

This **Privacy Policy for California Residents** supplements the information contained in R.J. O'Brien & Associates, LLC's ("RJO" "we" or "us"), Account Application and in RJO's Privacy Policy on RJO's website or other privacy policy provided to you by RJO or an RJO affiliate and applies solely to all visitors, users, and others who reside in the State of California ("consumers" or "you"). We adopt this notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Policy.

Notice of Collection and Use of Personal Information

We collect information that identifies, relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device ("personal information"). Personal information does not include personal information covered by certain sector-specific privacy laws, including for example the Gramm-Leach-Bliley Act (GLBA).

Categories of Personal Information

In particular, we may have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. 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
B. Personal information categories listed in the California Consumer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, 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. Some personal information included in this category may overlap with other categories.	Yes
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, national origin, citizenship, marital status, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), veteran or military status (including familial genetic information).	No

D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	No
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, and voiceprints.	No
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes
G. Geolocation data.	Physical location or movements	Yes
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	Yes
I. Professional or Employment related information.	Current or past job history or background screening information.	Yes
J. 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, student financial information, or student disciplinary records.	No

K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No
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We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you as a result of your relationship with us; and
- Indirectly from you. For example, from observing your actions on our Website.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following purposes:

- To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our products or services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a product or service, we will use that information to process your payment and facilitate delivery. We may also save your information to facilitate the provision of future services.
- To provide, support, personalize, and develop our website, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests, purchases, transactions, and payments and prevent transactional fraud.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your website experience and to deliver content and product and service offerings relevant to your interests, including targeted offers through our website, third-party sites and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our website, products and services, databases and other technology assets and business.
- To use data analytics to improve our website, products/services, marketing, customer relationships and experiences.
- To respond to law enforcement requests and as required by applicable law, court order or governmental regulations.

- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our website users and consumers may be among the assets transferred.

We may collect personal information about minors when a custodial account is opened for a minor (such as Uniform Transfer to Minors Act and Coogan Act accounts) and when a minor is specified as a beneficiary of an account. We follow all applicable legal requirements with respect to the collection and processing of a minor's personal information.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sources of Personal Information

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from you. For example, from forms you complete or products and services you purchase.
- Indirectly from you. For example, from observing your actions on our website.
- Public records or widely available sources, including information from the media, and other records and information that are made available by federal, state, or local government entities.
- Outside companies or organizations that provide data to support business activities such as fraud prevention, underwriting, and marketing. Examples may include internet service providers, social networks, operating systems and platforms, data brokers, advertising networks, and data analytics providers.
- We use cookies and web beacons (also known as action tags or single-pixel gifs), and other technologies (collectively, "cookies") to provide us with data we can use to improve your experience and to know you better. Cookies are small text files sent from Web servers that may be stored on your computer. Cookies enable us to capture how you arrived at our site, when you return, which pages on our site you visit, and to recognize that you are already logged on when we receive a page request from your browser. We may link the information we store in cookies to personally identifiable information you submit while on our site. Cookies do not contain account or password information.
- All web browsers have settings that allow you to block cookies. By visiting our website with your browser set to allow cookies, you consent to our use of cookies as described above. If you choose to block cookies you may use our services but some functions may not work as designed.

Sharing Personal Information

We may share your personal information by disclosing it to our affiliates or third parties for a business purpose. In the preceding twelve (12) months, we have disclosed personal information for a business purpose to the categories of third parties indicated in the chart below.

We do not sell personal information. In the preceding twelve (12) months, we have not sold personal information.

Personal Information Category	Category of Third-Party Recipients
A: Identifiers.	<ul style="list-style-type: none"> • Affiliates and subsidiaries of RJO. • Third party service providers and outside organizations in connection with providing our products and services, completing transactions, supporting our everyday operations, or business management. • Government agencies. • Outside companies in connection with routine or required reporting.
B: California Customer Records personal information categories.	<ul style="list-style-type: none"> • Affiliates and subsidiaries of RJO. • Third party service providers and outside organizations in connection with providing our products and services, completing transactions, supporting our everyday operations, or business management. • Government agencies. • Outside organizations in connection with human resource activities. • Outside companies in connection with routine or required reporting.
C: Internet or other similar network activity.	<ul style="list-style-type: none"> • Affiliates and subsidiaries of RJO. • Third party service providers and outside organizations in connection with providing our products and services, completing transactions, supporting our everyday operations, or business management. • Government agencies. • Outside organizations in connection with human resource activities. • Outside companies in connection with routine or required reporting.
D: Geolocation data.	<ul style="list-style-type: none"> • Affiliates and subsidiaries of RJO. • Third party service providers and outside organizations in connection with providing our products and services, completing transactions, supporting our everyday operations, or business management. • Government agencies. • Outside organizations in connection with human resource activities. • Outside companies in connection with routine or required reporting.

E: Sensory data.	<ul style="list-style-type: none"> • Affiliates and subsidiaries of RJO. • Third party service providers and outside organizations in connection with providing our products and services, completing transactions, supporting our everyday operations, or business management. • Government agencies. • Outside organizations in connection with human resource activities. • Outside companies in connection with routine or required reporting.
F: Professional or employment-related information.	<ul style="list-style-type: none"> • Affiliates and subsidiaries of RJO. • Third party service providers and outside organizations in connection with providing our products and services, completing transactions, supporting our everyday operations, or business management. • Government agencies. • Outside organizations in connection with human resource activities. • Outside companies in connection with routine or required reporting.
G: Inferences drawn from other personal information.	<ul style="list-style-type: none"> • Affiliates and subsidiaries of RJO. • Third party service providers and outside organizations in connection with providing our products and services, completing transactions, supporting our everyday operations, or business management.

Your Rights and Choices

The CCPA provides consumers (California residents) with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Right to Know

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months (the “right to know”). This includes the right to know any or all of the following:

- The categories of personal information we collected about you.
- The categories of sources from which the personal information was collected.
- Our business or commercial purpose for collecting that personal information.
- The categories of personal information that we disclosed for a business purpose about you.
- The categories of third parties to whom the personal information was disclosed for a business purpose.
- The specific pieces of personal information we collected about you (also called a data portability request).

Right to Delete

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions (the “right to delete”). Once we receive your request and confirm your identity (see Exercising Your Rights to Know or Delete), we will review your request to see if an exception allowing us to retain the information applies. We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. 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, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Your Rights to Know or Delete

To exercise your rights to know or delete described above, please submit a request by either:

- Emailing us at Legal@rjobrien.com

Only you, or a person authorized by you to act on your behalf, may make a verifiable request to know or delete related to your personal information. A consumer can designate an authorized agent to make a request under the CCPA on the consumer's behalf. We may request that consumer's designation be provided in writing and that the consumer has verified their own identity with us.

You may only submit a request to know twice within a 12-month period. Your request to know or delete must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or you are an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

You do not need to create an account with us to submit a request to know or delete.

We will only use personal information provided in the request to verify the requestor's identity or authority to make it.

Response Timing and Format

We will confirm receipt of your request within ten (10) business days. We endeavor to substantively respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to another 45 days), we will inform you of the reason and extension period in writing.

If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding our receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable 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.

Right to Opt-Out and Opt-In to Sales

In the event that RJO decides to sell your personal information, we will only do so with prior notification and upon receiving your consent. You have the right to opt-out of the sale of your personal information. You also have the right to opt-in to the sale of your personal information.

Right to Non-Discrimination

You have the right not to receive discriminatory treatment by us for the exercise of your CCPA privacy rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.

- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Right to Opt-In to Financial Incentives

You have the right to opt-in to financial incentives. You also have the right to opt-out at any time. However, we do not offer any financial incentives.

Changes to Our Privacy Policy

This privacy policy replaces all previous disclosures we may have provided to you about our information practices with respect to your use of our website or the services provided to you by RJO. We reserve the right, at any time, to modify, alter, and/or update this privacy policy, and any such modifications, alterations, or updates will be effective upon our posting of the revised privacy policy or other means of delivery to you (such as email). Your continued use of the RJO website or services following our posting or other delivery of any revised privacy policy will constitute your acknowledgement of the amended privacy policy.

Contact Information

If you have any questions or comments about this notice, the ways in which RJO or its affiliates collect and use your information described here, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Email: Legal@rjobrien.com

Postal Address:

R.J. O'Brien & Associates, LLC

Attn: Legal Department

222 S. Riverside Plaza

Suite 1200

Chicago, IL 60606

If you need to access this Policy in an alternative format due to having a disability, please contact

Legal@rjobrien.com