

Global Corporate Privacy Policy

Last Update Effective: December 30, 2022

What is this Policy about?

S&P Global Inc. and its affiliates (collectively or individually, as applicable, referred to as "S&P Global", "we", "our", "us") respect your right to privacy. This global Corporate Privacy Policy ("Policy") explains who we are, how we collect, share, transfer and use personal information about you, and how you can exercise your privacy rights. This Policy applies to interactions we have with you via our websites, applications and other products and services including events, where you otherwise contact us and where we otherwise display or link to this Policy ("Services") or in the course of our receipt of products or services from you or your employer.

Please note that some privacy rights and obligations may differ in certain locations based on applicable local data protection laws. We have included supplemental information for certain jurisdictions in this Policy.

Third parties that link from or to our Services, or from whom we collect personal information may have their own privacy policies and practices. This Policy does not apply to sites or applications offered by other companies or individuals, including third party products and services, that may be displayed as content in a search on our website. Please review any third-party policies to learn more about their practices.

To the extent a notice provided at the time of collection from a website or specific product conflicts with this Policy, the terms of that specific notice or supplemental privacy statement will apply.

If you enter into a separate agreement with us which requires, or contemplates, collecting, sharing, transferring, using or otherwise processing information about you in a manner that is different than that which is described in this Policy, the terms of that agreement will apply.

For more about the S&P Global's commitment to privacy, please see the privacy mission statement and resources at: <https://www.spglobal.com/en/privacy/our-privacy-commitment>.

What does S&P Global do?

S&P Global is a leading provider of transparent and independent ratings, benchmarks, analytics and data to the capital and commodity markets, businesses and governments worldwide. For more about the S&P Global current group companies and other related companies, please see our latest filings [here](#).

What personal information does S&P Global collect and why?

The information that we collect from or about you – some of which is personal information under applicable data protection laws - falls into the following broad categories:

1. Information that you provide to us

As part of our Services, you may provide certain information to us, such as your contact details, user credentials, and employment information.

A few examples include, when you fill out an on-line form to register to use our Services, such as to attend an event, to request a free trial or courtesy newsletter, or to receive research, white papers, product information or reports through our website. You may also provide us with your business card

information or other contact information as you conduct business with us, or you request information from us. Information we ask you for and why we ask you for it includes:

Types of personal information

Why we collect it

Billing information (including your payment card information)

To maintain your account with us and to provide you with requested products and services.

For order processing and to provide transaction documents.

Contact details such as name, telephone numbers (which may include cell/mobile numbers), email address and postal address and details of any correspondence between us.

To respond to your communications and inquiries, such as when you want to learn more about our conferences and webinars.

If requested, to provide product serviceupdates, information and alerts.

To contact you for information verification purposes.

To gather information needed to provide and deliver maintenance, support and training for Services requested by you or your employer.

To obtain your feedback regarding our Services, including an event you attended, such as when we or our agents send you a customer satisfaction survey.

To receive services from you or the corporate entity you represent.

User credentials including name, email address, signature and any personal login information you provide to us when you create a profile, such as details of your education and your gender.

To set up and maintain your user account.

To monitor and enforce compliance with our contract terms.

Some product platforms also allow users to upload data themselves including age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, sex (including gender, gender identity), pregnancy or childbirthand related medical conditions, sexual orientation, veteran or military status, for their

To enable clients to use our product platforms for their own purposes.

own purpose, as detailed in the product terms of use.

Employer and employment information such as job title, company affiliation, function, seniority, department and location of your office.

To manage your individual user account when it is covered by an account of a S&P Global corporate customer, such as the corporate account of your employer.

Your preferences and interests, such as emails and newsletters you would like to receive, or have opted out from receiving, or the markets, industries and conferences that interest you.

To enable us to send you tailored information on our Services across our divisions that may interest you, to allow you to participate voluntarily in mailings and other events and to allow us to promote our events and Services.

We may record (voice or audio) and/or collect images of you, provided that you do not object (and that you have opted in, where required by law), for example, at an in-person or virtual event.

To provide the event content to individuals who were not able to attend the live event, to promote our events in live recordings, or to otherwise provide event content. In some instances, we may also use technology to create automated transcriptions.

To enable us to send you tailored information on our Services across our divisions that may interest you, to allow you to participate

Social security/Official identification number, state identification card number, credit card numbers, and personal financial data (such as specific salary, mortgage details, net worth or individual portfolio information). We refer to this type of personal information as "Customer Financial Data."

Issues, questions and problems you have when using our Services, your user preferences and how you use or want to use our Services and information which you seek to analyze or manipulate within our Services and which you communicate to our support, maintenance and training staff. We may also record telephone service calls with you, subject to an announcement at the beginning of the call. In some instances, we may also use technology to create automated transcriptions.

voluntarily in mailings and other events and to allow us to promote our events and Services.

In some cases, our corporate customer, such as a structured finance issuer, or you, may provide Customer Financial Data to us for the purpose of informing our statistical analysis or for our use in providing our Services. Customer Financial Data will not be used for purposes other than these and will not be rented or otherwise made available to third parties for public distribution.

For conducting due diligence activities for financial institutions and other regulated companies as part of our know-your-client products.

To maintain your account with us, provide technical support to that account, remedy issues or problems with that account, train you in the use of our Services and keep an auditable record of all such communications and actions which is accessible to our support, maintenance and training staff globally.

2. Information that we collect automatically

We may collect information automatically from your device, including information regarding how you use our Services. Where required by applicable law, we will obtain your consent before we place any cookies on your device that are not strictly necessary for the functioning of our websites.

Information we may collect automatically includes your log-in events (when, how and for how long you log into and use certain Services), IP or MAC address, device make, model and operating system, mobile network information, internet service provider, unique device identification number, advertising ID, browser type and language, geographic location (e.g., country or city level location or time zone) and other technical information. We may collect "click stream" data, which is information about how your device interacts with our Services, such as the pages, screens, functions, applications and products accessed, and links clicked.

This information helps us understand users of our Services, such as visitors to our websites, the pages they visited before and after and what content and functions interest them. We use this automatically collected information:

- for our analytics purposes, including to enhance our understanding of usage of our Services;
- to improve the quality and relevance to users of our Services, including (with consent as applicable) by showing or offering users relevant Services or content based on their preferences and usage habits;
- to develop or accelerate research, analysis, news and related editorial content and information collection as part of our Services, or to enable others to develop/accelerate such content where permitted;
- to offer you support with and training on our Services and to help resolve any errors or technical issues;
- to develop and update our Services;
- for customer services, such as evaluating our customers' training needs for our products;
- to satisfy requests from S&P Global corporate customers regarding the entitlement to and use of our Services by individual users under their corporate accounts (this information may be offered to clients in an aggregated form and clients may be required by law to request certain such information);
- to deliver tailored information on our Services that may be of interest or value to you and to send you marketing and promotional emails with your consent if required by applicable law;
- occasionally, to identify unauthorized use or unauthorized distribution of our Services related or unrelated to a security issue;
- where relevant, to review or update pricing agreed with our customers; and
- for billing purposes, so that we or others (such as our content providers) can bill for the services provided.

Some of this information is collected using cookies, weblogs, web beacons and similar tracking technology - see "How does S&P Global use cookies and similar tracking technology."

3. Information that we obtain from other sources

We may receive personal information about you from other sources (including your employer or business partner if you use Services covered by a subscription). Where you register as a user, we will endeavor to check that these third parties have your consent or are otherwise legally permitted or required to disclose your personal information to us.

The information we collect from your employer (if you use our Services under your employer's corporate subscription) consists of your contact details and employment-related information.

We collect personal information from other third parties, such as marketing vendors, survey services, social media, conferences and other events that we or others organize, and other sources to the extent permitted by applicable law. We use this information to market our Services to you, to maintain and correct our records, to add data fields, and to enhance the marketing, delivery and support of our Services to you.

We collect personal information as part of our content collection process for some of our products. We obtain this from a variety of sources, including third-party content providers, public filings, direct communication with your employer or appointor and websites, to display within some of our products. Find out more at "How does S&P Global use personal information in products?".

The automotive business collects and compiles motor vehicle registration and title information to provide products and services to authorized entities pursuant to 18 U.S.C A. §2721 and similar state laws governing the use of such information. Consumer information from motor vehicle records is used in compliance with the governing laws and regulations and thus not used by S&P Global or provided to other entities by us for direct marketing purposes. To access or correct your motor vehicle registration and/or title information, you must contact your state's department of motor vehicles or other state agency that processes motor vehicle titles and registration. The [American Association of Motor Vehicle Administrators](#) maintains links to state motor vehicle agency websites, organized by AAMVA regions.

We also may use your personal information for other purposes that we explain to you at the time we collect your personal information or, if permitted by applicable data protection laws, that are compatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes).

S&P Global policies, procedures and standards require that the information in its products is updated for accuracy on a regular basis and removed from its systems when such data becomes obsolete or inaccurate. S&P Global has established information governance standards for collection, use and retention of personal information.

To the extent we maintain and use personal information in a deidentified or anonymized form, we will not attempt to reidentify the information, except for the purpose of determining whether our deidentification/anonymization processes satisfy our legal obligations.

4. Other personal information collected through our mobile apps

When you download, access or otherwise use one of our mobile apps, the information that we collect depends on your device, in-app and operating system permissions. Our apps may require access to applications and/or data on your mobile device to function. When you agree, some of our apps collect the precise geo-location of your mobile device and some of our apps also collect information that may be personal information about you or others, from or about:

Your calendar

Your contacts and call information

The accounts and other apps on your mobile device
Photos (including date, time, location and contents)
Media files, metadata and other stored information

We also may automatically collect app logs and usage statistics. For example, we may record when you open an app so that we can monitor which app is used, when and how, and if the app stops working, we log the "crash data," such as whether you have mobile reception, to help us identify and fix the cause.

To learn more about the specific information collected by any of our mobile apps, please check your device settings or review the platform from which you downloaded it. To stop collection of all information through one of our apps, please uninstall the app.

- When does S&P Global disclose my personal information?

The categories of personal information listed in the "What personal information does S&P Global collect and why?" section above may be disclosed to the following categories of recipients.

Our group companies and our joint venture companies where applicable, service providers including, without limitation, professional advisers or consultants such as lawyers, bankers, auditors, accountants and insurers providing consultancy, legal, banking, audit, accounting or insurance services, financial institutions providing finance to us, external auditors, product content providers, business partners and any organization that arranges your access to our products or services (if that is not you).

We share personal information with those authorized parties referred to above for purposes consistent with those described in this Policy or as notified to you when your personal information is collected. For example, we may share your personal information with the organization that arranges your access to our products or services to fulfill its contractual obligations and to provide our products and services and support and training for them. We may share your personal information with our service providers and business partners for the purpose of operating our business, honoring a request that you have made through the products or services, delivering, improving and customizing our products or Services, sending marketing and communications related to our business, payment processing, and for other legitimate purposes permitted by applicable law or otherwise with your consent. We may share the contact information you provide when registering for an event and share event attendee lists between our S&P Global divisions and with our webinar and conference partners, to ensure that your contact information is up to date and to administer, secure, and seek feedback on and promote our events.

For a list of our current group companies and related companies, please see our latest filings [here](#). A list of the categories of our service providers, content providers and business partners are available [here](#). For information about the disclosure of the California enumerated categories please see the California jurisdictional section below.

In addition to the purposes described in this Policy, personal information handled by our service providers may be subject to their terms of use and privacy policies, which if applicable, will be provided to you. Please review any applicable service provider terms of use and privacy policies to better understand how they manage your personal information.

Your employer

We may provide personal information to your employer for purposes such as to fulfill and enforce our contract with them, to inform them of potential group training needs, to inform them of Service use by certain categories of users and for pricing purposes.

Competent law enforcement bodies, regulatory, government agency, court or other third parties

We may provide personal information to any competent law enforcement body, regulatory, government agency, court or other third party in accordance with applicable law and regulation when we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to protect against fraud or for risk management purposes, (iii) to cooperate with relevant agencies for the investigation and prevention of crimes such as insider trading, (iv) to exercise, establish or defend our legal rights, (v) to protect your vital interests or those of any other person, or (vi) to protect the interests, rights, safety or property of us or others.

S&P Global is regulated by various federal and state agencies, authorities and similar regulatory bodies internationally and, in the normal course of business, both in the United States of America and abroad, is the subject of government and regulatory proceedings, investigations and inquiries. We may therefore disclose your information to comply with a court order, government request or other legal or regulatory process sometimes without prior notice to you.

Our SEC filings set this out in more detail and are available [here](#).

Potential Buyers

We may provide personal information to a potential buyer or a target (and that third party's or our agents and advisers) in connection with any proposed sale, purchase, merger, transfer, acquisition or liquidation or similar event, of all or any part of our businesses. If such a change happens to our business, the buyer or target will use your personal information in the same way as set out in this Policy or will inform you about how it will use your personal information as required by applicable law.

Other third parties

Personal information that you disclose on message boards, chat areas or social media pages or in direct messages to other users of these platforms may be collected and used by third parties to contact you, to send you unsolicited messages or for other purposes without our knowledge or control. Social media forums and chat rooms not operated by us may have additional rules and conditions. We are not responsible for the personal information or any other information you choose to submit on these forums that are not controlled by us.

The Services may offer you the ability to share personal information through a social networking site (e.g., Facebook, Twitter) using integrated tools (e.g., Facebook "Like" button, or Twitter "Tweet" button). The use of such integrated tools enables you to share personal information about yourself with other individuals or the public, depending on the settings that you have established with such social networking site. For more information about the purpose and scope of data collection and use in connection with such social networking sites or a site's integrated tools, please visit the privacy policies of the entities that provide these social networking sites.

We encourage you to use caution when publicly disclosing your personal information.

We may ask for your consent to share your information with other unaffiliated third parties who are not described elsewhere in this Policy.

For more information about how and why we disclose the personal information that features in our products, please see "How does S&P Global use personal information in products?" below.

What is our legal basis for processing personal information?

Our legal basis for collecting and processing personal information depends on the personal information concerned, the context in which we collect it and the applicable laws and regulations.

Generally, we collect personal information from you where: we have your consent to do so; we need

the personal information to perform a contract with you (for example, your subscription to one of our products) where permitted under applicable data protection laws; or, in some jurisdictions such as the European Economic Area ("EEA"), the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms or the processing is otherwise consistent with applicable law. In some cases, we are required by law to collect personal information from you.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will inform you whether the provision of your personal information is mandatory and the possible consequences if you do not provide your personal information.

Where we send you marketing or promotional e-mails regarding our Services from our different divisions and affiliates, we do so based on your consent, if required by applicable law.

Generally, if we collect and use your personal information in reliance on our legitimate interests (or those of a third party), this interest is to provide our Services to you and for our legitimate commercial interest (e.g., when responding to your queries, improving our Services, processing payments, advising you of product features or new releases, providing training, informing you of product maintenance, or undertaking marketing activities). For the legal basis on which we rely in relation to personal information in our products, please see "How does S&P Global use personal information in products?" below.

How does S&P Global use cookies and similar tracking technology?

Generally

We use cookies and similar tracking technology (collectively, "Cookies") in certain Services (in particular our websites and some mobile applications) to collect and use personal information about you, in order to better understand and improve the usability, performance, and effectiveness of our Services, to help us tailor content or offers for you, and to serve our targeted interest-based advertising. These technologies may also allow certain third parties to collect information about you over time and across different websites, such as information about you clicking on advertisements or installing our Services. Where permitted by applicable law, we will deploy first party performance or analytics Cookies automatically when you visit our websites. Where required by applicable law, we will obtain your consent before we place any Cookies on your device that are not strictly necessary for the functioning of our websites. To learn more, including about how to consent to or opt-out and withdraw your consent to Cookies, please see our [Cookie Notice](#).

We may use Google Analytics to better understand how visitors use our Services. Google Analytics provides us with information about users of our Services. Google Analytics uses Cookies that Google or its affiliate DoubleClick recognizes when you visit other websites and applications. For more information about how Google collects, uses, and shares your information, including information collected through our Services, please visit the Google Privacy Policy - Partners website at <https://policies.google.com/technologies/partner-sites> or see Google's own Privacy Policy at <https://policies.google.com/privacy>.

Google Analytics uses Cookies to help us analyze how users use our Services. Personal information generated by these Cookies about your use of our Services (including your IP address) will be transmitted to and stored by Google on servers in the United States of America. On our behalf, Google will use this information to evaluate your use of our Services and will compile reports on your activity for us.

If you want to opt out of Google Analytics, you can download and install the opt-out browser add-on developed by Google for your web browser. For more information about Google Analytics' currently

available opt-outs, please see <https://tools.google.com/dlpage/gaoptout>.

For more information about our privacy practices relating to our advertising services, please see the **Digital and advertising-related services** section of this Policy.

How does S&P Global keep my personal information secure?

We protect personal information that we process with appropriate technical and organizational measures designed to provide a level of security appropriate to the risk of processing your personal information. We will notify you about any security incident involving your personal information through email, correspondence, telephone, push notification or other means, as required by applicable law. If you think your data is the subject of a security incident and we have not notified you, or if you are concerned about the security of your data, please contact our dedicated security team at security@spglobal.com.

How does S&P Global treat international data transfers?

Your personal information may be transferred to, and processed outside, the jurisdiction in which you reside. These other jurisdictions may have data protection laws that are different from the laws of the jurisdiction of your residence (and, in some cases, not as protective).

S&P Global is a multi-national group with headquarters in New York, United States of America. Our servers may be located outside of the jurisdiction where we collected the data. We may store and replicate your personal information on servers in other jurisdictions in order to provide speed of access, robustness and protection against server failure.

When we collect your personal information, we may transfer it to or from any of the countries in which we do business. Our group companies, related companies, any organization that arranges your access to our products or services, service providers, product content providers and business partners, with whom we may share personal information, are located in and transfer personal information to various jurisdictions around the world. The principal jurisdictions where personal information is hosted by or on behalf of S&P Global are the United States of America, Canada, the United Kingdom, Germany, the Republic of Ireland, Italy, France, Switzerland, the Netherlands, India and Singapore. In some cases, your personal information may also be accessed from outside of the jurisdiction where we collected the data, such as the Philippines, India and Pakistan, where our back-office support personnel are located for certain Divisions.

Where your personal information is transferred by us or on our behalf, we implement appropriate safeguards to protect your personal information in accordance with this Policy. These safeguards include implementing applicable standard contractual clauses for transfers of personal information between our group companies, which require group companies to protect personal information they transfer from the jurisdiction in which it was collected in accordance with applicable data protection law.

Where required by applicable law, international transfers take place only when there is an adequate level of protection to the fundamental data protection rights of individuals. In some circumstances, we may choose to rely upon an adequacy decision to lawfully transfer personal information.

Standard contractual clauses are one of several mechanisms that allow for personal information to be transferred across jurisdictional borders and we may rely on these for transfers to and from our affiliates, vendors and business partners where applicable. Additional safeguards may also be implemented where personal information is transferred. Please contact us to request a copy of our appropriate safeguards.

For how long does S&P Global retain personal information?

Our applicable information governance policies, procedures and standards require that personal

information be retained for as long as we have an ongoing legitimate business need to do so (for example, to provide you with a Service you have requested, or to comply with applicable legal, tax or accounting requirements).

Once we no longer have a legitimate business need to process your personal information, our applicable information governance policies, procedures and standards require that we either delete or anonymize your personal information, or if deletion or anonymization is not possible, then pseudonymize and/or securely store your personal information and isolate it from any further processing until deletion is possible.

If you have any questions or require any further information about the period of time for which we will process your personal information, please contact us using the contact details set out below.

What are your data protection rights?

Depending on which laws apply to your personal information, you may have the right to make the following requests regarding your personal information:

- **Access to Your Personal Information.** You may request access to your personal information or confirmation that we have information about you. In certain limited circumstances, you may also request to receive access to your data in a portable, machine-readable format.
- **Deletion Of Your Personal Information.** You may request that we delete your personal information. If required by law, we will grant a request to delete information, but you should note that in many situations we must keep your personal information to comply with our legal obligations, resolve disputes, enforce our agreements, or for another business purposes.
- **Corrections To Your Personal Information.** We rely on you to update and correct your personal information. Where your personal information is required to access or use Services, you may have the opportunity to correct, update, or modify this information by logging into your account and updating your information online. You may ask us to correct information that is inaccurate or incomplete. Note that we may keep historical information in our backup files as permitted by law.
- **Objection to Certain Processing.** You may object to our use or disclosure of your personal information by contacting us at the address described below.
- **Opt-out of Targeted Advertising.** You may opt-out of online tracking based targeted advertising or cross-context behavioral advertising (e.g., cookies) by clicking the cookie settings link on the footer of our websites. Please note that if you change browsers or computers, or if you clear your browser's cache, you may need to click the link again to apply your preference.
- **Opt-out of Sale.** You may opt-out of the sale of your personal information by clicking [here](#) or the "Do Not Sell My Personal Information" link on our homepage.
- **Restrict Processing.** You may request that we restrict our processing of your personal information under certain circumstances, such as when you contest the accuracy of our records about you, or you make an objection.
- **Promotional Emails.** You may choose to provide us with your email address for the purpose of allowing us to send free newsletters, surveys, offers, and other promotional materials to you, as well as targeted offers from third parties. You can stop receiving promotional emails by following the unsubscribe or "opt-out" instructions in emails that you receive, by visiting our preference center [here](#) or by using the contact details listed on [this page](#). If you decide not to receive promotional emails, we may still send you service-related communications.
- **Revocation Of Consent.** Where we process your personal information based upon consent, you may revoke consent. Withdrawing your consent will not affect the lawfulness of any processing we conducted before withdrawal, nor will it affect processing of your personal

information conducted in reliance on lawful processing grounds other than consent. Please note, if you revoke your consent for the processing of personal information then we may no longer be able to provide you services.

Please note, not all of the rights described above are absolute, and they do not apply in all circumstances. In some cases, we may limit or deny your request because the law permits or requires us to do so, because a right is not granted by the laws that apply to a specific person, or if we are unable to adequately verify your identity. Individuals in certain jurisdictions may have other rights. For more information, see the applicable jurisdiction-specific addendum which forms part of this Policy. We will not discriminate against individuals who exercise their privacy rights under applicable law.

You may use this [Personal Information Request Form](#) or call us on 1-855-529-1761 to exercise any of your rights. If you disagree with how we handled a request, you may appeal our decision by contacting us with the subject line "Appeal," at privacy@spglobal.com.

We respond to requests we receive from individuals wishing to exercise their data protection rights or express any concern in accordance with applicable data protection laws, which typically require a response within 30 days. Please be aware that in order to accommodate some requests, we must verify your identity before we can respond, and this may require you to provide photographic or other forms of identification to us.

In some circumstances, you may designate an authorized agent to submit requests to exercise certain privacy rights on your behalf. If you are an authorized agent submitting a request on behalf of an individual, you must provide all requested information establishing your authorization as an agent to act on another person's behalf.

If you are not satisfied with our response, and are in the European Union or United Kingdom, you may have a right to lodge a complaint with your local supervisory authority. Contact details for data protection authorities in the EEA, Canada, Switzerland and the UK are available [here](#).

Please note that in certain jurisdictions we may be entitled to charge a fee in connection with the exercise of these rights, which will be communicated to you if applicable.

What happens if this Corporate Privacy Policy is updated?

We review and update this Policy from time to time. When we do, we will bring those updates to your attention, for example, by noting the date of the version on the Policy, posting the updated version here or sending you a notification. To the extent that this Policy changes in a material way, the Policy that was in place at the time that you submitted personal information to us will generally govern that information unless we receive your consent to the new privacy policy.

How can you contact us?

If you have any questions or concerns about our use of your personal information, or if you need to access this Privacy Policy in an alternative format due to having a disability, please contact our

Privacy Compliance team at privacy@spglobal.com, 1-855-529-1761, or 55 Water Street, New York, NY 10041.

You may also use this [personal data request form](#) to contact us or exercise any of your rights.

In some of our locations, we also have local contact details that you may prefer to use as set out in the following jurisdictional supplements:

- Russian Federation
- People’s Republic of China
- Japan
- State of California, United States of America
- Brazil
- Colombia

For the Philippines, you may also use email DPOPhilippines@spglobal.com.

European Union Contact Details for non-European Union S&P Global Entities and Affiliates

Certain S&P Global entities located outside the European Union (“EU”) have appointed representatives within the EU. If you are an EU resident, you may choose to contact the relevant EU representative for any data protection-related enquiries in addition to, or instead of, the contact details above. Please use the applicable contact details below.

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|---|---|
| S&P Global Ratings Fourth Floor, Waterways House Grand Canal Quay Dublin 2, Republic of Ireland RatingsGDPR@spglobal.com | S&P Global Market Intelligence Fourth Floor, Waterways House Grand Canal Quay Dublin 2, Republic of Ireland MIPrivacyOfficer@spglobal.com |
| S&P Dow Jones Indices Fourth Floor, Waterways House Grand Canal Quay Dublin 2, Republic of Ireland spdjiGDPR@spglobal.com | S&P Global Commodity Insights Fourth Floor, Waterways House Grand Canal Quay Dublin 2, Republic of Ireland PlattsGDPR@spglobal.com |

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|---|--|
| S&P Global Engineering Solutions Fourth Floor, Waterways House Grand Canal Quay Dublin 2, Republic of Ireland PlattsGDPR@spglobal.com | S&P Global Mobility Fourth Floor, Waterways House Grand Canal Quay Dublin 2, Republic of Ireland PlattsGDPR@spglobal.com |
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UK Contact Details for non-UK S&P Global REPLACE 20CS WITH 25RM NOW

Certain S&P Global Inc. and its applicable affiliates located outside the UK have appointed representatives within the UK. If you are a UK resident, you may choose to contact the relevant UK representative for any data protection-related enquiries in addition to, or instead of, the contact details above. Please use the contact details below by division.

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| S&P Global Ratings 20 Canada Square Canary Wharf London E14 5LH RatingsGDPR@spglobal.com | S&P Global Market Intelligence 20 Canada Square Canary Wharf London E14 5LH MIPrivacyOfficer@spglobal.com |
| S&P Dow Jones Indices 20 Canada Square Canary Wharf London E14 5LH spdjiGDPR@spglobal.com | S&P Global Commodity Insights 20 Canada Square Canary Wharf London E14 5LH PlattsGDPR@spglobal.com |
| S&P Global Engineering Solutions 20 Canada Square Canary Wharf London E14 5LH PlattsGDPR@spglobal.com | S&P Global Mobility 20 Canada Square Canary Wharf London E14 5LH PlattsGDPR@spglobal.com |

Russian Federation

As of 30 September 2022, S&P Global has suspended operations in the Russian Federation. Some processing of personal data may occur in relation to any regulatory or legal obligations in the Russian Federation, such as for the purpose of fulfilling tax, employment and any other legal obligations.

Any ongoing processing of personal information of Russian citizens is executed by the Schneider Group, on behalf of Standard & Poor's International Services LLC and Moscow Branch of S&P Global Ratings Europe Limited. For any questions about this processing, please see the Schneider Group's [Privacy Policy](#) or contact info@schneider-group.com.

China

This China Addendum ("China Addendum") applies to the processing of your personal information only if you are located in the People's Republic of China ("China") and supplements this Policy. In case of any inconsistencies between this China Addendum and the rest of this Policy, this China Addendum prevails.

- Sensitive Personal Information.** Your personal information whose leakage or unlawful use may easily infringe the dignity of a natural person, or cause harm to the personal safety or property security, including biometric characteristics, religious beliefs, specially designated status, medical health, financial accounts, personal whereabouts and personal information of minors under the age of 14 may be considered as sensitive personal information in accordance with applicable Chinese law and regulations ("Sensitive Personal Information"). To the extent we collect this Sensitive Personal Information, we will only process it to the extent necessary for fulfilling the purposes as stated in this Policy and will take measures for its security. Where required by applicable Chinese law and regulations, we will obtain your separate consent before we process your sensitive personal information.
- Sale of business.** We may provide personal information to a potential buyer or target (and that third party's or our agents and advisers) in connection with any proposed purchase, merger, transfer, acquisition or liquidation or similar event of all or any part of our business. If such a change happens to our business, the buyer or target will use your personal information as in the same way as set out in this Policy, including this China Addendum, or will inform you about how it will use your personal information as required by applicable law, or (where applicable) require such third party to obtain your consent again.
- Notifications.** We cannot absolutely guarantee the security of any information or data you provide online. In the event of a security incident, we will take mitigation measures in accordance with our incident response plan and report to competent regulators in China as required by applicable law. In the event of a security incident affecting your personal information, we will notify you as required by applicable law through email, correspondence, telephone, push notification or other means. If you think your data is the subject of a security incident and we have not notified you, or if you are concerned about the security of your data, please contact our dedicated security team at security@spglobal.com.
- Contact Information of our China DPO.** You may contact our China Data Protection Officer at privacy@spglobal.com or DPOChina@spglobal.com or, at: 49/F, Fortune Financial Center, No.5, Dongsanhuan Zhong Rd, Chaoyang District, Beijing. You may also exercise your rights in relation to personal information transferred overseas or request closure of an account which is registered with S&P Global through the method specified under the section of this Policy titled, "**What are your data protection rights?**".

Japan

This Japan Addendum ("Japan Addendum") supplements this Policy to the extent that the Act on the Protection of Personal Information ("APPI") applies in relation to the processing of personal information in Japan by S&P Global Ratings Japan Inc., S&P Global SF Japan Inc., Standard & Poor's International LLC, Japan Branch, IHS Markit Japan GK (together "S&P Global Japan") and/or S&P Global entities located outside Japan. If there are any inconsistencies between this Japan Addendum and the rest of this Policy in relation to S&P Global's processing of personal information subject to the APPI, this Japan Addendum prevails.

S&P Global will comply with applicable Japanese data protection laws and regulations and will not use personal information for purposes which are not set forth in this Policy or otherwise communicated to the data subject. The process for submitting a claim or request is set out in this Policy.

Joint-use of personal information inside the S&P Global Group

S&P Global Japan jointly uses personal information with other entities in the S&P Global group who may use personal information to provide information about our Services to our clients and related support and training, conduct certain market research, contact clients, or engage in other activities detailed in this Policy. S&P Global Japan may also have certain products that collect business information about individuals in Japan. Such information includes: address, name, company name, department name, job title, phone number, fax number, e-mail address, billing information, history of personnel changes and professional employment history, records of job interviews with S&P Global Japan, your areas of interest, etc.

A list of our group companies is available [here](#).

Name, address and name of representative of the person responsible for Personal information handling business operator and the management of said personal data

S&P Global Ratings Japan Inc., S&P Global SF Japan Inc.
Marunouchi Kitaguchi Bldg. 28th Floor, 1-6-5 Marunouchi, Chiyoda-ku, Tokyo 100- 0005
Representative Director Takenari Yamamoto

Standard & Poor's International LLC Japan Branch
Marunouchi Kitaguchi Bldg. 28th Floor, 1-6-5 Marunouchi, Chiyoda-ku, Tokyo 100- 0005
Representative in Japan Sachiko Katayama

IHS Markit Japan GK
3-1-1 Kyobashi, Chuo-ku, Tokyo 104-0031

Contact information regarding handling of personal information

If you have any questions or concerns about our disclosure, correction, deletion, utilization, or other processing of your personal information (including how we secure your personal information), please contact our Privacy Compliance team via email at privacy@spglobal.com or Japanprivacy@spglobal.com or via mail, at: Marunouchi Kitaguchi Bldg. 28th Floor, 1-6-5 Marunouchi, Chiyoda-ku, Tokyo 100- 0005, Tel: +81-(0)3-4550-8000.

State of California, United States of America

This State of California, United States of America Addendum ("California Addendum") supplements this Policy to the extent the California Consumer Privacy Act as amended by the California Privacy Rights Act ("CCPA") applies in relation to the processing of personal information of residents of the State of California in the United States of America by S&P Global. In case of any inconsistencies between this California Addendum and the rest of this Policy, this California Addendum prevails.

Certain information we collect may be exempt from the CCPA because it is considered public information (e.g., it is made available by a government entity) or covered by a federal privacy law, such as the Gramm-Leach-Bliley Act, the Health Insurance Portability and Accountability Act, the Fair Credit Reporting Act or the Driver Privacy Protection Act.

"Shine the Light" Law

Residents of the State of California also have the right to request information regarding third parties to whom the company has disclosed certain categories of personal information during the preceding year for the third parties' direct marketing purposes.

How to Submit a Request

To submit a request to exercise your rights (or to submit a request on behalf of a consumer as an authorized agent):

- (1) For right to know, access, correct, or deletion requests, complete and submit the [Data Request Form](#).
- (2) For opt-out of sale requests, visit "[Do Not Sell My Personal Information](#)" or call us at 1-855-529-1761.

For information about the requests we receive, including the number of requests and the average number of days we've taken to respond to requests, please click [here](#).

The following is a summary of our data collection practices, including the personal information we collect, whether we disclose that information for a business purpose, and whether we "sell" and/or "share" (as those terms are defined by California law). We may use all the information for any of the purposes described in the Policy unless limitations are listed. S&P Global "shares" or "sells" personal information to third parties in very limited circumstances. To learn more about what brands share or sell personal information, please see below. As discussed elsewhere in the Privacy Policy, we use cookies and similar tracking technologies for purposes of targeted advertising. For more information, please see our [Cookie Notice](#). The categories we use to describe the information are those set out in the CCPA.

| Category of Personal Information | Category of Recipients | | |
|---|--|--|--|
| | Disclosures for a Business Purpose | Sharing for Cross-Context Behavioral Advertising | Sales |
| Identifiers – this may include real name, alias, postal address, unique personal identifier, online identifier, email address, account name, or other similar identifiers. | <ul style="list-style-type: none">• Affiliates or subsidiaries• Business partners• Data analytics providers• Data brokers | <ul style="list-style-type: none">• Advertising networks | <ul style="list-style-type: none">• Business partners• Data analytics providers• Data brokers• Advertising networks |

| | | | |
|--|--|--|---|
| | <ul style="list-style-type: none"> • Internet service providers • Joint marketing partners • Operating systems and platforms • Other Service Providers • Payment processors and financial institutions • Professional services organizations, this may include auditors and law firms • Social networks | | |
| Government Issued Identification – this may include social security number, driver’s license number, or state issued identification number, passport number. | <ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Other Service Providers | Not shared. | Not sold. |
| Financial Information – this may include bank account number, credit card number, debit card number, and other financial information. | <ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Payment processors and financial institutions • Other Service Providers | Not shared. | Not sold. |
| Characteristics of protected classifications – this may include age, sex, race, ethnicity, physical, or mental handicap, etc. | <ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners | Not shared. | <ul style="list-style-type: none"> • Business partners • Data analytics providers • Data brokers Advertising networks |
| Commercial information – this may include information about products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies. | <ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Data analytics providers • Data brokers • Other Service Providers | <ul style="list-style-type: none"> • Advertising networks | <ul style="list-style-type: none"> • Business partners • Data analytics providers • Data brokers • Advertising networks |
| Internet or other electronic network activity information – this may include browsing history, search history, and information regarding an individual’s interaction with an internet website, application, or advertisement. | <ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Data analytics providers • Internet service providers • Operating systems and platforms • Other Service Providers | Not shared. | <ul style="list-style-type: none"> • Business partners • Data analytics providers • Data brokers • Advertising networks |
| Geolocation data | <ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Data analytics providers • Operating systems and platforms • Other Service Providers | Not shared. | Not sold. |

| | | | |
|--|---|-------------|---|
| Audio, electronic, visual, thermal, olfactory, or similar information | <ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Other Service Providers | Not shared. | Not sold. |
| Professional or employment-related information | <ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Other Service Providers | Not shared. | <ul style="list-style-type: none"> • Business partners • Advertising networks |
| Non-public education information (as defined in the Family Educational Rights and Privacy Act) | <ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Other Service Providers | Not shared. | Not sold. |
| Inferences drawn from any of the information listed above | <ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Other Service Providers | Not shared. | Not sold. |
| Additional categories of personal information described in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)) – this may include signature, physical characteristics, or description, insurance policy number. | <ul style="list-style-type: none"> • Affiliates or subsidiaries • Business partners • Payment processors and financial institutions • Other Service Providers | Not shared. | Not sold. |

California Sensitive Information Disclosure. We collect the following categories of sensitive personal information (as defined under California law): Social security, driver’s license, state identification card, or passport number; precise geolocation; Racial or ethnic origin, religious, or philosophical beliefs, or union membership; health information; and sex life or sexual orientation. This information is collected in order to process transactions, comply with laws, manage our business, or provide you with services. Note that we do not use such information for any purposes that are not identified within the California Privacy Rights Act Section 1798.121. We do not “sell” or “share” sensitive personal information for purposes of cross-context behavioral advertising.

Below is a list of brands that sell or share personal information with third parties:

- Polk (<https://ihsmarkit.com/products/polk-automotive-solutions.html>)
- Ipreo (<https://ihsmarkit.com/products/brst-bd-advanced.html>)
- Money Market Directories (<https://products.mmdwebaccess.com/>)
- Capital IQ Pro (<https://www.capitaliq.spglobal.com/>)
- Capital IQ (<https://www.capitaliq.com/>)
- XpressFeed (<https://www.spglobal.com/marketintelligence/en/solutions/xpressfeedtm>)
- Panjiva Platform (<https://panjiva.com/platform>)

S&P Global has no actual knowledge that it sells or shares the personal information of consumers under 16 years of age.

Brazil

This Brazil Addendum ("Brazil Addendum") supplements this Policy to the extent that the General Data Protection Law of Brazil ("LGPD") applies in relation to the processing of personal information by S&P Global. In case of any inconsistencies between this Brazil Addendum and the rest of this Policy, this Brazil Addendum prevails.

Under the LGPD, you have the right to:

- confirm the existence of processing of your personal data;
- access your personal data;
- correct incomplete, inaccurate, or out of date personal data;
- anonymize, block, or delete unnecessary or excessive personal data or personal data that is not being processed in compliance with the LGPD;
- portability of your personal data to another service or product provider, by means of an express request;
- delete personal data processed with your consent;
- information about public and private entities with which we have shared your personal data;
- information about the possibility of denying consent and the consequences of such denial;
- revoke consent;
- request review of decisions taken solely on the basis of automated processing of personal data that affects your interests.

You or an authorized agent may exercise your rights through the [Personal Data Request Form](#). The LGPD also provides that you may file a complaint regarding your data directly with the Brazilian data protection regulator.

Data Protection Officer

c/o Commercial Legal
Rua do Passeio 38/40
Rio de Janeiro
Brazil

Colombia

This Colombia Addendum ("Colombia Addendum") supplements this Policy to the extent that the law of Colombia applies in relation to the processing of personal information by S&P Global. In case of any inconsistencies between this Colombia Addendum and the rest of this Policy, this Colombia Addendum prevails.

Data Subject Rights

Subject to applicable law, you have the right to:

- freely access your personal information;
- know, update, and correct personal information when data is inexact, incomplete, fragmented, misleading, or where processing is not authorized or prohibited;
- request proof of authorization to process your personal information, unless exempted under applicable law;
- bring complaints to the Superintendent of Industry and Commerce;
- revoke authorization and/or require the deletion of personal information when there is not a legal or contractual reason to keep the personal information; and
- decline authorization for the processing of sensitive personal information. The provision of sensitive personal information or the personal information of minors is optional.

Principal Place of Business

ACTIVE 682795966v2

S&P Global Colombia SAS (NIT #900.505.649-2) has its principal place of business at Carrera 19 A No. 90-13, Bogota, Colombia

Republic of South Africa

This South African Addendum (“South African Addendum”) applies in relation to the processing of personal information by the S&P Global responsible parties listed below in the Republic of South Africa and supplements the information set out above in this Policy. In case of any inconsistencies between this South African Addendum and the rest of this Policy, this South African Addendum prevails.

1. Responsible Parties

S&P Global responsible parties that may process personal information from time to time include:

- SPGI Indices UK (Incorporated in United Kingdom) External Profit Company South Africa, registration number 2013/147353/10
- SPGI UK (Incorporated in England) External Profit Company, registration number 2012/065136/10
- S&P Global Ratings Europe Limited (Incorporated in Ireland) External Profit Company, registration number 2017/655416/10
- S&P Global Ipreo Limited (Incorporated in United Kingdom) External Profit Company, registration number 2005/035402/07

2. Personal information of juristic persons

In addition to the individual’s personal information collected as set out in this Policy, we process information relating to South African juristic persons, which may constitute personal information for purposes of the Protection of Personal Information Act of South Africa. The personal information relating to South African juristic persons we process includes:

- A company’s or other juristic person’s name, address, telephone number, email address, company registration number, and company contact’s name;
- A company’s or other juristic person’s incorporation documents, tax numbers, audited financial statements, B-BBEE certificates, and bank account records;
- A company’s or other juristic person’s representative’s details, including their name, email, telephone numbers, job title, job function and details relating to the area of work;
- A company’s or other juristic person’s product or specification requirements; and
- Information related to product support interaction and product training information, to the extent that this information is identifiable.

We collect the information directly from the juristic person concerned or its representatives during negotiation, when preparing and concluding agreements and during implementation or use of products/services for their users. We may also collect the information from the client’s employee users when they register and use products/services or obtain the information that has been made publicly available via the internet and website searches or when the client’s employee user otherwise gives S&P Global their contact details.

3. Purposes and legal basis for the processing of personal information of juristic persons

The purposes of the processing of the abovementioned personal information include:

- To identify clients and prospective customers;
- To market and sell products to clients;
- To negotiate and enter into contracts with clients;
- To obtain permission from clients and their users;
- To conduct training and to provide support to clients/users;
- To record client engagements and conversations;
- To invoice and collect from clients and account for client revenue;
- To comply with applicable statutory obligations; and
- To carry out and manage our business operations and for any other legitimate business purposes.
- In connection with our products and services

Generally, we process the above personal information for purposes of the performance of a contract with a client, or where we have the consent of the client or the juristic person concerned, or on the basis that it is in our legitimate interests or that of a third party to whom the information is supplied for purposes of, amongst other things, marketing and selling our products and services, supporting client access to and use of our products, providing training to users of our products, responding to client or user queries, improving products and services, advising users of product features, new releases or maintenance.

The personal information of juristic persons may be shared with third parties and transferred to countries outside of South Africa. Please see the relevant provisions of the Policy in this regard.

4. Laws authorizing or requiring the collection of personal information.

The legislation in terms of which personal information of individuals or juristic persons may be required to be processed includes:

- The Financial Intelligence Centre Act, 2001;
- The Income Tax Act, 1962; and
- The Company's Act, 2008.

5. Sensitive Personal Information.

To the extent applicable, information relating to an individual's religious or philosophical beliefs, race or ethnic origin, trade union membership, political persuasion, health or sex life, biometric information or criminal behavior, including any photographs or video recordings of may be considered as sensitive/special personal information in accordance with applicable South African law and regulations. We will use an individual's special personal information for the purposes as stated in this Privacy Policy, or as otherwise as notified to you from time to time.

6. Contact us. If you have any questions or concerns about this Addendum or the Policy you may contact the Information Officer at privacy@spglobal.com, or in accordance with the information provided in the Policy under "How to contact us". We will reply to your request within a reasonable period of time and in any event within 30 days. We may require you to verify your identity.