

# United Kingdom and European Union General Data Protection Regulation Privacy Notice

This Privacy Notice describes how Charles Schwab & Co., Inc.; Charles Schwab, U.K., Ltd.; Charles Schwab Futures and Forex LLC; and Schwab Wealth Advisory, Inc. (each a "Schwab affiliate"; together "Schwab," "we," "us," or "our") process personal data of individuals in the United Kingdom (U.K.) and European Economic Area (EEA). The information in this Privacy Notice is provided pursuant to the General Data Protection Regulation (GDPR) and related legislation in the EEA and the U.K. (including the U.K.'s Data Protection Act 2018 ["DPA"]) with regard to how we act as data controllers.

Individuals in the U.K. may exercise the rights outlined in this Privacy Notice by contacting us at Tel: 0203 795 2704 or [inquiry@schwab.com](mailto:inquiry@schwab.com) or by mail at Charles Schwab, U.K., Ltd. Attn: Compliance, 33 Ludgate Hill, London, EC4M 7NJ, United Kingdom.

Individuals in the EEA may exercise the rights outlined in this Privacy Notice by contacting us through our designated representative MCF Legal Technology Solutions Limited at Tel: +353 1 829 0000 or [schwab@mcf.ie](mailto:schwab@mcf.ie) or by mail at MCF Legal Technology Solutions Limited, Riverside One, Sir John Rogerson's Quay, Dublin 2, Ireland.

Contacting Schwab through other means could impact your rights and Schwab's obligations under applicable law.

We use cookies to capture information about your device or browser. If we determine that you reside in the U.K. or EEA, we will collect only necessary cookies unless you provide your consent using our consent management tool available on our website.

## Categories of Personal Data Collected and Processed

Depending on the products and services that you use, one or more Schwab affiliates collects and processes your personal data. Such personal data includes contact detail identifiers, biometric data, and other information necessary to verify your identity; internet or other network activity information; financial and commercial information and location-tracking information; biographical information, including professional and employment information; information necessary to provide products and services that you request; and personal data we are legally required to obtain under the GDPR or other applicable law.

We also may obtain personal information about you from other legitimate sources, including from our service providers and publicly available sources, to assist us in verifying your identity, providing our products and services to you, and complying with applicable laws.

## Bases for and Purposes of Data Processing

We collect and process your personal data when necessary for the performance of our contract with you, to take steps at your request before you enter into a contract with Schwab with your consent, to comply with applicable laws and/or when necessary for the purposes of personal data processing. Depending on the products and services you use or subscribe to, your contract is with one or more of the following Schwab entities identified in your contracts and account materials:

- Charles Schwab & Co., Inc. provides investment products and services, including Schwab brokerage accounts.
- Charles Schwab, U.K., Ltd. provides services to U.K. residents promoting and arranging the financial products and services provided by Charles Schwab & Co., Inc. in the U.S.

- Charles Schwab Futures and Forex LLC provides futures trading services.
- Schwab Wealth Advisory, Inc. provides wealth management advice.
- We also process your personal data for direct marketing purposes based on your consent. You maintain the ability to opt out of direct marketing from the Schwab entities with which you do business.

For further information about our privacy practices in the U.S., please review our Corporate Privacy Notice at [schwab.com/privacy](http://schwab.com/privacy).

Charles Schwab & Co., Inc. and Charles Schwab, U.K., Ltd. process the personal data of U.K. residents who receive services from Charles Schwab, U.K., Ltd. as joint controllers. This Privacy Notice, as adopted by both joint controllers, sets out their shared responsibilities and the essence of their joint-controller relationship. The joint controller against which you exercise your data protection rights is primarily responsible for ensuring that your data protection rights are respected. In any case, both joint controllers are responsible for assisting each other to the extent necessary for either or both joint controllers to comply with their obligations to you. You can communicate with either joint controller by contacting us through the communication methods provided at the beginning of this Privacy Notice.

## Sharing of Personal Data

We may share your personal data with affiliated entities and unaffiliated service providers to help conduct our business. These arrangements are subject to data protection agreements. We also may share your personal data with our affiliates for their everyday business purposes (information about your creditworthiness) and for our affiliates to market to you, and, in each case, you maintain the ability to opt out of our sharing of your personal data for these purposes. We may also share your personal data in connection with a merger, acquisition, corporate reorganization, or the sale of substantially all of an entity's assets, and with government authorities and regulators for purposes of this Privacy Notice.

Our service providers provide: (a) vendor services to facilitate and support the financial products and services we provide; (b) professional services, such as audit, accounting, and tax services; (c) public relations, including education and development services; (d) marketing and promotional event services; (e) market data and research; (f) network platform support services; (g) administrative services, such as printing and mailing; and (h) legal, governmental, and regulatory support (e.g., in connection with anti-money laundering and international trade sanction programs).

## International Transfers of Personal Data

Except for Charles Schwab, U.K., Ltd., the Schwab entities listed in this Privacy Notice are based in the U.S. Charles Schwab, U.K., Ltd. transfers personal data to Charles Schwab & Co., Inc. in the U.S. pursuant to appropriate safeguards for international transfers, including pursuant to Standard Contractual Clauses (SCCs) approved by the European Commission and/or the Information Commissioner's Office into which both entities have entered. If you engage Charles Schwab, U.K., Ltd. for services, your personal data will be transferred pursuant to the SCCs. You can request a copy of the SCCs by contacting us through the communication methods provided at the beginning of this Privacy Notice. If you engage directly with U.S. companies in the Schwab

group for products and services, transfers of personal data may be made as necessary for the performance of our contract with you, the implementation of pre-contractual measures taken at your request, or with your consent.

## Security of Personal Data

We use technical and organizational measures to protect the confidentiality, integrity, and availability of your personal information. To learn more about information security at Schwab, please visit [schwab.com/schwabsafe](https://schwab.com/schwabsafe).

## Data Storage Period

We process and store personal data for as long as is required to provide our products and services to you, or as otherwise required by applicable laws.

## Your Rights

You have certain rights with respect to your personal data. You can exercise or address these rights as allowed under applicable law, ask questions about our use of your personal data, or raise other issues or disputes by contacting us through the communication methods provided at the beginning of this Privacy Notice.

- 1. Access.** You have the right to obtain access to your personal data.
- 2. Rectification.** You have the right to ask for incorrect, inaccurate, or incomplete personal data of yours to be corrected.
- 3. Erasure.** You have the right to request that your personal data be erased.
- 4. Restriction on processing.** You have the right to request the restriction of the processing of your personal data in specific cases.
- 5. Objection to processing.** You have the right to object to the processing of your personal data for marketing purposes or on grounds relating to your particular situation.
- 6. Portability.** You have the right to receive your personal data in a machine-readable format and send it to another controller.
- 7. Withdrawal of consent.** You have the right to withdraw consent from Schwab's direct marketing.
- 8. Lodging a complaint with a Supervisory Authority.** You have the right to lodge a complaint, as applicable, with the U.K.'s Information Commissioner's Office or a Supervisory Authority within your EEA member state.

## Updates

We may update or change this Privacy Notice from time to time without advance notice. Should any new Privacy Notice go into effect, we will post it on our website. When we make changes, we will update the "Effective Date" at the bottom of this page. Any changes to this Privacy Notice will become effective when posted.

Effective Date: September 2023.