

# PRIVACY POLICY

Last Updated: October 23, 2023

This Privacy Policy describes the data privacy practices of Structured Finance Industry Group d/b/a Structured Finance Association (including current and future affiliates and subsidiaries, “SFA”, “we”, “our”, or “us”) with respect to the person accessing (“you” or “your”) our websites ([www.structuredfinance.org](http://www.structuredfinance.org) and [www.structuredfinancecoalition.org](http://www.structuredfinancecoalition.org)) and/or any related mobile sites, applications, or features (including those used during our sponsored in-person or virtual events) (each an “Event”), as well as any other personal information obtained when you call, email, or otherwise interact with SFA, including without limitation, at our Events (collectively, the “Sites”). We are committed to protecting the privacy of those who entrust us with their Personal Information. “Personal information” means any information pertaining to an identified or identifiable individual and may include, for example, email addresses and contact details and any similar information provided to us in the course of our business operations. Our users trust and expect that we will protect their Personal Information in accordance with the promises we make. This Privacy Policy includes Personal Information that is collected via email, SMS, telephone, and other means. Personal information that is de-identified or anonymized is not considered Personal Information.

By visiting the Sites, attending an Event, or otherwise interacting with us, you are accepting the practices described in this Privacy Policy. We recommend that you review this Privacy Policy periodically, as it may be updated from time-to-time. If you do not agree to the policy, please do not use the Sites or attend an Event.

## 1. Information Collection Overview

For the 12-month period prior to the date of this Privacy Policy, we explain here what categories of Personal Information we have collected in the usual course of business from users of the Sites, where we got it from, and with whom we have shared it:

Category of Personal Information Collected	Source	Purpose for Collection	Categories of Recipients
<b>Contact information:</b> your first and last name, mailing address, email address, and phone number.	From you when you register for or enroll in the Sites or an Event, place an order, sign up for our newsletter, sign up for an Event (either directly or via an Event sponsor), contact us, or participate in a Sites promotion or survey.	To communicate with and to help us improve our Sites for you; to respond to your inquiries; to communicate with you about an Event; to organize an Event; to provide you with the Sites; to inform you about additional Sites that may be of interest to you; to contact you with newsletters and other promotional materials from us and third party marketing offers from our trusted partners; to contact you with the Sites’ updates; to monitor compliance with the Sites’ terms of use; and legal obligation purposes.	Our affiliates, agents and successors; to the extent relevant, select marketing, technical and other service providers (who perform certain services and functions on our behalf and who are bound by confidentiality obligations).
<b>Submissions:</b> such as information you entered into any portal, environment or communication tool available on or through the Sites. We do not ask for, and you should not enter, your full	From you when you input information into any such portal, environment or tool.	To collaborate and communicate, as contemplated by such portal, environment or tool.	Users who are authorized to view or use such portal, environment or tool (or the applicable portion thereof) or to whom such information is communicated or

name anywhere in such portal, environment or tool.			designated; our affiliates, agents and successors; and, to the extent relevant, select technical and other service providers (who perform certain services and functions on our behalf and who are bound by confidentiality obligations).
<b>Payment information:</b> name, card issuer and card type, credit or debit card number, expiration date, CVV code and billing address.	From you and your payment card issuer.	To check that the right person is using the right card or account, meet the requirements of the card brands or account issuers, and to make sure we are paid for what you buy.	Our service providers who process payments for us; these service providers are prohibited from using Personal Information for any other purpose and are contractually required to comply with all applicable laws and requirements, which may include Payment Card Industry Data Security Standards if they are processing payments for SFA.
<b>Legal information:</b> fraud checks or flags raised about your transactions, the payment card you want to use, payment card refusals, suspected crimes, complaints, claims and accidents.	From you, the police, crime and fraud prevention agencies, payment card providers, the public, regulators, your and our professional advisors and representatives.	To protect you, other customers and our business against criminal activities and risks, make sure we understand and can meet our legal obligations to you and others and can defend ourselves.	Our service providers who help us with fraud protection and credit risk reduction, law enforcement and other governmental authorities in accordance with applicable law.
<b>Browsing information:</b> such as log information about your use of the Sites, including the type of browser you use, access times, pages viewed, your IP address and the page you visited before navigating to our Sites.	From you and from our Sites technology's interaction with your browser or devices.	<p>To make sure our Sites work properly with your device and make sure you can see and use our intended Sites on the device you are using, and for analytical and demographic purposes and to provide offers that may be of interest to you.</p> <p>We also will use this information to protect the security or integrity of the Sites and our business, such as by protecting against and preventing fraud, unauthorized transactions, and managing risk exposure, including by identifying potential hackers and other unauthorized users.</p>	Our service providers who help us with fraud protection, and third party vendors and other service providers that perform website analytic services for us.

<b>Location information:</b> such as details on your location while attending an Event.	From radio frequency technology-enabled badges provided by us at our Events that send and receive radio frequency signals through a small antenna in the device (" <b>Badges</b> ").	Each Event attendee may be issued a Badge, which will allow us to record real time attendance so Event attendees don't have to wait in line to check-in to sessions; to track when Event attendees enter or leave a session as well as when they access other areas of the Event.	Our service providers who perform certain technical services and functions on our behalf and who are bound by confidentiality obligations.
<b>Images, video, audio:</b> recorded audio, video or still photographs of you collected during an Event.	You and from video, photography, or audio devices used by us or our service providers during an Event.	For SFA's promotional and educational purposes.	Our service providers who perform certain video, photography and audio services and functions on our behalf and who are bound by confidentiality obligations.

SFA will only use Personal Information to the extent it is necessary to deliver the Sites and. In some jurisdictions, individuals may have the right to withdraw consent from certain uses. If you reside in such jurisdictions, you may have additional rights which are detailed in this Privacy Policy. In all cases, any service providers will be contractually limited in the way they may use Personal Information maintained by SFA, including requirements that such information be maintained in a confidential and secure manner.

**In Connection with Business Transfers:** In the event that a division, a product or all of SFA is bought, sold or otherwise transferred, or is in the process of a potential transaction, personal information will likely be shared for evaluation purposes and included among the transferred business assets, subject to client contractual requirements and applicable law.

**To Comply with Laws:** SFA may also disclose specific Personal Information when such disclosure appears necessary to comply with applicable law, a subpoena in the course of managing a dispute, governmental inquiry or other litigation process. We may also disclose information to our accountants, auditors, agents, lawyers and other advisors in connection with the enforcement or protection of our legal rights or to protect the interests or safety of our clients, employees or others, in accordance with or as authorized by law.

## 2. Cookies

Like many commercial websites, we analyze how visitors use our Sites through what is known as "cookie" technology. A cookie is a small text file that is placed on your computer when you access the Sites and allows us to recognize you each time you visit the Sites. We may use cookies to: (1) allow you to use the Sites without having to re-enter your user name and password; (2) enhance or personalize your Sites usage; (3) monitor the Sites usage; (4) manage the Sites; and (5) improve the Sites and our products and Sites, including providing you with interest-based ads. For more information on our advertising, see below: "Interest-Based Advertising." If you choose, you can set your browser to reject cookies or you can manually delete individual cookies or all of the cookies on your computer by following your browser's help file directions. However, if your browser is set to reject cookies or you manually delete cookies, you may have some trouble accessing and using some of the pages and features that are currently on our Sites, or that we may put on our Sites in the future. Note that browser-management tools for cookies are outside of our control and we cannot guarantee their effectiveness.

We may also use web beacons on the Sites, in our emails, and in our advertisements on other websites. Web beacons are tiny graphic images that are used to collect information about your visit to the Sites, such as the pages you view and the features you use, as well as information about whether you open and/or act upon one of our emails or advertisements. We may also collect the URL of the website you visited immediately before coming to the Sites. Web beacons help us analyze our Sites visitors' behavior and measure the effectiveness of the Sites and our advertising. We may work with service providers that help us track, collect and analyze this information.

SFA may use Google Analytics to evaluate use of the Sites for our internal purposes such as evaluating usages of the Sites. To learn how Google Analytics collects and processes data, please visit: "How Google uses data when you use our partners' sites or apps" located at [www.google.com/policies/privacy/partners](http://www.google.com/policies/privacy/partners)

We may combine the information we collect through cookies and web beacons with other information we have collected from you or information from other sources.

### **3. Interest-Based Advertising**

We may use third-party advertising companies that use tracking technologies to serve our advertisements across the Internet. These companies may collect information about your visits to the Sites and other websites and your interaction with our advertising and other communications. These advertising companies serve ads on behalf of us and others on non-affiliated sites, and some of those ads may be personalized, meaning that they are intended to be relevant to you based on information collected about your visits to the Sites and elsewhere over time. Other companies may also use such technology to advertise on our Sites.

You have the choice to tell us not to collect and use this information, and in some jurisdictions, we will only engage in interest-based advertising if you opt-in. If you would like more information about this practice and to know your choices concerning interest-based ads, visit:

<http://www.networkadvertising.org/choices/>

[www.aboutads.info/choices](http://www.aboutads.info/choices)

In Canada, please visit: <http://youradchoices.ca/choices/>

In the EU, please visit: <http://www.youronlinechoices.eu/>

### **4. Access, Correction, & Deletion**

The legal basis for processing your Personal Information is for our delivery of and your access to the Sites. We will only process your Personal Information with your consent when we have asked for it and you have provided it either directly or indirectly via an Event sponsor to us. We respect your right to access and correct your Personal Information. You may access your Personal Information by signing into your account. From there, you can correct or modify your information. You may also exercise your rights, subject to applicable laws, to request that we delete or restrict access to your Personal Information at any time. We may need to retain it for legally permitted purposes and this will be explained to you if necessary.

If you need assistance correcting or updating your Personal Information, or would like to request that we delete your Personal Information, please contact us using the contact information detailed in the "How to Contact Us" section below.

### **5. Retention of Personal Information**

Personal Information that we collect, access or process will be retained only as long as necessary for the fulfilment of the purposes for which it was collected, unless otherwise provided in agreements between you and SFA or as required or authorized by law. Personal Information that is no longer required to fulfill the identified purposes will be destroyed, erased or made de-identified.

### **6. Opt-Out**

At any time while accessing our Sites, any user while online may decline participation in any activity that asks for information (e.g., survey email, ecommerce). Your choice not to participate will in no way affect your ability to use any other feature on the Sites.

If you do not wish to receive communications from us about special offers and promotions, you can opt-out of receiving these communications by following the instructions contained in the messages you receive. Even if you opt-out of receiving these messages, we reserve the right to send you certain communications relating to the Sites we provide, and we may send you service announcements and administrative messages. We do not offer you the

opportunity to opt-out of receiving those communications. For more information about interest-based advertising, including how you can manage advertising, please see below "Interest-Based Advertising."

## **7. Security**

SFA has implemented a number of security features throughout the Sites to prevent the unauthorized release of or access to Personal Information. For example, database information is kept separate from live servers and is firewall protected. Please be advised, however, that although SFA has endeavored to create a secure and reliable site for you, the confidentiality of any communication or material transmitted to or from SFA via the Sites or e-mail cannot be guaranteed. When disclosing any Personal Information, you should remain mindful of the fact that it is potentially accessible to the public and consequently, may be collected and used by others without your consent. SFA has no responsibility or liability for the security of information transmitted via the Internet.

## **8. Third Party Websites**

The Sites may contain links to third-party websites, such as social media sites like LinkedIn, Facebook, Twitter, Instagram, TikTok and others which may have privacy policies that differ from our own. We are not responsible for the activities and practices that take place on these websites. Accordingly, we recommend that you review the privacy policy posted on any external site before disclosing any Personal Information. Please contact those websites directly if you have any questions about their privacy policies.

## **9. Children**

The Sites are not directed to children, nor do we knowingly collect any Personal Information from children under the age of thirteen without verifiable parental consent. If you believe that a child has provided Personal Information to us, please contact us promptly as described below, and we will endeavor to investigate and delete such information from our systems.

## **10. State Specific Rights**

If you are a resident of California, Colorado, Connecticut, Utah, or Virginia, the law in your state provides you with the following rights with respect to your personal information:

- The right to know what personal information we have collected, used, disclosed, and sold about you, 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 Amygdala discloses personal information, and the specific pieces of personal information Amygdala has collected about you.
- The right to obtain a copy of personal information we have obtained about you in a portable and, to the extent technically feasible, readily usable format.
- The right to correct inaccurate personal information about you, taking into account the nature of the personal information and the purposes of the processing.
- The right to request that we delete any personal information we have about you.
- If we deny your request, the right to appeal our decision.

In addition, and as set forth below, California law requires us to identify, for the 12-month period prior to the date of this Privacy Policy, what information we may have "sold" or "shared" about you. For the 12-month period prior to the date of this Privacy Policy, we have not sold or shared any personal information about our customers. We do not use or disclose sensitive personal information, as defined in applicable laws, for any purposes other than those permitted by applicable law.

### *Submitting Requests*

If you are a resident of California, Colorado, Connecticut, Utah, or Virginia, you may submit your requests to opt out, correct, delete, and/or to know/obtain personal information we have collected about you by contacting us at [info@structuredfinance.org](mailto:info@structuredfinance.org).

We will respond to your request in compliance with the requirements of your state's applicable laws.

#### *Verification of Your Identity*

When you exercise these rights and submit a request to us, we will verify your identity by asking you to log in to your account if you have one with us. Or if you do not, we may ask for your email address. We may also use a third-party verification provider to verify your identity. We will endeavor to honor such requests unless such a request conflicts with certain lawful exemptions under your state's consumer privacy law.

#### *Appeal*

Residents of Colorado, Connecticut, and Virginia may appeal a decision we have made regarding their requests by emailing us at [info@structuredfinance.org](mailto:info@structuredfinance.org). We will respond to appeals from Virginia and Connecticut residents within 60 days. We will respond to appeals from Colorado residents within 45 days.

#### *Non-Discrimination*

If you make a request under your state privacy law, we will not discriminate against you in any way. For example, we will not deny you discounts or other benefits or impose penalties on you, or provide you with or suggest that you will receive a different level or quality of benefits or services.

#### *Authorized Agents*

You may permit an authorized agent to submit a request to know or to delete your personal information. If we receive a request on your behalf, we will ask that person to give us proof that you gave that person written permission to make a request for you. If that person does not provide us with written proof, we will deny their request so that we can protect your personal information.

#### *Automated Decision-Making*

We generally do not use automated decision-making technology, as that term is defined by state privacy laws. If we make use of automated decision-making technology, you will be informed through a separate privacy notice.

### **11. Visitors from Outside the United States—Cross-Border Transfer**

The Sites are hosted in the United States. If you are visiting the Sites from outside the United States, your information may be transferred to, stored and processed in the United States or other countries in accordance with this Privacy Policy. The data protection and other applicable laws of the United States or other countries may not be as comprehensive as those laws or regulations in your country or may otherwise differ from the data protection or consumer protection laws in your country. Your information may be available to government authorities under lawful orders and law applicable in such jurisdictions. By using the Sites and/or providing Personal Information to us, you consent to transfer of your information to our facilities as described in this Privacy Policy.

### **12. Right to Lodge Complaints**

We are transparent about the ways in which we collect and use Personal Information, and welcome your questions and concerns. If you have any concern or complaint about the way we handle your Personal Information, please contact us as described below. To the extent you believe we have not addressed your concerns or otherwise choose to do so, you have the right to lodge a complaint with a supervisory authority in the country where you reside and/or the United States. You may contact the US Federal Trade Commission regarding your concerns. For more information, please see <https://www.ftc.gov/faq/consumer-protection/submit-consumer-complaint-ftc>.

### **13. Badges**

Badges are non-transferable. Attendees are responsible for keeping their assigned Badges safe and secure at all times. If your Badge is lost or stolen, please contact us immediately for assistance. Badges are intended for use only at an Event. If you don't wish to use a Badge, you can simply carry and show a photo ID that matches the name identified on our Event attendee list.

### **14. Audio, Videos and Photos**

We reserve the right to use recorded audio, video or still photographs collected during the Events (the "Content") on an unrestricted basis for promotional and educational purposes, including without limitation, to be posted on the Site. By attending an Event, you hereby authorize us to use your image, likeness, personal characteristics and any other proprietary and publicity rights as contained in any Content as described in the sentence above without the requirement of further notice, royalty, payment or any other compensation to or consent from you. If you have a concern or wish to opt-out of this consent, please contact us as described in "How to Contact Us".

#### **15. Changes to This Privacy Policy**

We may change this Privacy Policy from time to time, including as required to keep current with rules and regulations, new technologies and security standards. When we do, we will let you know by appropriate means such as by posting the revised statement on this page with a new "Last Updated" date. Changes to this Privacy Policy will become effective when posted, unless indicated otherwise.

#### **16. How to Contact Us**

If you have questions or concerns about this Privacy Policy or how we collect and use the information of our customers or to request a copy of this Privacy Notice in another format, you can contact at [info@structuredfinance.org](mailto:info@structuredfinance.org). If we need, or are required, to contact you concerning any event that involves your information, we may do so by email, telephone, or mail.