



**California Consumer Privacy Act Annual Notice  
California Resident Web-Users (“CCPA Notice”)**

Last Updated: January 2020

In this annual CCPA Notice, we, the Credit Suisse entities listed in Appendix 1 below, disclose information about our data processing practices with respect to users of our [www.creditsuisse.com](http://www.creditsuisse.com) website, as required by the California Consumer Privacy Act of 2018 (“CCPA”).

Please note that this CCPA Notice applies only to California residents. The information and rights set forth in this CCPA Notice are in addition to and do not replace the information and rights set forth in the “Data Protection Statement” available on the homepage of Credit Suisse’s website, which may be updated from time to time, located here <https://www.credit-suisse.com/us/en/legal/privacy-and-cookie-policy.html> (“Point of Collection Notice”). To the extent that the rights set forth in the Point of Collection Notice conflict with those of the CCPA Notice, the more protective terms shall apply.

This CCPA Notice is effective January 1, 2020, and you can download a PDF version here: <https://www.credit-suisse.com/us/en/legal/privacy-statement.html>.

**I. Who and what information is subject to this CCPA Notice?**

California resident web-users are protected as "consumers" by the CCPA with respect to personal information. A number of statutory exceptions apply under the CCPA and to this CCPA Notice, including the following:

- (1) personal information reflecting a written or verbal communication or a transaction between the business and the consumer, where the consumer is a natural person who is acting as an employee, owner, director, officer, or contractor of a company, partnership, sole proprietorship, non-profit, or government agency and whose communications or transaction with the business occur solely within the context of the business conducting due diligence regarding, or providing or receiving a product or service to or from such company, partnership, sole proprietorship, non-profit, or government agency;
- (2) personal information that is collected by a business about a natural person in the course of the natural person acting as a job applicant to, an employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the natural person’s personal information is collected and used by the business solely within the context of the natural person’s role or former role as a job applicant to, employee of, owner of, director of, officer of, medical staff member of, or contractor of that business;
- (3) personal information that is collected by a business that is emergency contact information of the natural person acting as a job applicant to, employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the personal information is collected and used solely within the context of having an emergency contact on file; and

(4) personal information that is necessary for the business to retain to administer benefits for another natural person relating to the natural person acting as a job applicant to, employee of, owner of, director of, officer of, medical staff member of, or contractor of that business to the extent that the personal information is collected and used solely within the context of administering those benefits.

## **II. How can a consumer with a visual disability access this CCPA Notice?**

Consumers who have a visual disability may be able to use a screen reader or other text-to-speech or text-to-Braille tool to review the contents of this CCPA Notice.

## **III. CCPA Notice at Collection**

We are addressing disclosure requirements under California Civil Code §1798.100(b) and California Attorney General Regulations § 999.305 at or before the point of collection through the provision of the “Point of Collection Notice” (as defined above) which describes the categories of personal information we collect and the purposes of such collection.

## **IV. CCPA Privacy Policy (CCPA Notice)**

Beyond the disclosures in the preceding "CCPA Notice At Collection" section, we are providing additional disclosures about consumer rights and our personal information handling practices in the preceding twelve months, as required by the CCPA and regulations of the California Attorney General, including §999.308 (Privacy Policy).

### **1. Right to Know About Personal Information Collected, Disclosed, or Sold**

This CCPA Notice describes the personal information we generally collect, use, disclose, and sell about California residents. You have the right to request that we disclose what personal information we collect, use, disclose, and sell about you specifically (“right to know”). To submit a request to exercise your right to know, call our toll-free phone number at: +1(800) 720-3452 (US) or submit an email request to [us.data-protection@credit-suisse.com](mailto:us.data-protection@credit-suisse.com) and include “California Request to Know” in the subject line. Please specify in your request the details you would like to know, including any specific pieces of personal information you would like to access.

We will ask that you provide certain information to verify your identity, such as a code sent to an email address we may have on file for you. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information you have requested. We will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

## 2. Our Personal Information Handling Practices in 2019

We have set forth below the categories of personal information described in the CCPA for California residents that we may collect, depending on your engagement with our website and what personal information you have provided to us. Not all of these categories may be applicable to you. Other than your IP address, browsing history, and website usage information, we only collect personal information from the categories below if you affirmatively provide us with such personal information.

We set forth in the tables below, for the preceding twelve (12) months, (i) the categories of personal information which may have been collected, (ii) the categories of sources from which the information may have been collected, (iii) the business or commercial purposes for which the information may have been collected, and (iv) the categories of third parties with whom we may have shared the information.

<b>Categories of personal information:</b>
Identifiers <i>(such as, for example, real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, or other similar identifiers).</i>
Any categories of personal information described in Cal. Civ. Code § 1798.80(e) <i>(such as, for example, name, signature, social security number, address, telephone number, passport number, identification card information, insurance policy number, bank account number, credit or debit card number, or other financial information).</i>
Characteristics of protected classifications under California or federal law <i>(such as, for example, age, gender, military or veteran status, marital status, health or disability status, and citizenship).</i>
Commercial information <i>(such as, for example, property, products, or services purchased or considered or other purchasing or consuming histories or tendencies).</i>
Internet or other electronic network activity information <i>(such as, for example, browsing history, search history, and information regarding interactions with a website).</i> *
Geolocation data. *
Sensory information <i>(such as, for example, audio, electronic, visual, or similar information).</i>
Professional or employment-related information.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g; 34 C.F.R. Part 99)) <i>(such as, for example, details about your education and qualifications).</i>
Inferences drawn from any of the above.

*\* For more information about our use of third-party tracking technologies, please see our global “Privacy and Cookie Policy” located here: <https://www.credit-suisse.com/us/en/legal/privacy-and-cookie-policy.html>.*

**Collected personal information may have been used for the following business and commercial purposes:**

We are subject to various legal and regulatory obligations, including prudential and conduct regulation of banks and investment firms, regulation of financial markets, compliance with court orders, investor protection regulations, securities regulations, laws relating to money laundering, terrorism finance restrictions, global sanctions, and tax laws. The purposes of processing may include:

- identity checks, fraud, and financial crime and market abuse prevention or detection;
- fulfilling control and reporting obligations under applicable financial regulations, including securities regulations;
- fulfilling requirements related to our licences and regulatory permissions;
- complying with investor protection or conduct of business regulation (such as carrying out suitability or appropriateness assessments);
- complying with regulatory recordkeeping obligations;
- complying with regulatory obligations in relation to measuring and managing risks within the Credit Suisse organization; and
- carrying on business relationships.

We may process your personal data for the legitimate business and other interests of Credit Suisse, including for the following purposes: with clients and other parties;

- providing services to clients;
- due diligence in relation to transactions with which Credit Suisse affiliates are involved;
- performing obligations and exercising rights under, and otherwise carrying out, contracts, or taking pre-contractual measures with you, your organization, or a third party;
- management of the businesses and further development of the services and products of the Credit Suisse organization;
- reviewing and optimizing procedures for needs assessment for the purpose of direct client discussions;
- marketing or market and opinion research;
- obtaining personal data from publicly-available sources for client acquisition purposes;
- compliance with licensing, permission, and/or licensing exemption requirements and regulatory requests or guidance related to such licenses, permissions, or exemptions;

- compliance with applicable laws, regulations, and judicial orders within and outside the United States;
- compliance with regulatory guidance, policy statements, best practice, and associated policy requirements and controls in connection with the carrying on of Credit Suisse business;
- facilitating and responding to regulatory requests and supervisory visits, and otherwise acting in an open and collaborative manner with competent regulatory authorities;
- prevention of and investigations related to financial crime, including fraud, financing of terrorism, and money laundering, and compliance with sanctions, including know your customer (KYC) and regular politically exposed persons (PEP) screening;
- asserting legal claims and defenses in legal disputes;
- carrying out conflict checks;
- handling client complaints;
- warehousing appropriate information within a single jurisdiction in order to coordinate the services and business activities of the Credit Suisse organization and satisfying other administrative needs across the organization;
- facilitating operational actions in connection with our business relationships (e.g. processing of payments, billing);
- validating the authority of signatories (e.g. when executing agreements and transactions);
- risk control across the Credit Suisse organization;
- consulting with credit rating agencies to investigate creditworthiness and credit risks where we may have an exposure to you;
- securing and operating Credit Suisse's IT systems; and
- video surveillance and measures to protect the rights of an owner of premises to keep out trespassers and to provide site security (e.g. access controls).

Information may be inferred from meal preferences or information you provide to us in surveys or free text fields.

We may process your personal data in order to maintain our business relationship with you in accordance with our legal agreement(s) with you, including in order to carry out obligations or exercise rights we may have pursuant to the legal agreement(s) with you, to take steps necessary in order to conclude a legal agreement with you, or to take other steps at your or your representative's request prior to entering into a legal agreement with you.

There may be circumstances where we ask for your consent to process your personal data.

<b>Personal information may have been collected from the following categories of sources:</b>
We process personal data about you that we obtain from you in the context of our business relationship with you and/or your organization.
We process personal data about you that we obtain from publicly-accessible sources (e.g. press, including trade press or paid-for content, publicly-available websites, and other publicly-available sources of information, such as sanctions lists or lists of directors disqualifications) or that is legitimately transferred to us by other companies in the Credit Suisse organization or from other third parties. These third parties may include your organization as well as third parties not related to you or your organization, such as settlement service providers, central securities depositaries, exchanges, central clearing counterparties, and other similar entities, databases, and third-party service providers (such as professional advisers, insurers, and risk consulting firms).

<b>We may have shared personal information with the following categories of third parties:</b>
Credit Suisse affiliates, including affiliates located outside the United States.
Public entities/institutions (e.g., regulatory, quasi-regulatory, or tax authorities or law enforcement).
Other credit or financial services institutions or corporate institutions.
Third parties in connection with transactions with which Credit Suisse is involved (e.g., correspondent banks, brokers, exchanges, or central clearing parties).
Prospective buyers; persons or entities for whom you have given consent to transfer personal data.
Professional advisors (e.g., law firms, accountants, auditors, and tax advisors).
Insurers.
Service providers and agents approved by Credit Suisse (e.g., for purposes such as IT services, logistics, printing, telecommunications, consulting, sales and marketing, and translations).

**3. Disclosures of Personal Information, No Sale**

We may have disclosed certain categories of California residents’ personal information to the categories of third parties as shown in the table above. We do not and will not sell California residents’ personal information.

#### **4. Right to Request Deletion of Personal Information**

You have a right to request the deletion of personal information that we collect or maintain about you. To submit a request to delete personal information, please call: +1(800) 720-3452 (US) or submit an email request to [us.data-protection@credit-suisse.com](mailto:us.data-protection@credit-suisse.com) and include “California Request to Delete” in the subject line. Please specify in your request the personal information about you that you would like to have deleted, which can be all of your personal information.

We will ask that you provide certain information to verify your identity, such as a code sent to an email address we may have on file for you. If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue. Once we have verified your identity, we will ask you to confirm that you wish to have your personal information deleted. Once confirmed, we will respond to your request in accordance with the CCPA. If we deny your request, we will explain why.

#### **5. Right to Opt-Out of the Sale of Personal Information**

Under the CCPA, you have the right to opt-out of the sale of your personal information by a business. However, we do not, and will not, sell your personal information.

#### **6. Right to Non-Discrimination for the Exercise of a Consumer’s Privacy Rights**

You will not be discriminated against, in violation of Cal. Civ. Code §1798.125, because you exercise any of your rights under the CCPA.

#### **7. Authorized Agent**

You can designate an authorized agent to make a request under the CCPA on your behalf if:

- The authorized agent is a natural person or a business entity registered with the Secretary of State of California; and
- You sign a written declaration that you authorize the authorized agent to act on your behalf.

If you use an authorized agent to submit a request to exercise your right to know or your right to request deletion, please have the authorized agent take the following steps in addition to the steps described in Sections 2 and 3 above:

- Email your written declaration authorizing the authorized agent to act on your behalf, certified by a California notary public, to [us.data-protection@credit-suisse.com](mailto:us.data-protection@credit-suisse.com); and
- Provide any information we request in our response to your email to verify your identity. The information that we ask you to provide to verify your identity will depend on your prior interactions with us and the sensitivity of the personal information at issue.

If you provide an authorized agent with power of attorney pursuant to Probate Code sections 4000 to 4465, it may not be necessary to perform these steps, and we will respond to any request from such authorized agent in accordance with the CCPA.

## **8. Contact for More Information**

If you have questions or concerns regarding our privacy policy or practices, you may contact us using the following details:

Email address: [us.data-protection@credit-suisse.com](mailto:us.data-protection@credit-suisse.com)

Postal address:

The Data Protection Office

Five Canada Square

London

E14 5AQ

United Kingdom



## APPENDIX 1 – List of Applicable Credit Suisse Affiliates

3902 South State, LLC	Credit Suisse AG, Cayman Islands Branch	Credit Suisse Asset Management International Holding Ltd
Alpine Securitization LTD	Credit Suisse AG, Dublin Branch	Credit Suisse Capital Funding, Inc.
Boston Insurance SAC Ltd.	Credit Suisse AG, Guernsey Branch	Credit Suisse Commercial Mortgage Securities Corp.
Boston Re Ltd.	Credit Suisse AG, Hong Kong Branch	Credit Suisse Consultoria de Investimentos Ltda.
C. Suisse Asesoria Mexico, S.A. de C.V.	Credit Suisse AG, London Branch	Credit Suisse EMG HoldCo LLC
Column ATC LLC	Credit Suisse AG, Los Angeles Representative Office	Credit Suisse Energy LLC
Column Management LLC	Credit Suisse AG, Milan Branch	Credit Suisse Equities (Australia) Limited
Credit Suisse (Argentina) S.R.L.	Credit Suisse AG, Mumbai Branch	Credit Suisse Financial Services (Israel) Ltd.
Credit Suisse (Hong Kong) Limited	Credit Suisse AG, Nassau Branch	Credit Suisse First Boston (Cayman) Limited
Credit Suisse (Italy) S.p.A.	Credit Suisse AG, New York Branch	Credit Suisse First Boston Canada Legacy Limited
Credit Suisse (Lebanon) Finance S.A.L	Credit Suisse AG, San Francisco Representative Office	Credit Suisse First Boston Data & Analytics LLC
Credit Suisse (Lie) Funds SICAV	Credit Suisse AG, Seoul Branch	Credit Suisse First Boston Finance (Proprietary) Limited
Credit Suisse (Luxembourg) S.A.	Credit Suisse AG, Shanghai Branch	Credit Suisse First Boston Mortgage Capital LLC
CREDIT SUISSE (LUXEMBOURG) S.A. - SUCURSAL EM PORTUGAL	Credit Suisse AG, Singapore Branch	Credit Suisse First Boston Next Fund, Inc.
Credit Suisse (Luxembourg) S.A. Zweigniederlassung Österreich	Credit Suisse AG, Singapore Branch	Credit Suisse First Boston Princeton LLC
Credit Suisse (Luxembourg) S.A., France Branch	Credit Suisse AG, Sucursal en España	Credit Suisse First Boston RAFT, LLC
Credit Suisse (Luxembourg) S.A., Ireland Branch	Credit Suisse AG, Sydney Branch	Credit Suisse First Boston Securities Cairo S.A.E.
Credit Suisse (Luxembourg) S.A., Netherlands Branch	Credit Suisse AG, Taipei Securities Branch	Credit Suisse Gestion S.G.I.I.C., S.A.
Credit Suisse (Qatar) LLC	Credit Suisse AG, Tokyo Branch	Credit Suisse Group Finance (U.S.) Inc.
Credit Suisse (Schweiz) AG	Credit Suisse AG, Toronto Branch	Credit Suisse Guernsey AF Trust
Credit Suisse (Singapore) Limited	Credit Suisse Agencia de Valores (Chile) Limitada	Credit Suisse Hank Holdings LLC
Credit Suisse (UK) Limited	Credit Suisse Asesoramiento y Servicios S.A.	Credit Suisse Holdings (USA), Inc.
Credit Suisse AG	Credit Suisse Asset Management (UK) Holding Limited	Credit Suisse Hypotheken AG
Credit Suisse AG (DIFC Branch)	Credit Suisse Asset Management Immobilien Kapitalanlagegesellschaft mbH	Credit Suisse Insurance Broker AG
Credit Suisse AG, Bahrain Branch		Credit Suisse InvestLab 2 AG

Credit Suisse Investment Management (Shanghai) Co., Ltd.	CSH Parent C3 LLC	New Atlantic Holdings (South Africa) (Pty) Ltd.
Credit Suisse IP GmbH	CSH Parent LLC	New TR Holdings LLC
Credit Suisse Istanbul Menkul Degerler A.S.	CSH Parent.2 LLC	Opportunity Funding I LLC
Credit Suisse Labs GmbH	CSMCM 2016-RPL1 Trust	Redwood Guernsey I Funding Trust
Credit Suisse Labs GmbH, San Francisco Branch	CSMCM 2017-RPL1 Trust	Redwood Guernsey I Master Trust
Credit Suisse Lending Trust (USA)	CSMCM 2017-RPL2 Trust	Redwood Guernsey I SPIA Trust
Credit Suisse Lending Trust (USA) 2	CSMCM 2017-RPL3 Trust	Redwood Guernsey II Funding Trust
Credit Suisse Lending Trust (USA) 4	CSMCM 2018-RPL1 Trust	Redwood Guernsey II Master Trust
Credit Suisse Lending Trust (USA) 5	CSMCM 2018-RPL10 Trust	Redwood Guernsey II SPIA Trust
Credit Suisse Life & Pensions AG	CSMCM 2018-RPL11 Trust	Residential RealEstate Review Services, Inc.
Credit Suisse Life & Pensions AG, Italy Branch	CSMCM 2018-RPL12 Trust	Residential RealEstate Review, Inc.
Credit Suisse Life (Bermuda) Ltd.	CSMCM 2018-RPL2 Trust	RRR Appraisal Services, Inc.
Credit Suisse Life Settlements LLC	CSMCM 2018-RPL3 Trust	Sail Guernsey I Funding Trust
Credit Suisse Management LLC	CSMCM 2018-RPL4 Trust	Sail Guernsey I Master Trust
Credit Suisse Nominees (Guernsey) Limited	CSMCM 2018-RPL6 Trust	Sail Guernsey I SPIA Trust
Credit Suisse Premium Finance LLC	CSMCM 2018-RPL7 Trust	Sail Guernsey II Funding Trust
Credit Suisse PSL GmbH	CSMCM 2018-RPL8 Trust	Sail Guernsey II Master Trust
Credit Suisse Saudi Arabia	CSMCM 2018-RPL9 Trust	Sail Guernsey II SPIA Trust
Credit Suisse Securities (Europe) Ltd, Seoul Branch	CSMCM 2018-SP2 Trust	Select Portfolio Servicing, Inc.
Credit Suisse Securities (Japan) Limited	CSMCM 2018-SP3 Trust	Signac, LLC
Credit Suisse Securities (Thailand) Limited	CSMCM 2019-RPL3 Trust	SP Holding Enterprises Corp.
Credit Suisse Securities (USA) LLC	CSMCM 2019-RPL5 Trust	Special Situations Holdings IX LLC-Icon
Credit Suisse Services (USA) LLC	CSMCM 2019-SPL1 Trust	SPS Advance Funding LLC
Credit Suisse Services AG	CSSEL Guernsey Bare Trust	STARs Master Trust
Credit Suisse/Solargenix SPV, LLC	CST Pensions Limited	STARs Series I Trust
CSAM Americas Holding Corp.	DLJ Bridge Finance, Inc.	Terminus Insurance, Inc.
CSFB Canada Holding Corporation	DLJ Long Term Investment Corporation	Wake Holdings LLC
CSFB Holt LLC	DLJ Mortgage Capital, Inc.	
CSFB Reinsurance Intermediaries LLC	JSC "Bank Credit Suisse (Moscow)"	
	Merban Equity AG	