

## California Consumer Privacy Act ("CCPA" or the "Act")

This document provides specific information for California Consumers, as required under California privacy laws, including the California Consumer Privacy Act ("CCPA"). California privacy law requires that Gateway Investment Advisers, LLC (Gateway) provide California Consumers information about how we use their personal information, whether collected online or offline, and this document is intended to satisfy that requirement.

Under the CCPA, "personal information" is any information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular Consumer or household. We collect personal information through, 1) direct interaction with you and/or your agents, 2) account opening or updating documentation, 3) account custodian documentation, 4) consultants; and 5) our business relationship with you.

### Categories of Personal Information that We Collect, Disclose, and/or Sell

While our processing of personal information varies based upon our relationship and interactions with you, the table below identifies, generally, the categories of personal information about California Consumers that we collect, as well as the categories of third parties to whom we may disclose such information for a business or commercial purpose in order to provide the investment management services for which we have been engaged.

<b>Categories of personal information</b>	<b>Categories of Third Party Disclosures</b>
<b>Identifiers</b> such as a real name, postal address, email address, account name or other similar identifiers.	<ul style="list-style-type: none"><li>• <i>broker-dealers</i></li><li>• <i>custodians</i></li><li>• <i>proxy advisors</i></li><li>• <i>service providers</i></li><li>• <i>affiliates</i></li><li>• <i>others as required by law.</i></li></ul>
<b>Customer records</b> such as signature, telephone number employment, or financial information	<ul style="list-style-type: none"><li>• <i>service providers</i></li><li>• <i>custodians</i></li><li>• <i>affiliates</i></li><li>• <i>others as required by law</i></li></ul>

Categories of personal information	Categories of Third Party Disclosures
<b>Commercial information</b> , including records of products or services purchased, obtained, or considered.	<ul style="list-style-type: none"> <li>• <i>affiliates</i></li> <li>• <i>service providers</i></li> <li>• <i>others as required by law</i></li> </ul>
<b>Professional information</b> including professional or employment-related information, such as your employer and title when you engage with us for a business purpose.	<ul style="list-style-type: none"> <li>• <i>affiliates</i></li> <li>• <i>service providers</i></li> <li>• <i>others as required by law</i></li> </ul>
<b>Sensitive Personal Information</b> such as your financial account information.	<ul style="list-style-type: none"> <li>• <i>broker-dealers</i></li> <li>• <i>custodians</i></li> <li>• <i>proxy advisors</i></li> <li>• <i>others as required by law</i></li> </ul>

### Sales and Sharing of Personal Information

California privacy laws define a "sale" as disclosing or making available to a third-party personal information in exchange for monetary or other valuable consideration, and "sharing" broadly includes disclosing or making available personal information to a third party for purposes of cross-context behavioral advertising. Gateway DOES NOT sell or share Consumer's personal information.

### Sources of Personal Information

In general, we may collect personal information from the following categories of sources:

- Directly from the individual
- Government entities
- Business customers
- Affiliates
- Business partners

### Purposes of Collection, Use, and Disclosure

- Services and support. To provide and operate our services, communicate with our business customers about their use of the services, respond to inquiries, fulfill requests, process payments, communicate, and for similar service and support purposes.
- Marketing and advertising. For marketing and advertising purposes. For example, to send you information about our services and other marketing content, as well as any other information that you request as a result of your professional engagement with us.

- Security and protection of rights. To protect the services and our business operations; to protect our rights or those of our stakeholders; to prevent and detect fraud, unauthorized activities and access, and other misuse; where we believe necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety or legal rights of any person or third party.
- Legal proceedings and obligations. To comply with the law and our legal obligations, to respond to legal process and related to legal proceedings.

General business and operational support. To consider and implement mergers, acquisitions, reorganizations, bankruptcies, and other business transactions such as financings, and related to the administration of our general business, accounting, auditing, compliance, recordkeeping, and legal functions.

## **Sensitive Personal Information**

We only use and disclose sensitive personal information as reasonably necessary (i) to perform our services requested by you, (ii) to help ensure security and integrity, including to prevent, detect, and investigate security incidents, (iii) to detect, prevent and respond to malicious, fraudulent, deceptive, or illegal conduct, (iv) to verify or maintain the quality and safety of our services, (v) for compliance with our legal obligations, (vi) to our service providers who perform services on our behalf, and (vii) for purposes other than inferring characteristics about you. We do not use or disclose your sensitive personal information other than as authorized pursuant to section 7027 of the CCPA regulations (Cal. Code. Regs., tit. 11, § 7027 (2022)).

## **Retention**

We retain the personal information we collect only as reasonably necessary for the purposes described above or otherwise disclosed to you at the time of collection. For example, we will retain your Identifiers, Customer Records, Commercial Information, Personal Information and Sensitive Personal Information for our tax, accounting, and record keeping obligations as well as an additional period of time as necessary to protect, defend or establish our rights, defend against potential claims, and comply with legal obligations.

## California Consumers' Rights

Under the CCPA, California residents have the following rights (subject to certain limitations):

- **Opt out of sales and sharing:** the right to opt-out of our sale and sharing of their personal information. As noted above, Gateway does not share or sell personal information, thus this right is not available to California residents.
- **Limit use and disclosure of sensitive personal information.** The right to limit our use or disclosure of sensitive personal information to those authorized under the CCPA.
- **Deletion.** The right to the deletion of their personal information that we have collected, subject to certain exceptions.
- **To know/access.** The right to know what personal information we have collected about them, including the categories of personal information, the categories of sources from which the personal information is collected, the business or commercial purpose for collecting, selling, or sharing personal information, the categories of third parties to whom we disclose personal information, and the specific pieces of personal information we have collected about them.
- **Correction.** The right to correct inaccurate personal information that we maintain about them.
- **Non-discrimination.** The right not to be subject to discriminatory treatment for exercising their rights under the CCPA.

### ***Submitting Requests.***

California residents may submit CCPA requests to access/know, correct and delete their personal information maintained by us through our [California Consumers' Rights Form](#), by contacting us at 1.800.354.6339 (toll free), or by contacting your client service representative.

We will take steps to verify your request by [(i) sending you an email confirmation link which you must click to confirm your request; and (ii)

matching the information provided by you with the information we have in our records. You must complete all required fields on our webform (or otherwise provide us with this information via the above toll-free number) to verify your request. We will process your request based upon the personal information in our records that is linked or reasonably linkable to the information provided in your request. In some cases, we may request additional information in order to verify your request or where necessary to process your request. If we are unable to adequately verify a request, we will notify the requestor.

Authorized agents may initiate a request on behalf of another individual by using our [California Consumers' Rights Form](#). Authorized agents will be required to provide proof of their authorization and we may also require that the relevant consumer directly verify their identity and the authority of the authorized agent.