

PRIVACY NOTICE

Last updated: April 26, 2023

Harris considers the preservation of your privacy a priority. This Privacy Notice (“Notice”) applies to website visitors, users, and current, former or prospective clients of Harris Associates L.P. and Harris Associates Securities L.P. (collectively “Harris”). This Notice explains how we may collect, use, share and otherwise process personal information in connection with your use of our website located at harrisassoc.com (the “Site”) and our services (collectively, the “Services”) and the rights and choices that may be available to you with respect to your information.

If you do not agree to the terms of this Notice, you must immediately cease your use of the Services. We may update this Notice from time to time, and your use of the Services constitutes your express acceptance to the terms of the then-posted version of this Notice.

Information Collection

We collect personal information you provide to us, or that we receive from business partners, social media platforms, other users, and other publicly available sources. The information we collect includes, without limitation:

Information you provide to us. Personal information about you that we collect from you through the Services or otherwise may include:

- **Contact data**, such as your first and last name, email and mailing addresses.
- **Identity data**, such as a social security number (where permitted), tax identification number, passport number, driver’s license or state ID number, and images of or details from the relevant identification cards (such as identifying numbers, date of birth, country and date of issuance, and expiration date).
- **Account data**, such as your email address and password that you may set up to establish an account with us.
- **Financial data**, such as your stated income, economic or financial status (including source of funds), financial institution, financial account names and numbers, investor profile and information pertaining to your eligibility to invest, and payment information.
- **Transaction data**, such as purchases, sales and account balances.
- **Data about others**, such as the name, address, email address and other contact details, date of birth, social security number (where permitted) or other tax or national identification number of your organization’s individual representatives, underlying investors and/or beneficial owners, and control persons, where applicable.
- **Communications data**, such as your preferences for receiving communications about our activities and publications, and details about how you engage with our Site and communications.

- **Feedback data**, such as information you provide, and content that you upload when you contact us with questions, feedback, upload attachments, or otherwise correspond with us online (including on our social media pages).
- **Other information** that is not specifically listed here, which we will use in accordance with this Notice or as otherwise disclosed at the time of collection.

Data from other sources. We may combine personal information we receive from you with personal information we obtain from other sources, such as:

- **Publicly-available sources**, such as social media platforms.
- **Business partners**, such as joint marketing partners, affiliates and event co-sponsors.

Data collected automatically. We, our service providers and third-party partners may automatically log information about you, your computer or mobile device, and your activity over time on the Site and other online services, including:

- **Device data**, such as your computer or mobile device operating system type and version number, manufacturer and model, browser type, screen resolution, IP address, the website you visited before browsing our Site, and general location information, such as city, state or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.

Cookies

Harris uses cookies and similar technologies to facilitate the automated collection of certain data that is outlined above. These technologies are used to help improve the online experience for users. Each cookie is a small text file that the Site downloads onto a user's device. The cookies we use contain information that identifies your computer and stores data about your visits to the Site during and after your visit.

- **Analytical/performance cookies** allow us to identify how and when pages of our Site are visited, recognize our visitors' technology preferences and ensure that the Site is working properly. For those purposes, we use cookies set by Google Analytics (utma, utmb, utmc, utmt and utmz). This information is compiled to help make improvements to our websites. To read more about this third-party cookie, including the provider's privacy statement, please visit www.google.com/analytics.
- **Session cookies** allow the site to 'remember' content from page to page. These cookies expire when the user leaves the site or closes the browser.
- **Log cookies** are collected to optimize page load timing in our websites (sometimes referred to as real-user monitoring or RUM). We use New Relic to collect those cookies when session

tracking in end-user browsers. To read more about this third-party cookie, please visit <https://docs.newrelic.com/docs/browser>.

Use of Information

We use your personal information for the following purposes and as otherwise described in this Notice or at the time of collection:

Service delivery. We use your personal information to:

- provide, operate and improve the Services;
- establish and maintain your user profile on the Services;
- communicate with you about the Services, including by sending you announcements, updates, security codes, security alerts, and support and administrative messages;
- communicate with representatives of our clients and other relevant parties in connection with providing Services;
- enable security features of the Site, such as remembering devices from which you have previously logged in;
- understand your needs and interests, and personalize your experience with the Site and our communications;
- protect the security of the Site and our systems; and
- provide support for the Services, and respond to your requests, questions and feedback.

Research and development. We may use your personal information for research and development purposes, including to analyze and improve the Services and our business. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We make personal information into anonymous data by removing information that makes the data personally identifiable to you. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Services and promote our business.

Marketing. We may send you Harris-related marketing communications as permitted by law. You will have the ability to opt-out of our marketing and promotional communications as described in the “Options” section below.

Compliance and operations. We may use your personal information to:

- operate our business;
- comply with applicable laws, lawful requests, and legal process, such as to respond to subpoenas or requests from government authorities.
- protect our, your or others’ rights, privacy, safety or property (including by making and defending legal claims);
- audit our internal processes for compliance with legal and contractual requirements and internal policies;
- enforce the terms and conditions that govern the Services; and
- prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

We do not sell personal information. In addition, we do not disclose any personal information about you to anyone, except as permitted or required by law or as permitted by you in writing.

Sharing of Information

We may share your personal information with the following parties and as otherwise described in this Notice or at the time of collection:

Affiliates. Our corporate parent, subsidiaries, and affiliates, for purposes consistent with this Notice.

Service providers. Companies and individuals that provide services on our behalf or help us operate the Services or our business (such as IT, hosting, email delivery, marketing, and event management services).

Service-related third parties. Brokers, custodians, distributors, transfer agents, attorneys, auditors, administrators, investment funds and their respective managers and other non-affiliated third parties as necessary to provide the Services.

Professional advisors. Professional advisors, such as lawyers, auditors and insurers, where necessary in the course of the professional services that they render to us.

Authorities and others. Law enforcement, government authorities, central banks and private parties, as we believe necessary or appropriate for the compliance and operations purposes described above.

Business transferees. We may disclose personal information in the context of actual or prospective business transactions (e.g., investments in Harris, financing of Harris, public stock offerings, or the sale, transfer or merger of all or part of our business, assets or shares), for example, we may need to share certain personal information with prospective counterparties and their advisers. We may also disclose your personal information to an acquirer, successor, or assignee of Harris as part of any merger, acquisition, sale of assets, or similar transaction, and/or in the event of an insolvency, bankruptcy, or receivership in which personal information is transferred to one or more third parties as one of our business assets.

Options

Opt out of marketing communications. If at any time you wish to opt-out of future newsletters or other promotional emails, you may click the “unsubscribe” link in the email or otherwise contact us at dataprivacy@harrisassoc.com. It may take up to 10 business days before you stop receiving promotional emails. This opt-out does not apply to operational communications, for example, order confirmation emails.

Access, update or delete information. If you have registered for an account with us, you may review, update or delete certain personal information in your account profile by contacting us at dataprivacy@harrisassoc.com.

You may also contact us in writing if you want to access or receive a copy of your personal information or would like rectify or delete your information.

These rights are not absolute, and we reserve the rights to verify your identity upon receiving such a request and decline your request. If we are unable or not willing to comply with your request, either in

whole or in part, we will inform you. Please know that deletion of some personal information may prevent your further use of our Services.

Cookies & browser web storage. Most browsers let you remove or reject cookies. To do this, follow the instructions in your browser settings. Many browsers accept cookies by default until you change your settings. Please note that if you set your browser to disable cookies, the Site may not work properly. Similarly, your browser settings may allow you to clear your browser web storage. For more information about cookies, including how to see what cookies have been set on your device and how to manage and delete them, visit www.allaboutcookies.org.

Do Not Track. Some Internet browsers may be configured to send “Do Not Track” signals to the online services that you visit. We currently do not respond to “Do Not Track” signals. To find out more about “Do Not Track,” please visit <http://www.allaboutdnt.com>.

How We Secure Your Information

We maintain a number of technical, administrative, physical, electronic and procedural safeguards designed to protect the confidentiality and security of your personal information. However, security risk is inherent in all internet and information technologies and we cannot guarantee the security of personal information.

If you have an account with us, your account is protected by a password that you select. It is your responsibility to protect your password appropriately and to limit access to your computer or device and browser by, among other things, signing off after you have finished accessing your account.

Third Party Sites

The Site may contain links to third party websites. These links are not an endorsement of, or representation that we are affiliated with, any third party. We cannot control, and take no responsibility for, the content or privacy practices of such third-party websites. Please carefully review the privacy policy and any other applicable terms for such third-party websites.

Children

The Services are not intended for use by anyone under 18 years of age. If you are a parent or guardian of a child from whom you believe we have collected personal information in a manner prohibited by law, please contact us. If we learn that we have collected personal information through the Service from a child without the consent of the child’s parent or guardian as required by law, we will comply with applicable legal requirements to delete the information.

Notice Updates

We reserve the right to modify this Notice at any time. If we make material changes to this Notice, we will notify you by updating the date of this Notice and posting it on the Site or making it available through the Services. If required by law we will also provide notification of changes in another way that we believe is reasonably likely to reach you, such as via email or another manner through the Service. Any modifications to this Notice will be effective upon our posting the modified version (or as otherwise

indicated at the time of posting). In all cases, your use of the Service after the effective date of any modified Notice indicates your acceptance of the modified Notice.

Contact Us

Consumers, including clients, prospects, third parties and employees, can exercise their rights described in the “Options” section by filling out an [online form](#) or by contacting us:

Harris Associates L.P.
Compliance – Privacy Officer
111 S. Wacker Dr. #4600
Chicago, IL 60606
Main Phone: 1-312-646-3600
Toll Free: 1-888-646-3469
dataprivacy@harrisassoc.com

Updates to the Privacy Notice. Although most changes are likely to be minor, this Privacy Notice may be changed to keep it aligned with business operations.

Identity verification. In some cases, Harris may need to ask for proof of identification before the request can be processed. Harris will inform the consumer if he/she needs to verify his/her identity and the documents it requires before providing a substantive response to the request.

Notice to California Residents

Except as otherwise provided, this section applies to residents of California and provides additional information to residents pursuant to the California Consumer Privacy Act (“CCPA”).

This section describes how we collect, use, and share Personal Information of California residents and the rights these users may have with respect to their Personal Information. Please note that not all rights listed below may be afforded to all users and that if you are not a resident of California, you may not be able to exercise these rights. In addition, we may not be able to process your request if you do not provide us with sufficient detail to allow us to confirm your identity or understand and respond to it.

For purposes of this section, the term “Personal Information” and “Sensitive Personal Information” have the meanings given in the CCPA, and such terms exclude information exempted from the scope of the CCPA.

In some cases, we may provide a different privacy notice to certain categories of California residents, such as job applicants, in which case that notice will apply instead of this section.

This CCPA Notice applies only to California residents whose interactions with us are limited to:

- a. visiting the Site,
- b. signing up for email alerts and other electronic communications, or
- c. establishing an account that does not include financial products or services.

This Notice does not apply to the personal information we collect, use or disclose about California residents who are former or current clients because this information is subject to the federal Gramm-Leach-Bliley Act (“GLBA”) and implementing regulations, or the California Financial Information Privacy Act (“FIPA”).

Personal Information That We Collect and Use

The list below summarizes the personal information we collect and use by reference to the categories specified in the CCPA, and describes our practices during the 12 months preceding the effective date of this Notice. Information you voluntarily provide to us, such as in free-form webforms, may contain other categories of personal information not described below.

| Statutory category of personal information (“PI”) (Cal. Civ. Code § 1798.140) | PI we collect in this category (See Personal information we collect above for description) | Source of PI | Business/ commercial purpose for collection | Categories of third parties to whom we “disclose” PI for a business purpose |
|--|--|---|---|--|
| <u>Identifiers</u> | <ul style="list-style-type: none">• <i>Contact data</i>• <i>Identity data</i>• <i>Account data</i> | <ul style="list-style-type: none">• <i>You</i>• <i>Other third-party sources</i> | <ul style="list-style-type: none">• <i>Service delivery</i> | <ul style="list-style-type: none">• <i>Affiliates</i>• <i>Service providers</i> |

| Statutory category of personal information (“PI”) (Cal. Civ. Code § 1798.140) | PI we collect in this category (See Personal information we collect above for description) | Source of PI | Business/commercial purpose for collection | Categories of third parties to whom we “disclose” PI for a business purpose |
|---|---|---|--|--|
| | <ul style="list-style-type: none"> • <i>Data about others</i> | | <ul style="list-style-type: none"> • <i>Research & development</i> • <i>Marketing</i> • <i>Advertising</i> • <i>Compliance & operations</i> | <ul style="list-style-type: none"> • <i>Advertising partners</i> • <i>Service-related third parties</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> |
| <u>California Customer Records</u> (as defined in California Civil Code section 1798.80) | <ul style="list-style-type: none"> • <i>Contact data</i> • <i>Identity data</i> • <i>Account data</i> • <i>Financial data</i> • <i>Transaction data</i> • <i>Data about others</i> • <i>Engagement data</i> • <i>Feedback data</i> • <i>Device data</i> • <i>Online activity data</i> | <ul style="list-style-type: none"> • <i>You</i> • <i>Other third-party sources</i> | <ul style="list-style-type: none"> • <i>Service delivery</i> • <i>Research & development</i> • <i>Marketing</i> • <i>Advertising</i> • <i>Compliance & operations</i> | <ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Advertising partners</i> • <i>Service-related third parties</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> |
| <u>Commercial Information</u> | <ul style="list-style-type: none"> • <i>Transaction data</i> • <i>Data about others</i> • <i>Engagement data</i> • <i>Feedback data</i> • <i>Online activity data</i> | <ul style="list-style-type: none"> • <i>You</i> • <i>Other third-party sources</i> • <i>Automatic collection</i> | <ul style="list-style-type: none"> • <i>Service delivery</i> • <i>Research & development</i> • <i>Marketing</i> • <i>Advertising</i> • <i>Compliance & operations</i> | <ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Advertising partners</i> • <i>Service-related third parties</i> • <i>Professional advisors</i> • <i>Authorities and others</i> |

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|---|--|---|--|--|
| | | | | <ul style="list-style-type: none"> • <i>Business transferees</i> |
| <u>Financial Information</u> | <ul style="list-style-type: none"> • <i>Financial data</i> • <i>Transaction data</i> | <ul style="list-style-type: none"> • <i>You</i> • <i>Other third-party sources</i> | <ul style="list-style-type: none"> • <i>Service delivery</i> • <i>Research & development</i> • <i>Marketing</i> • <i>Advertising</i> • <i>Compliance & operations</i> | <ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Service-related third parties</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> |
| <u>Online Identifiers</u> | <ul style="list-style-type: none"> • <i>Account data</i> • <i>Device data</i> | <ul style="list-style-type: none"> • <i>You</i> • <i>Other third-party sources</i> • <i>Automatic collection</i> | <ul style="list-style-type: none"> • <i>Service delivery</i> • <i>Research & development</i> • <i>Marketing</i> • <i>Advertising</i> • <i>Compliance & operations</i> | <ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Advertising partners</i> • <i>Service-related third parties</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> |
| <u>Internet or Network Information</u> | <ul style="list-style-type: none"> • <i>Transaction data</i> • <i>Engagement data</i> • <i>Device data</i> • <i>Online activity data</i> | <ul style="list-style-type: none"> • <i>Automatic collection</i> | <ul style="list-style-type: none"> • <i>Service delivery</i> • <i>Research & development</i> • <i>Marketing</i> • <i>Advertising</i> • <i>Compliance & operations</i> | <ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Advertising partners</i> • <i>Service-related third parties</i> • <i>Professional advisors</i> • <i>Authorities and others</i> |

| Statutory category of personal information ("PI") (Cal. Civ. Code § 1798.140) | PI we collect in this category (See Personal information we collect above for description) | Source of PI | Business/commercial purpose for collection | Categories of third parties to whom we "disclose" PI for a business purpose |
|--|--|--------------|--|--|
| | | | | <ul style="list-style-type: none"> • <i>Business transferees</i> |
| <u>Inferences</u> | <i>May be derived from your:</i> <ul style="list-style-type: none"> • <i>Contact data</i> • <i>Identity data</i> • <i>Account data</i> • <i>Financial data</i> • <i>Transaction data</i> • <i>Engagement data</i> • <i>Device data</i> • <i>Online activity data</i> | N/A | <ul style="list-style-type: none"> • <i>Service delivery</i> • <i>Research & development</i> • <i>Marketing</i> • <i>Advertising</i> • <i>Compliance & operations</i> | <ul style="list-style-type: none"> • <i>Affiliates</i> • <i>Service providers</i> • <i>Advertising partners</i> • <i>Service-related third parties</i> • <i>Professional advisors</i> • <i>Authorities and others</i> • <i>Business transferees</i> |
| <u>Protected Classification Characteristics</u> | <i>We do not intentionally collect this information but it may be revealed in identity data or other information we collect</i> | N/A | N/A | N/A |

Sensitive personal information. We do not use or disclose your sensitive personal information in a manner that gives rise to the right to limit use or disclosure of sensitive personal information under the CCPA.

California Residents' Privacy Rights

As a California resident, you have the rights listed below. However, these rights are not absolute, and in certain cases we may decline your request as permitted by law.

- **Information.** You can request the following information about how we have collected, used and shared your personal information during the past 12 months, which we have made available to you without your having to request it by describing it above:
 - The categories of personal information we have collected.
 - The specific pieces of personal information we have collected.
 - The categories of sources from which we collected the personal information.

- The business or commercial purpose for collecting and/or selling personal information.
- The categories of third parties with whom we share the personal information.
- The categories of personal information that we sold or disclosed for a business purpose.
- The categories of third parties to whom the personal information was sold or disclosed for a business purpose.
- **Access.** You can request a copy of the personal information that we maintain about you.
- **Correction.** You can ask us to correct inaccurate Personal Information that we have collected about you.
- **Deletion.** You can ask us to delete the personal information that we collected from you.
- **We do not sell your Personal Information.** We do not sell personal information. As we explain in our Privacy Notice, we use cookies and other tracking technologies to analyze website traffic. If you would like to learn how you may opt out of our use of cookies and other tracking technologies, please review the “Cookies” and “Options” sections of this Notice.
- **Nondiscrimination.** You are entitled to exercise the rights described above free from discrimination as prohibited by the CCPA.

How to Submit a Request

To request access to or deletion of personal information:

- Visit <https://harrisassoc.com/privacy-policy/contact-our-privacy-officer/>
- Call: 1-888-646-3469
- Email: dataprivacy@harrisassoc.com

Verification of Identity; Authorized agents. We may need to verify your identity in order to process your information (e.g., know, access, appeal, correction, or deletion requests) and reserve the right to confirm your residency. To verify your identity, we may require government identification, a declaration under penalty of perjury, or other information, where permitted by law.

Under the CCPA, you may enable an authorized agent to make a request on your behalf. However, we may need to verify your authorized agent’s identity and authority to act on your behalf. We may require a copy of a valid power of attorney given to your authorized agent pursuant to applicable law. If you have not provided your agent with such a power of attorney, we may ask you to take additional steps permitted by law to verify that your request is authorized, such as by providing your agent with written and signed permission to exercise your rights on your behalf, the information we request to verify your identity, and confirmation that you have given the authorized agent permission to submit the request.