

LAST UPDATED: April 2023

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Introduction

This privacy notice explains how Merrill Lynch International QFC Branch (“we” or “our” or “us”), collects, uses, or discloses personal data online and offline in connection with the services we provide to our corporate and institutional clients as defined in the Processing Activities and Legal Basis section below. We refer to the individuals whose personal data (as defined below) we process, such as individuals who work for or are otherwise engaged by, or interact with, our corporate, institutional, and prospective clients, their affiliates or other third parties in connection with the services, as “you” in this notice. This notice also explains how we collect, use, share and protect personal data from registrants for events that these entities host. See relevant sections on event management and execution.

Personal Data We Collect

“**Personal Data**” is information that identifies an individual or relates to an identifiable individual. The table below contains a list of the Personal Data we collect. In the table in the section Processing Activities and Legal Basis, we have associated the categories of Personal Data we collect with the categories of our processing activities/processing purposes and relevant legal bases.

Categories of Personal Data	Description	Personal Data
Attendance Data	Confirmation of an individual's attendance at in-person or virtual events	Events attended
Biographies	Information pertaining to an individual’s work history, professional experience, languages spoken, and/or education	Job history, professional experience (including company names and titles), education (schools, degrees), languages spoken, photograph
Business Contact Data	An employee or customer's corporate contact information	Name, company, business address, business phone number, business email address
Place of Birth	Name of city and/or country of birth	Name of city and/or country of birth
Contact Details - Minors	Information pertaining to the contact information for a minor in relation to an event hosted by us	Name, relationship to attendee, dietary restrictions (if applicable)
Criminal Records	An individual's criminal records and/or convictions	Arrest records, arraignment details, behavior, criminal convictions
Date of Birth	An individual’s date of birth	Date of birth

Categories of Personal Data	Description	Personal Data
Dietary Data	Information regarding a person's dietary requirements	Dietary requirements (Note: religion may be inferred from a person's dietary requirements)
Disability Data	Information regarding a person's disabilities required to accommodate special needs	Disability data
Gender	Information regarding a person's gender	Gender
Voice	Recordings of voice	Voice on phone calls
Miscellaneous Data	Personal Data, as relevant to satisfy ad hoc regulatory, judicial, or law enforcement requests or obligations or as affirmatively provided by you in furtherance of the Services	Personal data, as defined by regulatory body, judiciary, or law enforcement or as otherwise affirmatively provided by you to us.
National Identifier	Information containing a person's country-specific National Identifier	Examples: European SSN, United Kingdom National Insurance Number, Ireland PPS numbers
Online Authentication Information	Information required to access an individual's personal account, online or through mobile applications	User ID, PIN/Password, IP address, challenge questions, device ID, mobile phone number
Online Identifier	A means of identifying an individual by associating informational traces an individual leaves when operating online	Cookies, pixel tags, web beacons, locally stored objects, unique device identifiers (for example Media Access Control (MAC) and Internet Protocol (IP) addresses, smart device information, mobile phone network information
Personal Contact Data	An individual's personal contact information	Name, alias, home address, home/personal phone number, personal email address
Proof of Address	Information found on utility bills and/or financial statements	Utility bills, financial statements
Signature	Any symbol, character, sound, or mark made by an individual with the intent to authenticate or authorize a transaction, agreement, or written or electronic document	eSignature, DocuSign, web signature, copy of written signature, ink signature
Unique Personal Identifier (Driver's License, Tax Identification Number)	Information containing a person's unique identifier for a driver's license or Individual Tax Identification Number	Driver's license number, ID issue date, ID expiration, Individual Tax Identification Number ("TIN")
Visa, Passport, Nationality and Citizenship Data	Information containing a person's visa, passport, nationality and/or citizenship data	Visa, passport copy, nationality, citizenship

Sensitive Information

We do not typically collect special categories of Personal Data as defined in the Personal Data Protection Law (e.g., information related to racial or ethnic origin, political opinions, religious, intellectual, or other beliefs, health data, biometrics or genetic data, credit data, criminal and security data, and data that indicates that one or both individual's parents are unknown) ("**Special Data**") in connection with the Services. Please do not send us any Special Data through the Services or otherwise, unless we specifically request this information from you or make a due diligence enquiry of you where the response necessitates you disclosing Special Data to us. In such a case, please ensure you notify us that you are providing Special Data.

We may receive Special Data from third party service providers and others in support of due diligence activities we undertake to satisfy various legal and regulatory requirements to which we are subject, such as negative news runs and enhanced due diligence reports performed related to anti-money laundering or know-your-customer requirements ("AML/KYC").

Event management and execution: At the time of registration, participants may tell us about disabilities that may require accommodation, or special needs related to religious beliefs, and/or health characteristics (e.g., dietary requirements). This

information will be used only to the extent necessary to facilitate any disability or special accommodations. Similarly, certain registration details may include Special Data (e.g., dietary restrictions may indicate a particular religious belief). Such Special Data will be used only to facilitate event participation.

Processing Activities and Legal Basis

We need to collect and process Personal Data in order to provide the requested services, or because we are legally required to do so. If we do not receive the information that we request, we may not be able to provide the requested services. The below table contains an indicative summary of our activities which require the processing of your Personal Data, and the associated legal basis. Unless otherwise stated, we collect Personal Data directly from the individual.

Your Personal Data will not be subsequently processed in a manner inconsistent with the Collection purpose, except for the following reasons:

- If the personal data is publicly available
- If not collecting the personal data would cause harm to the data subject or affect their vital interests
- If the collection is necessary to protect public health, public safety, public interest, or the life and/or health of a specific individual
- If the collected data is anonymized

If collection of the data is necessary to achieve the lawful interests of the controller or any other party, without prejudice to the rights or interests of the Personal Data Subject and provided that the Personal Data is not Sensitive Personal Data.

Purpose	Reasons for Processing	Categories of Personal Data	Legal Basis
<i>Anti-Money Laundering/ Know-your-Customer Requirements</i>	<ul style="list-style-type: none"> • To comply with applicable AML/KYC laws and regulations, including identifying beneficial owners, conducting background checks, monitoring, and performing other checks to meet anti-terrorism financing legal requirements. As required by applicable laws, this may involve processing your political affiliations, criminal convictions, or allegations of offenses. 	<p>Business Contact Data, Personal Contact Data, Date of Birth, Place of Birth, National Identifier, Visa, Passport, Nationality and Citizenship Data, Unique Personal Identifier (Driver's License, TIN), Signature, Proof of Address</p> <p>Sensitive Personal Data Criminal Records</p> <p>Third Party Source: internet search providers and database providers specialized in intelligence used to verify and authenticate identities and intelligence on financial crimes</p>	<p>Processing in accordance with another law: AML Law and its Implementing Regulations</p>
<i>Account Opening</i>	<ul style="list-style-type: none"> • To obtain all enterprise and regulatory requirements for your onboarding, expansion of services and account maintenance. • To obtain the necessary information to open accounts as required to enable your trading or other activities. 	<p>Personal Contact Data, Business Contact Data</p>	<p><i>Legitimate Interests</i> To capture and maintain accurate data for your accounts</p>

<i>Purpose</i>	<i>Reasons for Processing</i>	<i>Categories of Personal Data</i>	<i>Legal Basis</i>
<i>Regulatory and Compliance Obligations</i>	<ul style="list-style-type: none"> To comply with applicable laws and regulations (including any legal or regulatory guidance, codes, or opinions). To comply with sanctions procedures and other legal process and law enforcement requirements including any internal policies which are based on, or reflecting, legal or regulatory guidance, codes, or opinions. To comply with non-financial regulatory reporting requirements established by regulators, tax authorities and government bodies across jurisdictions. See Disclosure of Personal Data for additional information. 	Personal Data as relevant for each specific regulatory and compliance obligation.	Processing in accordance with another law: Capital Market Law and its Implementing Regulations
<i>Delivery of Global Banking and Global Markets Products and Services</i>	<ul style="list-style-type: none"> To contact nominated individuals in connection with existing transactions and contractual agreements. To validate authorized signatories when executing agreements. To compile working group lists for communication purposes. To respond to your enquiries and fulfil requests and contractual obligations and to administer account(s). To circulate transaction documents to you, such as trade confirmations or relevant agreements, or in amending trade terms. To arrange virtual or in-person roadshows or meetings with institutional investors in capital raising efforts. To authenticate your identity prior to granting access to certain websites, systems, or accounts. To assist in detecting and preventing fraud, identity theft and other risks to you or us. 	Business Contact Data, Online Authentication Information, Personal Contact Data, Online Identifier	<i>Legitimate interests</i> <ul style="list-style-type: none"> To provide services To authenticate individuals before giving access to systems or accounts To allow for communications required in respect of the services we provide

<i>Purpose</i>	<i>Reasons for Processing</i>	<i>Categories of Personal Data</i>	<i>Legal Basis</i>
<i>Delivery of our Global Transactions Services</i>	<ul style="list-style-type: none"> • If you are a Global Transaction Services client or a majority-owned affiliate of such that receives or has access to one or more forms of deposit-taking services, account services, treasury services, payment services, trade finance services and/or, supply chain finance services and/or referral arrangements, we further process Personal Data: <ul style="list-style-type: none"> ○ To administer those products or services in connection with fulfilling your instructions (e.g., Personal Data obtained through our relationship with you, the way you operate your accounts and/or services, such as the payments made to and from your accounts, services you ask us to provide to you, etc.). ○ To perform our regulatory obligations, such as compliance with the Funds Transfer Regulation and the Payment Services Directive. 	Personal Data of individuals related to or associated with you, our client (e.g., a beneficiary, counterparty, payee, employee, contractor, supplier etc.) such as their Personal Contact Data, Business Contact Data, Date of Birth, Place of Birth, National Identifiers, Gender, Nationality, Visa, Passport, Nationality and Citizenship Data, Online Identifier, Online Authentication Information	<i>Legitimate Interests</i> <ul style="list-style-type: none"> • For the purpose of, or as a result of, providing products and services to you or otherwise in connection with fulfilling your instructions • Where it is necessary in connection with any contract that you enter into with us (including prior to entering into such contract with us)
<i>Client Communications and Relationship Management</i>	<ul style="list-style-type: none"> • To directly communicate with you in order to help improve the products and services we provide, or in relation to a product or service in which you have expressed an interest, such as sharing of our case studies, capabilities materials, deal proposals, offers, market trends, insights, strategies, and trade ideas. • To handle your complaints. 	Business Contact Data	<i>Legitimate Interests</i> <ul style="list-style-type: none"> • To provide information to and to communicate with you regarding the services we provide or in relation to other services/products in which you have expressed an interest • To handle any complaints in relation to the services we provide

<i>Purpose</i>	<i>Reasons for Processing</i>	<i>Categories of Personal Data</i>	<i>Legal Basis</i>
<i>Events Management and Execution</i>	<ul style="list-style-type: none"> To register and confirm attendance at virtual or in-person events and conferences. To notify your organization about events for awareness, as part of our services to you. To facilitate event management, virtual or in-person. To facilitate special accommodations, including disabilities, dietary requirements, or other special needs 	Business Contact Data, Signature, Personal Contact Data, Contact Data – Minors, Attendance Data Sensitive Personal Data: Dietary Data, Disability Data	<i>Legitimate interest</i> <ul style="list-style-type: none"> To inform our internal event sponsor on attendance, and for gift ordering and entertainment booking To accommodate requirements of events attendees whenever possible <i>Consent</i> <ul style="list-style-type: none"> To obtain consent from parents or guardians when minors are attending
<i>Legal and Compliance</i>	<ul style="list-style-type: none"> To fulfil our legal and compliance-related obligations. To enforce our terms and conditions. To protect our operations. To protect our rights, privacy, or our property. To allow us to pursue available legal remedies, defend claims and limit the damages that we may sustain. 	Personal Data as relevant for each specific legal action, regulatory investigation, and/or other legal processes in question	<i>Legal obligations</i> <ul style="list-style-type: none"> Such as complying with legal processes. <i>Legitimate interests</i> Such as enforcing terms and conditions, protecting trademarks and bringing or defending legal claims.

Cookies and Similar Technologies

We may collect personal information through the use of cookies and similar technologies. See our [Cookie Policy](#) for additional details about cookies and tracking technologies including how you can manage cookies.

Disclosure of Personal Data

Personal Data may be disclosed to affiliates and third parties in connection with the Services we are providing. The recipients of any such information will depend on the Services that are being provided. Subject to any restrictions around confidentiality we have expressly agreed with you or other transaction parties, such disclosures may include disclosures made to categories of third parties listed in the table below:

Categories of third parties	Personal Data	Purpose of processing your Personal Data	Destination Countries
Communication and Collaboration Software and Software Services providers who enable individuals and teams to work together over geographic distances by providing tools that aid communication, collaboration and the process of problem solving (includes appliances, maintenance, and support services.)	Business Contact Data	To service your accounts and share transaction documents with you	Globally where we have presence Bank of America Locations

Categories of third parties	Personal Data	Purpose of processing your Personal Data	Destination Countries
External law firms	Personal Data as relevant in each specific situation	To provide legal support in preparing transactional documents with you, in support of the services we provide to you, or in defending claims involving you	Globally where we have presence Bank of America Locations
Regulators	Personal Data as relevant in each specific situation	To comply with regulatory requirements that obligate us to share your Personal Data	In jurisdictions subject to regulatory oversight and non-financial regulatory reporting requirements
Tax Service Providers who assist us on tax rules and regulations, including legal analysis, technical calculations, form preparation, planning and controversy management associated with meeting our local and international tax obligations.	Business Contact Data, Personal Contact Data, National Identifier, Date of Birth, Place of Birth, Visa, Passport, Nationality and Citizenship data	To comply with the Foreign Account Tax Compliance Act (“FATCA”) & Client Relationship Summary (“CRS”) related tax reporting requirements that obligate us to share your Personal Data	Globally where we have presence Bank of America Locations
Account Management Software Service Providers who help us with the management of financial accounts and processes with tools and controls that support our organizational, operational, and legislative requirements (includes maintenance and support services.)	Business Contact Data	To help process invoices and statements to you on services we provided or transactions we conducted with you	Globally where we have presence Bank of America Locations
Digital Commerce and Payment Services providers who enable you to conduct transactions online and via mobile devices	Business Contact Data, Online Authentication Information, Online Identifier	If you are a client of Global Transaction Services, to authenticate you when you log into online portals, to access your account, to review and conduct your transactions	Belgium, Hong Kong, Netherlands, Switzerland, United States
Banks with which we have made arrangements to enable us to provide the Services to you	Your information relating to you or your accounts with us or your relationship with us as is necessary to enable us to provide you with the services	To allow our partner banks to process payments to or from individuals related to your account with us in places where we do not have a presence, or we are unable to provide the relevant services	Denmark, Finland, Latvia, Norway, Sweden
Corporate Business Application vendors who provide software and software services to support our Global Banking and Global Markets businesses, including technology for Sales and Trading	Business Contact Data	To send you service or transactional emails or communications, as applicable and appropriate.	United States, United Kingdom

Categories of third parties	Personal Data	Purpose of processing your Personal Data	Destination Countries
functions within Global Equities, Fixed Income Currency and Commodities, Global Research and technology for Credit, Cash Management, FX, Equipment Finance and Merchant Services within Global Banking			
Digital Process Automation Software Services Providers who automate and digitize our transaction documentation workflow	Signature, Business Contact Data	To enable you to review and sign contracts with us electronically	United States
Tax Authorities	Business Contact Data, Personal Contact Data, National Identifier, Date of Birth, Place of Birth, Visa, Passport, Nationality and Citizenship data	To share your Personal Data in order for us comply with FATCA, CRS and other tax-related reporting requirements	Belgium, France, Germany, Greece, Hong Kong, Ireland, Italy, Netherlands, Qatar, Spain, Switzerland, United Arab Emirates, United Kingdom, United States
Third parties in connection with a sale or business transaction	Dependent on the specific sale or business transaction	We have a legitimate interest in disclosing or transferring your Personal Data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings). You will be notified of any such business transaction and of possible changes to the processing of your Personal Data in accordance with applicable law.	Dependent on the sale or business transaction
Hotels, Restaurants, Virtual event platforms, Transportation Companies, and Corporate Security	Business Contact Data, Personal Contact Data Dietary and Disability Data	To assist with our events management and execution	Globally where we have presence Bank of America Locations

Third Party Services

This Privacy Notice does not address, and we are not responsible for, the privacy information or other practices of any third parties, including any third party operating any website or service to which the Services link. The inclusion of a link does not imply endorsement of the linked site or service by us or by our affiliates.

Security

We seek to use reasonable organizational, technical, and administrative measures to protect Personal Data within our organization. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please immediately notify us in accordance with the “Contacting Us” section below.

Choices and Access

Receiving electronic communications from us

If you no longer wish to receive marketing-related emails from us in the future, you may opt-out by following the instructions in the relevant electronic communication or contacting your relationship manager.

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative and Service or transaction-related messages, which you cannot opt out of.

Rights of individuals afforded to you under Personal Data Protection Law

You may have certain rights under the Personal Data Protection Law regarding your access to, information about, or the processing of your personal data. These rights include, subject to certain exceptions:

- The right to be informed, which means we tell you what personal data we process, why we process your personal data, and with which third parties we share your personal data;
- The right to access, which is your right to see the personal data that we have about you;
- The right to rectification, which is your right to have your personal data corrected or amended if it is incorrect;
- The right to erasure, which means you may request that we delete the personal data we have about you;
- The right to request the Destruction of your Personal Data held by Us as the Controller if legally permissible
- The right to data portability, which is your right to ask for a copy of your personal data in a commonly-used machine-readable format;
- The right to object to further processing of your personal data in a manner that is inconsistent with the primary purpose of its initial collection; and
- The right to withdraw your consent if the processing of your personal data is based on your consent

To learn more about how you can exercise your rights, please see the section below.

How individuals can access, change, or suppress their Personal Data

If you would like to request to access, correct, update, suppress, restrict or delete Personal Data, object to or opt out of the processing of Personal Data, withdraw your consent (which will not affect the lawfulness of processing prior to the withdrawal) or if you would like to request to receive an electronic copy of your Personal Data for purposes of transmitting it to another company (to the extent the right to data portability is provided to you by applicable law), you may contact us by emailing: individualrightsrequests@bofa.com. We will respond to your request consistent with applicable law.

In your request, please make clear what Personal Data you would like to have changed, whether you would like to have the Personal Data suppressed from our database or otherwise let us know what limitations you would like to put on our use of the Personal Data. For your protection, we may only implement requests with respect to the Personal Data associated with the particular email address that you use to send us your request, and we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

You may lodge a complaint with the Competent Authority where you have your habitual residence or place of work or where an alleged infringement of applicable data protection law occurs.

Retention Period

We will retain Personal Data for as long as needed or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine our retention periods include: (i) the length of time we have an ongoing relationship with our client and provide the Services; (ii) whether there is a legal obligation to which we are subject; and (iii) whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).

The appropriate retention period is determined on a case-by-case basis and will depend upon the length of time we need to keep your Personal Data for the purpose(s) for which it was collected. For instance, we may need to retain your Personal Data to provide our client(s) with services, to comply with a legal obligation to which we are subject or in situations where retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation, or regulatory investigations). The retention period may vary between jurisdictions. For example, Personal Data processed for the purposes of meeting our legal and regulatory obligations related to the prevention of money laundering and terrorist financing (as described below) is retained for up to 20 years from the date it is received by the Bank or for up to 10 years from the end date of the client relationship, depending on the jurisdiction.

For example:

- We are required to retain certain Personal Data to deliver services to our clients at least until the termination of the relationship, and sometimes for a period of time thereafter;
- We preserve your Personal Data where it is reasonably necessary for reasons related to a legal claim or complaint, where we are subject to a regulatory investigation or where we may need to defend ourselves in legal proceedings or respond to a regulator or to respond to a valid legal request, such as a preservation order, subpoena, or search warrant;
- We keep information collected using Cookies in accordance with the [Cookie Policy](#);

We are required to retain certain Personal Data in order to meet our legal and regulatory obligations related to the prevention of money laundering and terrorist financing, and this information is retained in accordance with applicable money laundering laws.

Use of Services by Minors

The Services are not directed to individuals under the age of eighteen (18), and we do not knowingly collect Personal Data from individuals under 18.

Individuals may submit Personal Data about their minor children or legal wards in relation to attendance at or participation in an event. Individual parents or guardians must have the legal authority to disclose such Personal Data to us and make decisions related to processing of such Personal Data in connection with the event. This Personal Data of minors will only be used for event registration and participation purposes.

Jurisdiction and Cross-Border Transfer

Personal Data may be stored and processed in any country where we have facilities or in which we engage service providers, including the United States. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access Personal Data. Where possible we will use adequacy as defined by the QFC Data Protection Office. Where adequacy is not available, we rely on Article 24 of the QFC Data Protection. For a copy of applicable safeguards surrounding data transfers, please contact our Data Protection Officer at dpo@bofa.com.

Updates to This Privacy Notice

We may change this Privacy Notice from time to time. The "LAST UPDATED" legend at the top of this Privacy Notice indicates when this Privacy Notice was last revised. Any changes will become effective when we post the revised Privacy Notice. Use of the Services following these changes (or your continued provision of Personal Data to us) signifies acceptance of the revised Privacy Notice.

Contacting Us

For more information or to file a complaint, you may contact our Data Protection Officer at dpo@bofa.com. You can also direct questions to your relationship manager.

You can also find contact details for our Affiliates by following this link:
https://business.bofa.com/content/boaml/en_us/contactus.html