

This Privacy Addendum for California Residents (“Addendum”) supplements Stephens Inc.’s Privacy Notice and applies to residents of the State of California only. The California Consumer Privacy Act of 2018 (“CCPA”) provides California residents (“you”) with certain rights with respect to their personal information. This Addendum outlines how Stephens Inc. (“Stephens,” “we,” or “us”) complies with those rights and how you can exercise your rights under the CCPA.

This Addendum does not apply to personal information outside the scope of the CCPA, which includes but is not limited to:

- Personal information publicly available from government records, deidentified or aggregate consumer information, or personal information covered by certain sector-specific privacy laws such as the Gramm-Leach-Bliley Act
- Personal information as set forth in the Fair Credit Reporting Act

What categories of personal information does Stephens collect?

The categories of personal information Stephens may collect about you (depending on what you share with us, the product(s) you have purchased, or the service(s) you receive from us) include the following:

Category	Examples (not exhaustive)
Identifying	Real name, postal address, email address, Social Security number
“Personal information” as defined by Cal. Civ. Code § 1798.80(e)	Name, signature, Social Security number, address, telephone number, passport number, driver’s license or state identification card number, employment, bank account number(s), any other financial information Note: Some “personal information” defined in Cal. Civ. Code § 1798.80(e) overlaps with information in other categories under the CCPA.
Protected Classification Characteristics	Age, citizenship, marital status
Commercial Information	Records of personal property, products or services purchased, obtained, or considered
Biometric Information	Fingerprint, voice recording
Online Information	Login credentials, Internet Protocol (“IP”) address, search and browsing history, geolocation data, device identifiers
Professional/Employment-related Information	Employment status, profession/occupation, employer, education

How Stephens Collects Your Personal Information

Stephens obtains the personal information described above from the following sources:

- Directly from you, such as when you complete a form or application, sign a contract, purchase products, obtain services from us, or contact us via our website
- Service providers, such as our website developers

How Stephens Uses Your Personal Information

Stephens uses the personal information we collect about you for one or more of the following business purposes:

- For the reason(s) you provided the information
- To create, maintain, and secure your account(s)
- To process your requests, transactions, and to prevent fraudulent requests and transactions
- To maintain and improve the safety, security, and quality of our website and other electronic systems
- To respond to requests from law enforcement, outside auditors and lawyers, and as required by applicable laws, court orders, or regulations.

How Stephens Shares Your Personal Information

Stephens may share the personal information it collects about you for a business purpose to one or more of the following third parties:

- Affiliates and subsidiaries of Stephens;
- Outside auditors, lawyers, or law enforcement to respond to court orders or legal investigations; or
- Credit bureaus.

Does Stephens Sell Your Personal Information?

No. Stephens does not sell your personal information.

Your Rights Under the CCPA

The CCPA provides you with specific rights regarding your personal information. These rights are:

- The right to request that Stephens disclose to you the categories and specific pieces of personal information we have collected data;
- The right to request that Stephens disclose to you:
 1. The categories of personal information we have collected about you;
 2. The sources of the personal information we have collected about you;
 3. Our business purposes for collecting your personal information;
 4. The categories of third parties with whom we share your personal information; and
 5. The specific pieces of personal information we have collected about you; and
- The right to request that Stephens delete any personal information about you that we have collected from you.

How to Request Disclosure or Deletion

To exercise any of the rights described in this Privacy Addendum, you must submit a verifiable consumer request to us by either:

- Calling us toll free at 1 (800) 292-7589
- Contacting us via our website at <https://www.stephens.com/locations/?referrer=ccpa>

Verifiable Consumer Requests

A verifiable consumer request is a request 1) made by you, by you on behalf of your minor child, or by a person registered with the Secretary of State and authorized by you to act on your behalf (your "authorized agent"), and 2) that we can reasonably verify is from you or your authorized agent.

If we cannot verify that you are making the request about yourself, your minor child, or that you are authorized to act on behalf of another consumer, we are not obligated to provide information to you. Stephens may require authentication of you that is reasonable in light of the nature of the personal information you are requesting. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Time and Format

Upon receipt of a verifiable consumer request, we will disclose and deliver the required information to you free of charge within 45 days. Please note that we may extend the time period by up to an additional 45 days if reasonably necessary, but we will provide notice to you of that extension within the first 45-day period. Stephens is not obligated to provide information to you in response to a verifiable consumer request more than twice in a twelve (12) month period.

The required information will be delivered to you by mail or electronically, at your option, in a reasonably useable format that allows you to transmit the information from one entity to another entity without hindrance. The information provided will only cover the twelve (12) months preceding the receipt of your request. If we are unable to comply with your request, we will explain that to you in our response.

Why might Stephens deny my request for deletion?

As stated above, you have the right to request the deletion of personal information about you that we have collected from you. There are reasons, however, that we may be unable to comply with that request. These reasons may include, but are not limited to, the following:

- Your personal information is necessary to complete the transaction for which your personal information was collected, to provide a good or service you requested, to complete an action reasonably anticipated within the context of our on-going business relationship with you, or to otherwise perform a contract between us;
- Your personal information is necessary to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity or to prosecute those responsible for such activity;
- Your personal information is necessary to debug our electronic systems to identify and repair errors that impair existing intended functionality;
- Your personal information is necessary to comply with the California Electronic Communications Privacy Act;
- Your personal information is necessary to enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us; or
- Your personal information is necessary to comply with a legal or regulatory obligation.

Non-Discrimination

Stephens will not discriminate against you for exercising any of your CCPA rights. We will not deny you goods or services; charge you different prices or rates for goods or services (including through granting discounts or other benefits or through imposing penalties); provide you with a different level or quality of goods or services; or suggest that you may receive a different price or rate for goods or services or a different level of quality of goods or services by exercising or not exercising your rights under the CCPA.