

MERCER ADVISORS PRIVACY POLICY FOR CALIFORNIA RESIDENTS

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The privacy of your personal information is important to us at Mercer Global Advisors Inc (Mercer Advisors). We are committed to protect the privacy of this information. This privacy policy is for individuals and website visitors who are California consumers, as defined below (this “California Privacy Policy”) and supplements the information contained in Mercer Advisors’ general privacy policy issued pursuant to Regulation S-P under the Gramm-Leach-Bliley Act (“GLBA”) and located on our website at (the “[Mercer Advisors Privacy Notice](#)”).

1. OVERVIEW OF THIS CALIFORNIA PRIVACY POLICY

The California Consumer Privacy Act (“CCPA”) gives California consumers certain privacy rights related to their personal information. This document describes the rights that California consumers may have under the CCPA.

What is “personal information”? For the purposes of this California Privacy Policy, “personal information” is defined as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California consumer or California household. For purposes of this California Privacy Policy, personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated information.
- Other regulated information that is excluded from the CCPA’s scope, such as personal information covered by certain sector-specific privacy laws, including the GLBA (which includes rules implementing the GLBA, such as Regulation S-P, which governs the privacy requirements of investment advisers under the GLBA).

What information is excluded from this California Privacy Policy? As mentioned above, the CCPA does not cover personal information that is subject to the GLBA (which includes rules implementing the GLBA, such as Regulation S-P). Therefore, this California Privacy Policy excludes information we collect about you that is subject to the GLBA, such as information about California residents who obtain financial products or advisory services from us or information that is collected in order to service your account. For more information about how we collect, use and disclose this information, please refer to our Mercer Advisors Privacy Notice.

Who are “California consumers”? A “California consumer” is a natural person who resides in California. For the purposes of this California Privacy Policy, a California consumer does not include persons to the extent they are (i) acting as an employee, owner, director, officer or contractor of a company, partnership, sole proprietorship, nonprofit or government agency that is doing business with Mercer Advisors or (ii) acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of Mercer Advisors.

2. HOW WE COLLECT, USE, AND SHARE PERSONAL INFORMATION

Mercer Advisors collects personal information from you in different ways and for different purposes, as described further below. The table below describes the categories of personal information we may

collect and that we may have collected about California consumers in the twelve (12) months prior to the date of this California Privacy Policy, the sources from which we may have collected that personal information, the purposes for which we may use and may have used that personal information, and the third parties with whom we may have shared that personal information. It is important to note that the types of personal information we collect will depend on your interaction with us, including the types of products or services you use.

Category	Examples	Collected	Purpose for Collection
Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES	Contacting you or your designated representative. Sharing information about our services with you, including investment research.
Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	Providing and improving our services, such as by personalizing content. We also use this data to support fraud prevention and detection.
Geolocation data.	Physical location or movements.	YES	Delivering products and services; Marketing.
Professional or employment-related information.	Current or past job history or performance evaluations.	YES	Support employment, infrastructure, and human resource management.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes,	YES	Support employment, infrastructure, and human resource management.

	student financial information, or student disciplinary records.		
Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES	Manage, improve, and develop our business.

Information We Collect Through Automatic Data Collection Technologies

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.
- Identifying the areas of our website that you have visited.

We also may use these technologies to collect information about your online activities over time and across third-party websites or other online services (behavioral tracking). Our website uses Google Analytics to collect information about the use of our website.

The information we collect automatically may include personal information. It helps us to improve our Website and to deliver a better and more personalized service, including by enabling us to:

- Estimate our audience size and usage patterns.
- Store information about your preferences, allowing us to customize our Website according to your individual interests.
- Speed up your searches.
- Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- **Cookies (or browser cookies).** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- **Flash Cookies.** Certain features of our Website may use local stored objects (or Flash cookies) to collect and store information about your preferences and navigation to, from, and on our Website. Flash cookies are not managed by the same browser settings as are used for browser cookies. For information about managing your privacy and security settings for Flash cookies, see Choices About How We Use and Disclose Your Information.

- **Web Beacons.** Pages of the Website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit the Company, for example, to count users who have visited those pages or and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

We may use cookies for:

- Identifying the areas of our website that you have visited.
- Personalizing content that you see on our website.
- Our website analytics.
- Remarketing our products or services to you through third-party vendors and Google on sites across the Internet.
- To serve ads based on past visits to the website you through third-party vendors and Google.
- Remembering your preferences, settings, and login details.
- Targeted advertising and serving ads relevant to your interests.
- Affiliate marketing.
- Allowing you to share content with social networks.

Third-Party Use of Cookies and Other Tracking Technologies

Some content or applications, including advertisements, on the Website are served by third-parties, including advertisers, ad networks and servers, content providers, and application providers. These third parties may use cookies alone or in conjunction with web beacons or other tracking technologies to collect information about you when you use our Website. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites and other online services. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

3. NO SALE OF PERSONAL INFORMATION

While we may disclose personal information with our service providers and our affiliates who assist us in servicing your account, we have not sold personal information about you to any third party in the twelve (12) months prior to the date of this California Privacy Policy, and will not sell personal information about you until further notice. If we change our practices in the future for any new information that we collect from you, we will notify you by updating this California Privacy Policy.

4. CCPA RIGHTS FOR CALIFORNIA CONSUMERS

The CCPA provides California consumers with certain rights with regard to their personal information. This Section explains those rights. If you are a California consumer and would like to exercise any of those rights, please see Section 4.E below for more information on how to submit a request.

As mentioned above, the CCPA does not cover personal information that is subject to the GLBA. Therefore, this California Privacy Policy excludes information we collect about you that is subject to the GLBA, such as information that we collect about California residents who obtain financial products or

advisory services from us. For more information about how we collect, use and disclose this information, please refer to our Mercer Advisors Privacy Notice.

a. RIGHT TO KNOW ABOUT AND ACCESS YOUR PERSONAL INFORMATION

If you are a California consumer, you may have the right to request that Mercer Advisors provide you with information regarding what personal information about you we have collected, used, disclosed, or sold in the preceding twelve (12) months. Once we receive your request and verify your identity, we will disclose to you one or more of the following as requested:

The categories of personal information we have collected about you in the preceding twelve (12) months.

- The categories of sources from which we collected your personal information in the preceding twelve (12) months.
- The business or commercial purposes for collecting your personal information in the preceding twelve (12) months.
- The categories of third parties with whom we shared your personal information in the preceding twelve (12) months.
- The specific pieces of personal information we collected about you in the preceding twelve (12) months.

You may only make a consumer request to know about or access your personal information twice within a twelve (12)-month period.

b. RIGHT TO DELETE YOUR PERSONAL INFORMATION

If you are a California consumer, you may have the right to request that Mercer Advisors delete certain of your personal information that we have collected from you. However, this right to deletion does not apply to any of your personal information that is subject to an exception under the CCPA (as described below). Once we receive your request and verify your identity, we will delete (and direct our service providers to delete) your personal information in our records that is not subject to any of the CCPA exceptions.

CCPA Exceptions

We may deny your deletion request where your personal information is required for any of the following reasons, which we will identify in our response to you if we deny your request:

- Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.

- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

c. RIGHT TO OPT-OUT OF THE SALE OF YOUR PERSONAL INFORMATION

We have not sold personal information about you to third parties in the twelve (12) months prior to the date of this California Privacy Policy and will not sell personal information about you until further notice. If we change our practices in the future for any new information that we collect from you, we will notify you by updating this California Privacy Policy.

d. PERSONAL INFORMATION FROM MINORS

We may collect personal information from minors for UGMA and UTMA custodial accounts. We follow all local legal requirements with respect to the collection and processing of a minor's personal information.

e. RIGHT TO NON-DISCRIMINATION

Mercer Advisors will not discriminate against any California consumer who exercises any of the rights described above. Specifically, except as permitted by the CCPA, we will not deny you goods or services; charge you different prices or rates, including through granting discounts or other benefits, or imposing penalties; provide you with a different level of service or quality of goods or services; or suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

f. HOW TO SUBMIT A REQUEST

If you are a California consumer and would like to exercise any of the CCPA rights identified above, you may submit a request by writing to service@merceraadvisors.com or by calling us at 720.500.8186.

g. SUBMITTING A REQUEST THROUGH YOUR AUTHORIZED AGENT

If you are a California consumer, you may have the option to designate an authorized agent to submit a request on your behalf, so long as the authorized agent has your written permission to do so and you have taken steps to verify your identity directly with us. If you would like to designate an agent, your agent must register as such with the California Secretary of State and submit a copy of this registration along with your consumer request to us. We may need to contact you directly to verify the request.

h. HOW WE VERIFY YOUR REQUEST

We cannot fulfill your request to provide you with or delete your personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us.

If you send us a request by calling the toll-free number or the dedicated privacy email address, we will contact you using the phone number or the email address that we have on file.

Depending on your type of request or the information requested by you, we may require additional information in order to verify your identity and fulfill your request. If we cannot successfully verify your identity, we will inform you of that fact.

In accordance with the CCPA, we will respond to your request within forty-five (45) days. However, in certain circumstances, we may require additional time to process your request, as permitted by the CCPA or other applicable law. We will advise you within forty-five (45) days after receiving your request if such an extension is necessary and why it is needed. Any disclosures we provide will only cover the twelve (12)-month period preceding our receipt of your request. If we cannot fulfill your request, our response to you will also explain the reason why we cannot fulfill your request.

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

i. CONTACT FOR MORE INFORMATION

If you have any questions or concerns about this California Privacy Policy or our privacy practices, or to request this California Privacy Policy in another format, please write to us at service@merceradvisors.com