, Social media, contact us page</p>	Yes
Audio/Visual Data	<p>Audio, electronic, visual, thermal, olfactory, or similar information</p>	NA	No
Employment History	<p>Professional or employment-related information</p>	<p>From our Clients, Service Requests, Registration, Application, Social media, contact us page</p>	Yes

Educational Information	Information about education-related history or background	From our Clients, Service Requests, Registration, Application, Social media, contact us page	Yes
Profiles and Inferences	Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	NA	No
"Sensitive data"	Information relating to race or ethnic origin; political opinions; religious or other similar beliefs; trade union membership; physical or mental health; sexual life.	From our Clients, Service Requests, Registration, Application, Social media, contact us page	Yes

How do we use your personal information?

The following is a summary of the purposes for which we use personal information. More information about the personal information collected for each of our services, together with the purpose and legal basis for collecting the information will be provided to you below.

Performing services for our clients

We process personal information which our clients provide to us in order to perform our professional risk based advisory services. The precise purposes for which your personal information is processed will be determined by the scope and specification of our client engagement, and by applicable laws, regulatory guidance and professional standards. It is the obligation of our client to ensure that you understand that your personal information will be disclosed to Business partner. If you are a registered fund manager, you may receive information through the Townsend portal. Townsend may use your personally identifiable information to provide you access to the Townsend portal.

The categories of information we use to perform our services include Name and Contact identifiers, Customer Records, Protected Classifications, Purchase History and Tendencies, Geolocation Data, Educational information, Employment history, and Sensitive data.

Administering our client engagements

We process personal information about our clients and the individual representatives of our corporate clients in order to:

- Perform underwriting and administrative services for our Business partners;
- Carry out client communication, service, billing and administration;
Deal with client complaints;
- Administer claims.

The categories of information we use to administer our client engagements include Name and Contact identifiers, Customer Records, Protected Classifications, Purchase History and Tendencies, Geolocation Data, Educational information, Employment history, and Sensitive data.

Contacting and marketing our clients and prospective clients

We process personal information about our clients and the individual representatives of our corporate clients in order to:

- contact our clients or prospective clients in relation to current, future and proposed engagements;
- send our clients or prospective clients newsletters, know-how, promotional material and other marketing communications;
- invite our clients or prospective clients to events (and arrange and administer those events).

The categories of information we use to contact and market to our clients and prospective clients include Name and Contact identifiers.

Conducting data analytics

We are an innovative business, which relies on developing sophisticated products and services by drawing on our experience from prior engagements. We are not concerned with an analysis of identifiable individuals, and we take steps to ensure that your rights and the legitimacy of our activities are ensured through the use of aggregated or otherwise de-identified data.

The categories of information we use to conduct data analytics include Name and Contact identifiers, Customer Records, Protected Classifications, Geolocation Data, Educational information, Employment history.

If we wish to use your personal information for a purpose which is not compatible with the purpose for which it was collected for, we will request your consent. In all cases, we balance our legal use of your personal information with your interests, rights, and freedoms in accordance with applicable laws and regulations to make sure that your personal information is not subject to unnecessary risk.

Legal basis

All processing (i.e. use) of your personal information is justified by a "lawful basis" for processing. In the majority of cases, processing will be justified on the basis that:

- the processing is necessary for the performance of a contract to which you are a party, or to take steps (at your request) to enter into a contract (e.g. where we help an employer to fulfil an obligation to you under an employment contract in relation to the delivery of employee benefits);
- the processing is necessary for us to comply with a relevant legal obligation (e.g. where we are required to collect certain information about our clients for tax or accounting purposes, or where we are required to make disclosures to courts or regulators); or
- the processing is in our legitimate commercial interests, subject to your interests and fundamental rights (e.g. where we use personal information provided to us by our clients to deliver our services, and that processing is not necessary in relation to a contract to which you are a party).

In limited circumstances, we will use your consent as the basis for processing your personal information, for example, where we are required to obtain your prior consent in order to send you marketing communications.

Before collecting and/or using any personal information, or criminal record data, we will establish a lawful basis which will allow us to use that information. This basis will typically be the establishment, exercise or defense by us or third parties of legal claims.
your explicit consent;

Do we collect information from children?

We do not directly provide services to children, and we do not knowingly collect personal information from children.

How long do we retain your personal information?

How long we retain your personal information depends on the purpose for which it was obtained and its nature. We will keep your personal information for no more than the time required to fulfil the purposes described in this privacy notice unless a longer retention period is permitted by law. We have implemented appropriate measures to ensure your personal information is securely destroyed in a timely and consistent manner when no longer required.

In specific circumstances we may store your personal information for longer periods of time so that we have an accurate record of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings.

Do we disclose your personal information?

Within Aon

We may share your personal information with other Aon entities, brands, divisions, and subsidiaries to serve you, including for the activities listed above.

We do not rent, sell or otherwise disclose personal information with unaffiliated third parties for their own marketing use. We do not share your personal information with third parties except in the following circumstances discussed below.

Business Partners

We may disclose personal information to business partners who provide certain specialized services to us, or who co-operate with us on projects. These business partners operate as separate *controllers*, and are responsible for their own compliance with data protection laws. You should refer to their privacy notices for more information about their practices.

Examples include:

- *Banking and finance products* - credit and fraud reporting agencies, debt collection agencies, insurers, reinsurers, and managed fund organizations for financial planning, investment products and trustee or custodial services in which you invest
- *Insurance broking and insurance products* - insurers, reinsurers, other insurance intermediaries, insurance reference bureaus, medical service providers, fraud detection agencies, our advisers such as loss adjusters, lawyers and accountants and others involved in the claims handling process

The categories of information shared with our business partners include Name and Contact Identifiers, Customer Records, Protected Classifications, Purchase History and Tendencies, Geolocation Data, Educational information, Employment history, and Sensitive data.

Authorized Service Providers

We may disclose your information to service providers we have retained (as *processors*) to perform services on our behalf (either in relation to services performed for our clients, or information which we use for its own purposes, such as marketing). These service providers are contractually restricted from using or disclosing the information except as necessary to perform services on our behalf or to comply with legal requirements. These activities could include any of the processing activities that we carry out as described in the above section, 'How we use your personal information.' Examples include IT service providers who manage our IT and back office systems and telecommunications networks; marketing automation providers; contact center providers.

These third parties appropriately safeguard your data, and their activities are limited to the purposes for which your data was provided.

The categories of information shared with our authorized service providers include Name and Contact identifiers, Customer Records, Educational information, Employment history, and Sensitive data.

Legal Requirements and Business Transfers

We may disclose personal information (i) if we are required to do so by law, legal process, statute, rule, regulation, or professional standard, or to respond to a subpoena, search warrant, or other legal request. (ii) in response to law enforcement authority or other government official requests, (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, (iv) in connection with an investigation of suspected or actual illegal activity or (v) in the event that we are subject to a merger or acquisition to the new owner of the business, or in the event of the dissolution of our business. Disclosure may also be required for company audits or to investigate a complaint or security threat.

Do we transfer your personal information across geographies?

We are a global organization and may transfer certain personal information across geographical borders to our, authorized service providers or business partners in other countries working on our behalf in accordance with applicable law. Our affiliates and third parties may be based locally or they may be overseas some of which have not been determined by the European Commission to have an adequate level of data protection.

When we do, we use a variety of legal mechanisms to help ensure your rights and protections travel with your data:

- we ensure transfers within are covered by agreements based on the EU Commission's standard contractual clauses, which contractually oblige each member to ensure that personal information receives an adequate and consistent level of protection wherever it resides within;
- where we transfer your personal information outside of us or to third parties who help provide our products and services, we obtain contractual commitments from them to protect your personal information. Some of these assurances are well recognized certification schemes like the EU - US Privacy Shield for the protection of personal information transferred from within the EU to the United States, or the standard contractual clauses; or
- where we receive requests for information from law enforcement or regulators, we carefully validate these requests before any personal information are disclosed.

Examples of countries we may transfer personal information to include, but are not limited to, the United States of America, the United Kingdom, Ireland, Singapore, India, Canada, and the Philippines.

If you would like further information about whether your information will be disclosed to overseas recipients, please contact us as noted below. You also have a right to contact us for more information about the safeguards we have put in place (including a copy of relevant contractual commitments, which may be redacted for reasons of commercial confidentiality) to ensure the adequate protection of your personal information when this is transferred as mentioned above.

Do we have security measures in place to protect your information?

The security of your personal information is important to us and we have implemented reasonable physical, technical and administrative security standards to protect personal information from loss, misuse, alteration or destruction. We protect your personal information against unauthorized access, use or disclosure, using security technologies and procedures, such as encryption and limited access. Only authorized individuals access your personal information, and they receive training about the importance of protecting personal information.

Our service providers and agents are contractually bound to maintain the confidentiality of personal information and may not use the information for any unauthorized purpose.

Transmission Errors or Unauthorized Acts: Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, Townsend cannot ensure or warrant the security of any information you transmit to us or any information provided by our on-line products or services, and you do so at your own risk. Townsend will not be liable for disclosures of your personal information due to errors in transmission or unauthorized acts of third parties. However, once we receive your transmission, we do our best to ensure its security on our systems by making reasonable efforts to protect the information.

Security: Any information provided to Townsend is treated with care and discretion. When information is shared, Townsend will take a proactive approach to ensure the information is kept private and not misused.

Passwords: If you are a registered fund manager, your account and personal information is password protected. Townsend encrypts your password on its database. However, you are responsible for maintaining the confidentiality of your password. Therefore, we recommend that you do not divulge your password to anyone. We will never ask you for your password in an unsolicited phone call or in an unsolicited e-mail. Also, remember to close your browser window when you have finished using our Web Site.

Encryption: When you submit personal information to Townsend, we may encrypt it. Encryption is the industry standard means to protect information as it passes over the Web to our server. We use care to protect this information against unauthorized access and modification once it is stored on our database.

What choices do you have about your personal information?

We communicate with our customers to provide direct services and updates regarding our products. Townsend respects your decisions about the collection and use of your information. You have the opportunity to elect to receive future press releases and investor-oriented materials from us. Based on this choice, you may receive information from Townsend or a trusted third party. Every communication we send to you will contain instructions on how to cancel receiving similar information in the future. By accessing and using this website, you consent to the use of your personal information by Townsend in the manner specified in this Privacy Policy. If at any time you

wish to stop receiving information that we think you will find valuable, you can elect to do so by contacting us at **(216) 781-9090**.

In addition, you may have the right to “opt-out” of any *sale* of your personal information by us, as explained in the “**Other rights**” section below.

How can you update your communication preferences?

We take reasonable steps to provide you with communication about your information. If you have given Townsend information in the past and now wish to change such information, please contact us at **(216) 781-9090**. Although Townsend will make reasonable efforts to make the changes you have requested, we may be unable to update other types of information provided to us, such as aggregate or cookie information, or information that has been stored in our system.

You may also be able to update your communication preferences in the following ways:

Profile

If you have created a profile or account on one of our websites, you can update your contact information after you log into your account. You can also choose to delete your profile from our active database by either using the online system or by e-mailing us at the same address.

Newsletters

If you request electronic communications, such as an e-newsletter, you will be able to unsubscribe at any time by following the instructions included in the communication.

Mobile Devices

If you previously chose to receive push notifications on your mobile device from us but no longer wish to receive them, you can manage your preferences either through your device or the application settings. If you no longer wish to have any information collected by the mobile application, you may uninstall the application by using the uninstall process available on your mobile device.

Email

Contact us by e-mail or postal address as noted below. Please include your current contact information, the information you are interested in accessing and your requested changes. If we do not provide you with access, we will provide you with the reason for refusal and inform you of any exceptions relied upon.

Other rights regarding your data

Data protection laws vary among countries, with some providing more protection than others. Subject to certain exemptions, and in some cases, particularly if you reside in a jurisdiction with applicable privacy laws, dependent upon the processing activity we are undertaking, you have certain rights in relation to your personal information.

Right to Access

You have right to access personal information, and the categories thereof, which we hold about you. If you have created a profile, you can access that information by visiting your account or making a request online or by phone at **(216) 781-9090**.

Right to Rectification

You have a right to request us to correct your personal information where it is inaccurate or out of date.

Right to be Forgotten (Right to Erasure)

You have the right to request under certain circumstances to have your personal information erased. Your information can only be erased if your data is no longer necessary for the purpose for which it was collected, and we have no other legal ground for processing the data.

Right to Restrict Processing

You have the right to restrict the processing of your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

Right to Data Portability

You have the right to data portability, which requires us to provide personal information to you or another controller in a commonly used, machine readable format, but only where the processing of that information is based on (i) consent; or (ii) the performance of a contract to which you are a party.

Right to Object to Processing

You have the right to object the processing of your personal information at any time, but only where that processing has our legitimate interests as its legal basis. If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

Do-Not-Sell

Do-Not-Sell: You have the right to opt-out of our sale of your Personal Information. Our sale of your information is limited to third-party cookies used to track activity and deliver targeted ads. To exercise this right, you can turn off cookies as described in our [Cookie Notice](#).

International Transfers

As noted above, you can ask to obtain a copy of, or reference to, the safeguards under which your personal information is transferred outside of the European Union.

If applicable, how do you exercise these rights?

If you would like to exercise your rights, or if you have any questions about this Privacy Policy, the practices of this website, or your dealings with this website, or would like to provide comments, please **contact Townsend at (216) 781-9090**.

Additionally, you can exercise your rights by contacting us at privacy@aon.com or by sending a complaint to Aon Global Privacy Office, Aon plc, 200 E. Randolph, Chicago, Illinois 60601. Subject to legal and other permissible considerations, we will make every reasonable effort to honor your request promptly or inform you if we require further information in order to fulfill your request.

To verify your identity, please be prepared to offer the following information: you name, zip code, Policy Number or Claim Number, and any other information you have previously provided to Aon. We may ask you for additional information to confirm your identity and for security purposes, before disclosing the personal information requested to you. We reserve the right to charge a fee

where permitted by law, for instance if your request is manifestly unfounded or excessive.

You may also be able to designate an authorized agent to make a request regarding these rights on your behalf. If you would like to do so, please have your authorized agent use the contact email or number above and state within their request they are your authorized agent. If needed, Aon will inform the authorized agent of any additional verification data needed to process such request at that time.

We may not always be able to fully address your request, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

Disclosure of Incentives: If businesses offer any financial incentives for the collection, sale or deletion of their personal information, consumers have the rights to be notified of any financial incentives offers and their material terms, as well as the to not be opted into such offers without prior informed opt-in consent and to be able to opt-out of such offers at any time. Businesses may not offer unjust, unreasonable, coercive or usurious financial incentives. We do not offer any incentives at this time.

Contact Us

Privacy and security is important to us all at Townsend. We pursue a full-disclosure approach to responsibly care for the information you have entrusted with us, and we depend on information sharing as our principal means to best serve you. This is why we are committed to building a trusting relationship with you. We will continually monitor customer feedback and seek to improve our services to meet your needs. If you have any questions about this Privacy Policy, the practices of this website, or your dealings with this website, or would like to provide comments, please **contact Townsend at (216) 781-9090**.

Additionally, if you would like further information about Aon's privacy and information handling practices, would like to discuss opt-outs or withdrawing consent, or would like to make a complaint about a breach of the law or this Privacy Notice, please contact the Privacy Officer: privacy@aon.com. Alternatively, you have the right to contact your local Data Protection Authority.

If you have any questions relating to this Notice, please contact **Townsend at (216) 781-9090** or the Aon Global Privacy Office, Aon plc, 200 E. Randolph, Chicago, Illinois 60601 or privacy@aon.com.

Changes to this Notice

We may update this Notice from time to time. When we do, we will post the current version on this site, and we will revise the version date located at the bottom of this page.

We encourage you to periodically review this Notice so that you will be aware of our privacy practices.

This Statement was last updated March 2024.