

**Last Updated: February 1, 2023**

## **MFS California Consumer Privacy Policy**

MFS takes consumer privacy very seriously. This California Privacy Policy (**the “Policy”**) supplements the information contained in our [Privacy Policy](#) and [Online Privacy Policy](#) and is provided in order to comply with the requirements of the California Consumer Privacy Act of 2018 (“**CCPA**”), the California Privacy Rights Act of 2023 (“**CPRA**”), and other California- based privacy laws (together the “CA privacy laws”). All terms used in this Policy have the same meaning as defined in the CA privacy laws.

### **1. SCOPE**

When we use the term "personal information", we are referring to information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer (i.e., a California resident) or household.

For purposes of this Policy, personal information does not include:

- Publicly available information from government records.
- Deidentified, aggregated or anonymized information that is maintained in a form that is not capable of being associated with or linked to you.
- Information excluded from the CCPA's scope, such as health or medication information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA); or information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), or the Gramm-Leach-Bliley Act (GLBA) (e.g., information concerning MFS Fund shareholders).

### **2. COLLECTION AND USE OF PERSONAL INFORMATION**

We collect personal information from and about you for a variety of purposes. For example, we use personal information:

- To provide and manage products and services to you or an entity with which you are affiliated.
- To communicate with you.
- For marketing purposes.
- To monitor questions and transactions to ensure service quality, compliance with procedures, and to combat fraud.
- To protect the security and integrity of our business, comply with legal and regulatory requirements and obligations, and as otherwise permitted or required by law.

In the last 12 months, we may have collected the following categories of personal information:

<b>Category of Personal Information Collected</b>	<b>Collected?</b>	<b>Source of collection</b>
<b>Identifiers</b> , such as your name, address, email address, SSN, driver's license number, passport number, or other similar identifiers.	Yes	<ul style="list-style-type: none"> <li>• Directly from you (for instance, some users provide us with their email address in order to receive marketing from us).</li> <li>• Via website activity (for instance, we may collect an IP address via our cookies. Please see our <a href="#">Cookies Policy</a> for more details).</li> <li>• From business partners or other third parties (for instance, in order to obtain contact details).</li> <li>• From institutional clients (for instance, to fulfill certain due diligence requirements).</li> </ul>
<b>California Customer Records</b> (Cal. Civ. Code § 1798.80(e)), such as birthdate, contact information and payment information.	Yes	<ul style="list-style-type: none"> <li>• Directly from consumers (for instance, some users provide us with their email address in order to receive marketing from us).</li> <li>• Via website activity (for instance, we may collect an IP address via our cookies. Please see our <a href="#">Cookies Policy</a> for more details).</li> <li>• From business partners or other third parties (for instance, in order to obtain contact details).</li> <li>• From client representative (for instance, to fulfill certain due diligence requirements).</li> </ul>
<b>Protected Classification Characteristics</b> , such as age, race, religion or creed, marital status, medical condition, gender, sexual orientation, veteran or military status, genetic information, etc.	Yes	<ul style="list-style-type: none"> <li>• From business partners -although not collected systematically, there are instances where we may obtain this information (e.g., for instance, business contacts may share details such as an upcoming marriage or birth of a child with our sales force).</li> </ul>
<b>Commercial information</b> , such as services purchased, obtained.	Yes	<ul style="list-style-type: none"> <li>• From consumers or third parties (e.g., information about a financial intermediary's or client representative's business transactions with MFS and other managers)</li> </ul>
<b>Biometric information</b> , such as face, eye or other biometric scans.	No	
<b>Internet or similar network activity</b> , such as device information, logs and analytics data.	Yes	<ul style="list-style-type: none"> <li>• Via website activity (for instance, our cookies may give us information regarding how consumers interact with our website. Please see our <a href="#">Cookies Policy</a> for more details).</li> </ul>
<b>Geolocation data</b> , such as approximate location information from your device or generated based on IP address.	Yes	<ul style="list-style-type: none"> <li>• Via website activity (for instance, our cookies may give us information regarding how consumers interact with our website. Please see our <a href="#">Cookies Policy</a> for more details).</li> </ul>

<b>Sensory data</b> , such as recordings of phone calls with us, where permitted by law.	Yes	<ul style="list-style-type: none"> <li>• Directly from you</li> </ul>
<b>Professional or employment- related information</b> , such as previous contact details or your employment history (applicants only)	Yes	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• From business partners or other third parties (for instance, as it may relate to past contact details).</li> <li>• For applicants, from third parties you direct to share information with us.</li> </ul>
<b>Non-Public Education Information</b> (20 U.S.C. § 1232g, 34 C.F.R. Part 99), such as educational history, degree (for applicants)	Yes	<ul style="list-style-type: none"> <li>• Directly from you</li> <li>• Third parties you direct to share information with us.</li> </ul>
<b>Inferences</b> , such as predictions about your interests and preferences.	Yes	<ul style="list-style-type: none"> <li>• Via website activity (for example, in certain instances a user’s behavior on our website may be associated with an email address if the user is has arrived at our website via our email marketing. The association of website behavior with a user profile is for MFS internal use only and never shared with third parties).</li> </ul>

### Sensitive Personal Information

Some of the personal information described in the “Category of Personal Information” table above also constitutes “Sensitive Personal Information” under the CA privacy laws. We use and disclose Sensitive Personal Information for business and compliance functions and for legally authorized purposes. We currently do not collect or use Sensitive Personal Information for the purpose of inferring characteristics about consumers.

Categories of Sensitive Personal Information which we collect and use:

- Government-issued Identifiers: Social Security Number, driver’s license, state id card or passport number
- Account log-in credentials: (usernames with password, access code or other credential that permits access to an account) allowing access to your account for our digital offerings. This information would be sourced directly from you and does not relate to financial accounts.
- Non-publicly available information about racial or ethnic origin, religious or philosophical beliefs, or union membership
- Non-publicly available health information and sexual orientation information

### 3. Data Retention Period

MFS will retain records that (hardcopy and electronic) that are legally required to be maintained. Generally, MFS will maintain these records, or cause them to be maintained, for at least the minimum period required. Records that are required to be maintained by more than one applicable law and/or under differing storage requirements, will be maintained for the longest retention period and in accordance with the most restrictive storage standard.

#### **4. DISCLOSURE OF PERSONAL INFORMATION**

##### **Sharing of Personal Information**

We may share personal information with third parties for a business purpose including delivering online advertisements to you on your devices and tailoring those ads to your interests. Whenever we disclose personal information to a third party, we enter into a contract that:

- prevents or limits the ability of the third party to further share the information with other entities and requires the third party to keep the information confidential,
- contains all required obligations as well as appropriate data protection practices as prescribed by the CA privacy laws.

In the past 12 months, MFS may have shared the following categories of personal information to third parties for a business purpose:

- Identifiers
- Personal Information categories listed in the California Customer Records statute.

##### **Sale of Personal Information**

MFS does not sell your personal information. As previously mentioned, in some instances MFS may share personal information with third parties. However, these instances are either not a “sale” of information under the CA privacy laws or qualify for an exemption to the definition of “sell” (such as providing information to a third party for a specific purpose).

#### **5. YOUR RIGHTS UNDER THE CA Privacy Laws**

As a California resident, you may be able to exercise the following rights in relation to the Personal Information about you that we have collected (subject to certain limitations):

<b>The Right to Know</b>	You have the right to request any or all of the following information relating to your personal information we have collected and disclosed in the last 12 months, upon verification of your identity: <ul style="list-style-type: none"><li>• The specific pieces of personal information we have collected about you;</li><li>• The categories of personal information we have collected about you;</li><li>• The categories of sources of the personal information;</li><li>• The categories of personal information that we have disclosed to third parties for a business purpose, and the categories of recipients to whom this information was disclosed;</li><li>• The categories of personal information we have sold and the categories of third parties to whom the information was sold; and</li><li>• The business or commercial purposes for collecting or selling the personal information.</li></ul>
<b>The Right to Request Deletion</b>	You have the right to request the deletion of personal information we have collected from you, subject to certain exceptions.
<b>The Right to Correct Inaccurate Personal Information</b>	You have the right to request the correction of inaccurate personal information.

<b>The Right to Limit Use and Disclosure of Sensitive Personal Information</b>	We currently limit our uses and disclosure of Sensitive Personal Information only to those purposes permissible under CA privacy laws as described above in the "Collection and Use of Personal Information" section of this Policy. We currently do not collect or use Sensitive Personal Information for the purpose of inferring characteristics about consumers and therefore do not offer a right to limit our use and disclosure of your Sensitive Personal Information. In the event our practices change, we will update this Policy and provide you with an option to limit our use and disclosure of your Sensitive Personal Information.
<b>The Right to Opt Out of Personal Information Sale/Sharing</b>	You have the right to direct us not to sell or share personal information we have collected about you to third parties now or in the future.
<b>The Right to Non-Discrimination</b>	You have the right not to receive discriminatory treatment for exercising these rights.

## **6. TO EXERCISE YOUR RIGHTS UNDER THE CA Privacy Laws**

MFS has set up both a toll-free telephone number and a web form through which you can submit your request. The web form is available [here](#) and the toll-free telephone number is 1-800-637-7747.

When we receive a request, we will attempt to verify the requestor's identity both as a California resident and by associating the identity with personal information previously collected. As such, the request must provide us with enough information that we can reasonably identify and verify that you are the person about whom we collected personal information. If we are unable to comply with all or a portion of your request, we will explain the reasons for declining to comply with the request.

You may make requests on behalf of your minor children. You may also register another person with the California Secretary of State in order to authorize that person to act on your behalf.

We will attempt to respond to all verifiable consumer requests within 45 days. In the event we need more time to respond to a request, the CA Privacy Laws allows for an additional 45 days extension. We will notify you within the first 45-day period if we will need to extend the time to respond.

## **7. Additional Information**

### **Updates to this Document**

We will update this document from time to time. When we make changes, we will change the "Last Updated" data at the beginning of the document.

### **Contact Us**

If you have any questions or requests in connection with this document or other privacy-related matters, please send an e-mail to [MFSPrivacyOffice@mfs.com](mailto:MFSPrivacyOffice@mfs.com), contact us via telephone number 1-800-637-7747 or complete the [web form](#).