



## California T. Rowe Price Human Resources Privacy Notice

T. Rowe Price Associates, Inc., and its subsidiaries and affiliates have prepared this Privacy Notice ("Notice") to be provided to individuals like you who are California residents and are either employed by, providing services to, interested in, or applying for, a job within a T. Rowe Price entity (individually and collectively, "T. Rowe Price," "we," and "us").<sup>1</sup> This Notice explains the types of personal information we collect, how we use it, who we share it with, and how we protect it. "Personal information" means information that (either in isolation or in combination with other available information) enables you to be identified as an individual or recognized directly or indirectly.

Please read the following carefully as it explains our views and practices regarding your personal information and how it is handled. This Notice is provided in accordance with the California Privacy Rights Act ("CPRA") (which sometimes also is referred to as the California Consumer Privacy Act or CCPA). Nothing in this Notice shall be understood to be a contract for, or offer of, employment.

### 1. Collection of Personal Information

We may collect personal information directly from you, or it may be supplied to us by another party. In most cases, we only allow other parties to control the collection of personal information about you when those other parties are acting as a service provider or contractor to us. The retention, use, and disclosure of your personal information by these companies is subject to our contracts and applicable laws. However, we may allow certain third parties to control collections of personal information under certain circumstances, such as the following:

- Certain third parties that have direct relationships with you and these companies handle your personal information in accordance with their own privacy notices and applicable laws. Examples include:
  - Employment services
  - Employee benefits providers, such as health insurance, employee assistance, or financial services benefits
  - Office related services such as food services, ATMs, or parking garages
  - Publications, trade association memberships, or professional licensing organizations
  - Personalized coaching/training services

In some cases, we may receive personal information in connection with your use of such services, such as when we are paying or reimbursing you for your use of the service.

- When you visit our websites or mobile apps ("site"), we may store or retrieve information on your browser or device, mostly in the form of cookies and similar technologies—such as web beacons, local storage, tags, and pixels. The site you visit may allow third party advertising partners to utilize cookies to deliver targeted advertising to you. For more information, please see our [Cookie Policy](#).
- We may engage professional consulting services or research firms to collect data for us. For example, if you participate in a survey we sponsor, the other firm will provide you with its contact information and privacy notice before you are asked to provide any personal information to it.

We may also collect personal information from other publicly or commercially available sources. We may create personal information about you, such as records regarding leaves of absence. We may also collect information about you from co-workers or clients, such as in connection with performance reviews or client satisfaction surveys. In each case, we only collect those data elements that are needed for our legitimate interests. We process all data that we obtain in accordance with this Notice, including data from your previous employer or from you, from other sources, or that we create.

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<sup>1</sup> Certain of our affiliated companies, such as Oak Hill Advisors L.P., may have their own human resources privacy notice or policy that applies to you.

## 2. General Purposes for Collecting, Using and Disclosing Personal Information

We collect, use, and disclose (“process”) your personal information (and information about others, such as your beneficiaries or dependents) for customary human resources (“HR”) purposes, as needed to enable our relationship with you, to comply with the law, and for our legitimate interests. The categories of personal information, along with representative data elements, are listed in the chart in Section 3 below. We generally collect, use, and disclose personal information for the purposes described below. While we have grouped the types of individuals with whom we engage when possible—for example, grouping information for individuals who are current employees or contractors—not all examples will be relevant depending on your exact role—for example, administration of insurance benefits programs is relevant for current employees, not contractors.

- Personal information pertaining to individuals while they are job applicants or prospective employees or contractors:
  - Recruitment and staffing, including evaluation of skills and job placement,
  - Hiring decisions, including negotiation of compensation, benefits, relocation packages, etc.,
  - Determining an individual’s eligibility to work and assisting with work permits or visas,
  - Risk management, including background checks, drug screenings, vetting, and verification, and
  - Everyday Business Purposes (defined below).
- Personal information pertaining to individuals while they are current employees or contractors:
  - Staffing and job placement, including scheduling and absence management,
  - Administration of compensation, insurance, and benefits programs,
  - Time and expense management and other workplace administration tasks (such as managing our computers and other assets, providing communication and social media tools, facilitating relationships within T. Rowe Price and with our clients and others, and offering community programs),
  - Diversity programs,
  - Health and wellness programs, including offering onsite medical care and accommodating disabilities,
  - Occupational health and safety programs (including required reporting, disaster and pandemic planning, and incident management),
  - Talent and performance development, skills management and training, performance reviews (including client feedback), engagement surveys, and recognition and reward programs,
  - Succession planning and tasks related to retention or reductions in force,
  - HR support services, such as responding to inquiries and resolving disputes,
  - Risk management, including employee and premises monitoring,
  - As requested by individuals, such as providing employment and income verification,
  - To perform services on behalf of us or a service provider, including maintaining or servicing HR administrative matters, processing payments, providing analytic services, or providing similar services on behalf of us or a service provider,
  - For relationship purposes, such as use or future use of photos and videos for publication purposes, and
  - Everyday Business Purposes.
- Personal information pertaining to individuals while they are former employees or contractors:
  - Potential re-employment or re-engagement,
  - Administration of compensation, insurance, and benefits programs, including retiree and alumni programs,
  - As requested by individuals, such as providing employment and income verification, and
  - Everyday Business Purposes.
- Personal information pertaining to individuals whose information is provided to T. Rowe Price in connection with our HR functions (such as family members, beneficiaries, dependents, emergency contacts, etc.) may be collected, used, and shared for:
  - Administration of compensation and benefit programs,
  - Workplace administration, such as maintenance of directories and to comply with child support orders or garnishments,
  - Legal compliance (such as in connection with required screening programs),
  - To maintain emergency contact lists and similar records, and
  - Everyday Business Purposes.

**Everyday Business Purposes** means the following purposes for which any personal information may be collected, used, and disclosed:

- Identity and credential management, including identity verification and authentication, issuing ID card and badges, system administration and management of access credentials,
- To protect the security and integrity of systems, networks, applications, and data, including debugging activities to identify and repair errors; detecting, analyzing, and resolving security threats and incidents; using data loss prevention tools to help guard against unauthorized disclosures or downloading of data; and collaborating with cybersecurity centers, consortia, regulators, and law enforcement regarding the same,
- To maintain safe, secure, and well-functioning information technology (IT) and communications systems and equipment, which may include tracking and analyzing activities you conduct on systems, networks, or devices we make available to you, including your use of the internet, and which may be conducted using security logging and monitoring tools. This includes processing browsing log files to help identify malware or other risks in associates Web surfing traffic,
- For legal and regulatory compliance, including all uses, disclosures, and retention of personal information that are required or permitted by law or for reasonably needed for compliance with company policies and procedures, security and incident response programs, intellectual property protection programs, and corporate ethics and compliance hotlines, including disclosures to tax or other regulatory authorities supporting employment-related requirements along with the administration of those requirements,
- For legal matters, including litigation and regulatory matters, including for use in connection with civil, criminal, administrative, or arbitral proceedings or before regulatory or self-regulatory bodies, including service of process, investigations in anticipation of litigation, or execution or enforcement of judgments and orders,
- Corporate audit, analysis and consolidated reporting,
- Making back-up copies for business continuity and disaster recovery purposes,
- As needed to facilitate corporate governance, including mergers, corporate reorganization, acquisitions, and divestitures,
- For internal business purposes, such as service provider management, finance, security, IT and physical infrastructure, record retention, corporate audit, analysis, training, quality assurance, and reporting,
- To undertake internal research and activities related to maintaining and improving our workforce, including changes to our services and benefits,
- To enforce our contracts and internal policies and to protect against injury, theft, legal liability, fraud, or abuse, and to protect people or property, including physical security programs, and
- To de-identify personal information or create aggregated data sets, such as for consolidating reporting, research, or analytics.

### 3. Specific Categories of Personal Information

This chart describes the categories of personal information that we collect in connection with our potential, current, or former work relationships.

Category of Personal Information and Representative Data Elements	Information About Collection, Use, and Disclosure (We also may use the data for the purposes included in Section 2)
<b>Contact information</b> <ul style="list-style-type: none"> <li>• Full name, previous names, and nicknames</li> <li>• Honorifics and titles</li> <li>• Home and work addresses</li> <li>• Email addresses</li> <li>• Contact mobile and other phone numbers</li> <li>• Emergency contact details</li> </ul> <p><i>Note: Contact Information may be categorized as "Identifiers", "Education Information" or "Personal Information" under the CPRA.</i></p>	<p>We use your contact information to communicate with you by mail, email, telephone, or text about your employment/engagement, including sending you work schedule information, compensation and benefits communications, and other company information. Contact information is also used to help us identify you and personalize our communications, such as by using your preferred name. We also may have contact information about your dependents and beneficiaries and will use such information consistently for the purposes for which it has been supplied to us.</p>
<b>Government-issued identification numbers</b> <ul style="list-style-type: none"> <li>• Social Security number</li> <li>• Driver's license number</li> <li>• Passport number</li> </ul>	<p>We use your government-issued identification numbers:</p> <ul style="list-style-type: none"> <li>• To identify you and to maintain the integrity of our HR records</li> </ul>

Category of Personal Information and Representative Data Elements	Information About Collection, Use, and Disclosure (We also may use the data for the purposes included in Section 2)
<ul style="list-style-type: none"> <li>• Benefits recipient numbers</li> <li>• Work visas</li> <li>• Other government-issued identifiers that may be used for compliance purposes (e.g., if you are a licensed professional, we may collect your license number)</li> </ul> <p><i>Note: Government-issued identification numbers may be categorized as "Identifiers" or "Education Information" under the CPRA.</i></p>	<ul style="list-style-type: none"> <li>• To enable employment verification and background screening, such as reference checks, license verifications, and criminal records checks, subject to applicable law</li> <li>• To enable us to administer payroll and benefits programs and comply with applicable laws, such as reporting compensation to government agencies as required by law</li> <li>• For security and risk management, such as collecting data for professional license verification, fraud prevention, or similar purposes</li> <li>• For other client business purposes, such as collecting passport data and secure flight information for employees/affiliates who travel</li> </ul>
<p><b>Biometric identifiers</b></p> <ul style="list-style-type: none"> <li>• Fingerprints from which an identifier template may be extracted</li> <li>• Facial recognition images from closed-circuit TV (CCTV) camera footage filmed in our U.S. locations</li> </ul> <p><i>Note: Biometric identifiers may be categorized as "Biometric Information" under the CPRA.</i></p>	<p>We use biometric identifiers to help us identify and authenticate you, for security and similar purposes (such as tracking access in our facilities).</p>
<p><b>Other unique identifiers</b></p> <ul style="list-style-type: none"> <li>• T. Rowe Price unique identification numbers (e.g., associate/contractor ID number, applicant number)</li> <li>• Any other identification or account/service numbers assigned by T. Rowe Price or by other parties in connection with HR or work functions (e.g., insurance card numbers, account number for a work-related publication you subscribe to)</li> </ul> <p><i>Note: Other unique Identifiers may be categorized as "Identifiers" or "Internet Information" under the CPRA.</i></p>	<p>We use unique identifiers (including your associate/contractor ID number) for internal record-keeping and reporting, including for data matching and analytics, and to track your use of company programs and assets.</p>
<p><b>Relationship information</b></p> <ul style="list-style-type: none"> <li>• Personal characteristics and information, such as your age, date of birth, gender, marital/ family status, or language preferences</li> <li>• Beneficiary and dependent information</li> <li>• Demographic data, including race, ethnicity, or sexual orientation data</li> <li>• Diversity program data</li> <li>• Biographical data relating to past roles, such as work history, business title, position type and level, reason(s) for leaving a job</li> <li>• Education and degree information</li> <li>• Information about a second job</li> <li>• Information about officer or director position you or a close family member has outside of T. Rowe Price</li> <li>• Household demographic data</li> <li>• Data from resumes/CVs</li> <li>• Data from social media profiles, such as Facebook, Twitter, LinkedIn, and similar platforms</li> <li>• Professional licenses, certifications and memberships and affiliations</li> <li>• Personal and professional skills and talents summaries (e.g., languages spoken, CPR certification)</li> </ul>	<p>We use relationship information to help us understand our employees and contractors and potential employees, and for professional and personal development. We also use relationship information to foster a creative, diverse workforce, for coaching, and to guide our decisions about programs and services. For example, we may tailor service programs to reflect our employees' commitment to different types of causes.</p>

Category of Personal Information and Representative Data Elements	Information About Collection, Use, and Disclosure (We also may use the data for the purposes included in Section 2)
<p>status, community service participation), interests and hobbies</p> <ul style="list-style-type: none"> <li>• Preferences related to religion (such as kosher meal requests, holiday leave requests)</li> <li>• Political opinion, PAC contribution data</li> <li>• Information provided for company social and professional networks (employee profile data), including alumni programs</li> <li>• Professional goals and interests</li> <li>• Travel preferences</li> <li>• Research/survey data</li> <li>• Other views you have shared with us</li> </ul> <p><i>Note: Relationship information may be categorized as "Professional or Employment Related Information," "Inferences," or "Education Information" under the CPRA.</i></p>	
<p><b>Inferred and derived information</b></p> <ul style="list-style-type: none"> <li>• Propensities and attributes</li> <li>• Scores generated by internal analytics programs or your device</li> </ul> <p><i>Note: Inferred and derived information may be categorized as "Professional or Employment Related Information," or "Inferences" under the CPRA.</i></p>	<p>We use inferred and derived information to better understand you, to assess and improve our HR functions, and for security and anti-fraud purposes.</p>
<p><b>Transaction and interaction information</b></p> <ul style="list-style-type: none"> <li>• Dates of employment</li> <li>• Application and hiring details (e.g., interview notes, reference checks)</li> <li>• Re-employment or re-engagement eligibility</li> <li>• Position, Title, Reporting Information</li> <li>• Work history information</li> <li>• Time and attendance records</li> <li>• Leave and absence records</li> <li>• Salary/payroll records (such as current and expected salary and benefits, bonus, hourly rate)</li> <li>• Benefit plan records for you and your beneficiaries and dependents (such as insurance, retirement plan, equity award, and other employee benefits)</li> <li>• Travel and expense records</li> <li>• Training plan records</li> <li>• Compliance records</li> <li>• Performance records and reviews</li> <li>• Disciplinary records</li> <li>• Gifts and entertainment records</li> </ul> <p><i>Note: Transaction and interaction information may be categorized as "Personal Information" under the CPRA.</i></p>	<p>We use transaction and interaction information as needed to manage our relationships and run our HR functions, such as scheduling work, providing payroll and benefits and managing the workplace.</p>

Category of Personal Information and Representative Data Elements	Information About Collection, Use, and Disclosure (We also may use the data for the purposes included in Section 2)
<p><b>Financial information</b></p> <ul style="list-style-type: none"> <li>• Bank account number and details, payment card information</li> <li>• Company-issued payment card information (and personal payment card/account information if provided for reimbursement), including transaction records</li> <li>• Information about securities holdings, transactions, and positions for you and close family members, (such as securities that you hold or can exercise control over, credit reports and credit scores and any non-public financial information.)</li> </ul> <p><i>Note: Financial information may be categorized as "Commercial Information" under the CPRA.</i></p>	<p>We use your financial information to facilitate compensation (such as for direct deposit and reimbursement of expenses), compliance purposes, and for security and fraud prevention.</p>
<p><b>Health information</b></p> <ul style="list-style-type: none"> <li>• Medical information for job placement, including drug testing and fitness to work examinations, accommodation of disabilities</li> <li>• Medical information for leave and absence management and workers' compensation programs</li> <li>• Wellness program data</li> <li>• Information pertaining to enrollment and utilization of health and disability insurance programs</li> <li>• Information collected in connection with occupational safety programs, such as information about accidents and illness incurred at work</li> </ul> <p><i>Note: Health information may be categorized as a "Protected Classification under California or federal law" under the CPRA..</i></p>	<p>We use your health information as needed to provide health and wellness programs, including health insurance programs, and for other employee benefits programs. We also use health information for internal risk management and analytics, such as in connection with our disabilities, workers' compensation, and workplace safety programs.</p>
<p><b>Online and technical information</b></p> <ul style="list-style-type: none"> <li>• System identifiers (e.g., usernames or online credentials)</li> <li>• Internet protocol (IP) address, MAC address, SSIDs and other device or persistent identifiers</li> <li>• Device characteristics (such as browser information)</li> <li>• Web server and application logs</li> <li>• Browsing data, first- and third-party cookies, Web beacons, clear GIFs, and pixel tags.</li> <li>• Records from access control devices, such as badge readers</li> <li>• Records from technology monitoring programs, including suspicious activity alerts</li> </ul> <p><i>Note: Online and technical information may be categorized as "Identifiers" or "Internet Information" under the CPRA.</i></p>	<p>We use online and technical information for system administration, technology and asset management, information security and cybersecurity purposes. We may also use this information to evaluate compliance with company policies. For example, we may use access logs to verify employee attendance records.</p>
<p><b>Audio and visual information</b></p> <ul style="list-style-type: none"> <li>• Photographs</li> <li>• Video images</li> <li>• Audio recordings (such as call center recordings, call monitoring records, recorded conference calls)</li> <li>• CCTV records</li> <li>• Voicemails</li> </ul>	<p>We may use this information for general relationship purposes, such as call recordings used for training, coaching or quality control. We use CCTV recording for premises security purposes and loss prevention. We may also use this information to evaluate compliance with company policies.</p>

Category of Personal Information and Representative Data Elements	Information About Collection, Use, and Disclosure (We also may use the data for the purposes included in Section 2)
<p><i>Note: Audio and visual Information may be categorized as "Audio, electronic, visual, thermal, olfactory, or similar information" under the CPRA.</i></p>	
<p><b>Internet of things (IoT) and sensor information</b></p> <ul style="list-style-type: none"> <li>• Data collected by “always on” devices (personal assistants)</li> <li>• Workplace sensors (such as to gage occupancy)</li> <li>• Other consumer-activated devices</li> </ul> <p><i>Note: IoT and sensor information may be categorized as "Internet or other Electronic Network Activity Information" under the CPRA.</i></p>	<p>We analyze and aggregate this data for workforce and space planning purposes, and to enable application functionality.</p>
<p><b>Geolocation information</b></p> <ul style="list-style-type: none"> <li>• Location or region you are in when you are using a company-issued device or when you use another device to interact with our digital systems or content or for telephone calls</li> <li>• Your location when you are on premises (e.g., from badge swipe data, mobile devices, or CCTV)</li> </ul> <p><i>Note: Geolocation information may be categorized as "Geolocation Data" under the CPRA.</i></p>	<p>We may use this information to provide physical security, information security and/or fraud prevention services.</p>
<p><b>Children’s information</b></p> <p>We collect children’s information pertaining to children from the parents or guardians of the children. We do not collect any personal information directly from children.</p> <ul style="list-style-type: none"> <li>• Child’s name, date of birth, Social Security number, and relationship to you as a beneficiary</li> <li>• Benefit program eligibility and enrollment records</li> </ul> <p><i>Note: Children’s information may be categorized as "Protected Classifications under California or federal law" under the CPRA.</i></p>	<p>We use children’s data to provide the benefits programs selected by an employee, and for related purposes, such as dependent verification, fraud prevention and utilization reviews.</p>
<p><b>Compliance information</b></p> <ul style="list-style-type: none"> <li>• Employment eligibility verification records, background screening records, and other record maintained to demonstrate compliance with applicable laws, such as payroll tax laws</li> <li>• Data rights requests and supporting documentation</li> <li>• Occupational safety records and worker’s compensation program records</li> <li>• Records of privacy and security incidents involving HR records, including any security breach notifications</li> <li>• Information obtained through reference checks and/or gathered under company policies</li> <li>• FINRA, broker-dealer, and bank affiliations for you and close family members</li> <li>• Records relating to complaints, investigations, incident details, and resolutions of such matters</li> <li>• Records maintained in connection with legal matters, litigation, or subject to legal holds</li> </ul> <p><i>Note: Compliance information may be categorized as "Professional or Employment-Related Information" or "Commercial Information" under the CPRA.</i></p>	<p>We use compliance data for internal governance, corporate ethics programs, institutional risk management, reporting, demonstrating compliance and accountability externally, and as needed for litigation and defense of claims.</p>



#### 4. Sensitive Personal Information

Some of the personal information described in Section 3 above also constitutes “sensitive personal information” under the CPRA. We use and disclose sensitive personal information for our HR, workforce, and compliance functions and for other legally authorized purposes. We do not use or disclose it in a manner that would give rise to a right to limit its use or disclosure under the CPRA.

Category of Sensitive Personal Information	Information About Collection, Use, and Disclosure (We also may use the data for the purposes described in Sections 2 and 3)
Government-issued identification numbers (social security, driver’s license, state identification card, or passport number)	We use and disclose this information for identification, compensation and benefits programs, compliance, and related purposes.
Account log-in credentials and financial account numbers (in combination with any required security or access code, password, access code, or credentials that permit access to an account)	We use and disclose this information to ensure security of our systems, for compensation (such as making direct deposit payments), security, compliance, and related purposes.
Precise geolocation	Some of the geolocation information described in Section 3 above may constitute precise geolocation under the CPRA (e.g., location within a radius of 1,850 feet). We may use or disclose this information to provide physical security, information security, and/or fraud prevention services.
Information about racial or ethnic origin, religious or philosophical beliefs	We use and disclose this information in connection with our diversity and social governance programs, as required by law, and as otherwise authorized by you (such as if participate in company-sponsored groups or self-id programs).
Contents of Mail, Email or Text Messages (unless T. Rowe Price is the intended recipient)	Non-work related mail sent to or from a T. Rowe Price location or communications sent or received using company devices or over company networks are subject to our policies (including monitoring policies), and contents of mail, email and texts may be accessed, used, and disclosed by T. Rowe Price for legitimate business purposes, including security and compliance purposes.
Biometric information	We use and disclose this information for access control, premises security, compliance, and similar purposes.
Health information	We use and disclose this information for employee health and benefits, occupational safety, compliance, and related purposes.
Information about sex life or sexual orientation	We use and disclose this information for employee benefits programs (such as providing benefits to same-sex partners), for diversity and social governance programs, and as otherwise authorized by you (such as if you participate in our PRIDE @ T. Rowe Price group).

#### 5. Disclosures to Service Providers, Contractors, and Third Parties

Your personal information is intended for T. Rowe Price and may be disclosed to T. Rowe Price affiliates and subsidiaries and, in certain circumstances, with other parties, including to other parties as directed by you. We do not disclose your personal information to other parties except as appropriate in the context of your relationship with us or as otherwise permitted by law.

We may disclose your personal information to:

- **T. Rowe Price's family of companies.** As the T. Rowe Price entity that you applied to or work for is part of a wider group of companies with headquarters in the U.S., and offices located across the globe, which all partially share management, IT, human resources, legal, compliance, finance, and audit responsibility, we may share your personal information among our family of companies, including our subsidiaries and affiliates.



We may also disclose your personal information with the following types of other organizations:

- **External auditors, accountants, legal, and other professional advisors.**
- **Our service providers.** We use other companies or contractors to perform services on our behalf or to assist us with the operation of T. Rowe Price products or business operations. For example, when you use our online portal to apply for employment, to correspond with us, or to perform a self-evaluation, the HR information database currently is operated by a service provider. While we may use a service provider to assist us in relation to any of the purposes for which we may collect personal information, they generally fit into one or more of the following categories of service providers:
  - Infrastructure and technology service providers.
  - Analysis, research, event, and communications providers; and
  - Providers of administrative services for T. Rowe Price, such as recruiting agencies, talent and educational services, benefits providers, and travel services.

In providing such services, these service providers may have access to your personal information. However, we will only provide our service providers with the information that is necessary for them to perform the services; they will act under our instructions, and we instruct them not to use your personal information for other purposes. We will always use our best efforts to ensure that all the service providers we work with will keep your personal information secure.

- **Other parties permitted by law.** In certain circumstances, we may be required to disclose your personal information to comply with a legal or regulatory obligation (for example, we may be required to disclose personal information to the police, regulators, government agencies, or judicial or administrative authorities). We may also disclose your personal information to other parties where disclosure is both legally permissible and necessary to protect or defend our rights, matters of national security, law enforcement, to enforce our agreements, or to protect your rights or those of the public.
- **Other parties in connection with ordinary business activities.** We may transfer your personal information, such as your business contact details, photo, and biographical information, to other parties with which we or another member within the T. Rowe Price family interact in the ordinary course of business, such as when you are included on an email with others or to confirm your details or role.
- **Other parties connected with business transfers.** We may transfer your personal information to other parties (including existing or newly-formed companies in the T. Rowe Price family of companies) in connection with a reorganization, restructuring, merger, acquisition, or transfer of assets, provided that the receiving party agrees to treat your personal information in a manner consistent with this Notice.

## 6. Your California Privacy Rights

This section applies solely to current or former employees or contractors, job applicants, and prospective employees or contractors who reside in California and for whom we have data that are subject to the CPRA. Any terms defined in the CPRA have the same meaning when used in this section.

- **Right to Know & Access.** You may have the right to confirm with us whether your personal information is processed and, if it is, to request access to that personal information, including the categories of personal information processed, the purpose of the processing, and the recipients or categories of recipients. We do have to consider the interests of others though, so this is not an absolute right and there are additional

exceptions under the CPRA. Also, we are not obligated to respond to more than two access requests for the same individual's personal information within a 12-month period.

- **Deletion.** You may have the right to ask us to erase personal information concerning you, except we are not obligated to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise, or defend legal claims, or under other exceptions under the CPRA.
- **Correction.** You may have the right to ask us to correct inaccurate personal information that we maintain about you. If you are a current T. Rowe Price employee, you can always access and update key aspects of your personal information by using the tools available on Workday.

If your request is for data relating to you that is de-identified or aggregated so that it is no longer personal information, we are not required to re-identify the data to respond to your request.

You have a right to receive nondiscriminatory treatment for the exercise of the privacy rights conferred by the CPRA.

Making your own privacy rights request: To exercise one or more of these rights, please contact us as explained below. Please note that we may need to verify your identity before we can fulfill your request.

- Use the online form at [troweprice.com/CCPA](https://troweprice.com/CCPA).
- Call us at 1-877 HR SERVE (1-877-477-3783)
- Email us at [benefits@troweprice.com](mailto:benefits@troweprice.com)

Authorized agent requests: A request also may be made by someone else you authorize specifically to make such a request under the CPRA or by someone you have named as your agent under a power of attorney that is valid under the California Probate Code. Click [here](#) for authorized agent instructions and appropriate forms.

Handling requests we receive: If we need additional information to verify your identity, we will let you know. We will endeavor to respond to a verified request no later than 45 days after receipt, unless there are grounds for extending our response timeframe by up to an additional 45 days. In the event of an extension, we will explain to you why the extension is necessary. In some cases, your ability to know/access, delete, or correct your personal information will be limited, as required or permitted by applicable law, even when the CPRA applies to the personal information we have for you. If we cannot fulfill your request because we cannot verify your identity or due to exceptions under the CPRA (or when the CPRA does not apply to the personal information), we'll let you know in our response.

## **7. Security of personal information:**

We have implemented technical and organizational security measures to safeguard personal information in our custody and control. Such measures we have implemented include limiting access to personal information only to employees, contractors, and authorized service providers who need to know such information for the purposes described in this Privacy Notice; training for our employees and contractors; as well as other technical, administrative, and physical safeguards. While we endeavor to always protect our systems, sites, operations, and information against unauthorized access, use, modification, and disclosure, due to the inherent nature of the internet as an open global communications vehicle and other risk factors, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others, such as hackers.

## **8. Data Retention:**

The retention periods for personal information vary depending on the nature of the business records in which the data elements are maintained. The criteria used to determine data storage are: (1) the length of time that the

record is needed for the purposes for which it was created, (2) the time the record is needed for other operational purposes, such as audits, reporting, data integrity, and cyber security purposes, and (3) the length of time the record is needed for legal compliance, including maintain of opt-out/in lists, legal defense, and legal holds.

#### **9. Effective Date and Changes to this Privacy Notice:**

The effective date of this Notice is January 1, 2023. We reserve the right to change our Notice from time to time. If we decide to make a material change to our Notice, we will endeavor to make you aware of that fact by, for example, notifying you of these changes via email and/or posting an alert on an applicable internal or external website. If we make a change that we are required by law to inform you of in other ways (such as by mail), we will do so.

#### **10. Contact us:**

If you have concerns or questions regarding this Notice, please use one of the following methods depending upon your relationship with T. Rowe Price:

- Use [MyHR](#) to submit an inquiry if you are a current employee
- Submit an inquiry via email to [benefits@troweprice.com](mailto:benefits@troweprice.com) if you are a former employee, current or former contractor, job applicant, or prospective employee or contractor