

CALIFORNIA CONSUMER PRIVACY ACT NOTICE AT COLLECTION

Last Updated: March 2021

Introduction

Boston Partners Global Investors, Inc., Boston Partners Securities, LLC, Boston Partners Trust Company, and Boston Partners (UK) Limited, (together, “Boston Partners,” “we,” “us,” or “our”) have built a reputation for integrity and professionalism among their current, prospective and former clients. We value the confidence and trust those clients have placed in us and strive to protect that trust by holding personal data in the strictest confidence. This Notice at Collection and Use of Personal Information (“Notice at Collection”) applies to California residents and describes the personal information that we collect as well as our purposes for using such information, in accordance with the California Consumer Privacy Act (along with any implementing regulations as may be amended from time to time, “CCPA”).

Terms used in this section have the meaning ascribed to them in the CCPA. We are a “business.” “Personal information” as used in this section has the same meaning as in the CCPA. It does not include deidentified information, aggregate consumer information or publicly available information, as those terms are defined in the CCPA.

Information We Collect

Depending on how you interact with us, we may collect certain categories of personal information from or about you including:

- identifiers and similar information such as, name, address, date of birth, email address, social security number, driver’s license number, tax identification number, passport number, online identifiers or other similar identifiers;
- additional information protected under certain federal or state laws such as a signature, education information, state identification number, credit card, bank account, assets, account balances, wire instructions, or other financial information;
- characteristics of protected classifications under certain federal or state laws, including gender, national origin, or marital status;
- certain information that may qualify as “special category” data under the GDPR such as information on trade union membership;
- commercial information, including records of products or services purchased, obtained, or considered, or other purchasing histories or tendencies, including funds in which you are invested, investments considered, or sources of wealth;
- internet or other electronic network activity information, including interactions with our website or use of certain online tools;
- audio, electronic, visual, or similar information;

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- professional or employment-related information, including investment experience, occupation, compensation, employer, and title; and
- inferences drawn from any of the information identified above to create a profile reflecting your preferences or similar information, including your potential interest in investing in new funds.

How We Use Collected Information

We may use your personal information for our business or commercial purposes such as:

- performing services on behalf of a fund, including fulfilling your requests, maintaining or servicing accounts, providing investor relations service, processing subscriptions, withdrawals and redemptions (as applicable), verifying information, processing payments, or providing similar services;
- communicating with you;
- performing our contractual and regulatory obligations to a subscriber to a fund, including providing updates on a fund's performance, providing tax reporting and other operational matters;
- detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity, including preventing fraud and conducting "Know Your Client," anti-money laundering, terrorist financing, and conflict checks;
- enabling or effecting commercial transactions;
- where permitted by applicable law, providing you with marketing or promotional materials;
- administering and improving our website; and
- internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

Further Information

For more information about our privacy practices, please review our Privacy Notice which is located at <https://www.boston-partners.com/>.

How to Contact Us

If you have any questions, comments or requests regarding this Notice at Collection, please contact us by calling 833-646-1409 or through our website by accessing the following link: <https://www.boston-partners.com/contact-us/>.