



Tocqueville Asset Management, L.P., and Its Affiliates' Privacy Notice for California Residents

This Privacy Notice for California Residents (“Notice”) supplements our general Privacy Notice and applies only to the data of California residents as required by the California Consumer Privacy Act of 2018, as amended (the “CCPA”). The purpose of this Notices to provide you with a comprehensive description of our practices regarding the collection, use, disclosure, and sale of your personal information, if applicable, and of your rights regarding your personal information.

“Personal Information” is information that identifies, relates to, describes, or is reasonably capable of being connected to you or your household. Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data.
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

Collection and Disclosure of Your Personal Information

The scope of “personal information” under the CCPA is broad and includes any information that “identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household”. The 11 enumerated categories of personal information as defined in the CCPA are as follows:

Categories of Personal Information	Examples
Identifiers	Real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers.
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
Characteristics of protected classifications under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical

	conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
Commercial information	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
Biometric information	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.
Internet or other electronic network activity information	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
Geolocation data	Physical location or movements.
Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.
Professional or employment-related information	Current or past job history or performance evaluations.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.
Inferences drawn from any of the information identified above to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We collect most personal information directly from you in person, by telephone, mail, or email. However, we may also collect information:

- From publicly accessible sources (e.g., property records).
- Directly from a third party, e.g., sanctions screening providers, credit reporting agencies, or customer due diligence providers.
- From a third party with your consent (e.g., your bank).

We collect and process your personal information for our everyday business purposes, such as processing your transactions, including wire transfers, opening, and maintaining your account(s). The types of personal information we collect, and share depend on the product or service you have with us. This information can include Social Security number and income; assets and investment experience; and transaction history and wire transfer instructions. We also process your personal data in order to comply with applicable U.S. laws. The basis for such processing is our legitimate interests, as we could not provide you with the required services unless we complied with U.S. laws. We also process your personal data for direct marketing and joint marketing with other financial companies based

on your consent. You maintain the ability to opt out of direct marketing and joint marketing for and on behalf of Tocqueville.

We also obtain personal information about you from other sources, including those publicly accessible, in order to assist us in verifying your identity. We share your personal data with affiliated and nonaffiliated service providers to help conduct our business, and these arrangements are subject to data protection agreements. Our affiliated providers include companies with a “Tocqueville” name, such as Tocqueville Securities, L.P. and Tocqueville Asset Management, L.P. Nonaffiliated providers include financial companies such as broker-dealers, custodians, financial advisers, joint marketing partners who market interests in the funds we distribute and nonfinancial companies such as fulfillment, proxy voting and class action service providers, as well as law enforcement authorities, self-regulatory organizations (e.g., FINRA), and other regulators, as required by law.

No Sale of Personal Information

Tocqueville does not sell personal information and has not sold personal information in the preceding twelve (12) months. To the extent that Tocqueville ever changed its policy and chose to sell personal information, you would have the right to opt-out of the sale of your personal information.

Access to Specific Information Rights

You have the right, subject to certain exceptions defined in the CCPA and other applicable laws and regulations, to request that Tocqueville disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The categories of personal information that each recipient received.
- The specific pieces of personal information we collected about you.

Deletion Request Rights

You have the right, subject to certain exceptions defined in the CCPA and other applicable laws and regulations, to request that Tocqueville delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request we will delete (and direct our service providers to delete) your personal information from our records.

Exercising Access and Deletion Rights

To exercise the access, and deletion rights described above, please contact our Data Protection Officer at TocquevilleCCPA@tocqueville.com and Telephone No. (877) 776-2766.

You may only make a verifiable consumer request for access twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to verify, to a reasonably high degree of certainty, that you are the person about whom we collected personal information. This may include requesting that you provide us with at least two or more pieces of personal information to match against personal information about you that we may or may not maintain and which we have determined to be reliable for the purpose of verification.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. We will endeavor to respond to a verifiable customer request within 45 of its receipt. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt.

Authorized Agent

Only you, or a person you have designated in writing as your authorized agent, or whom is registered with the California Secretary of State to act on your behalf, or whom you have provided power of attorney pursuant to California Probate Code sections 4000 to 4465, ("Authorized Agent"), may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

If you wish to have an Authorized Agent make a verifiable consumer requests on your behalf, they will need to provide us with sufficient written proof that you have designated them as your Authorized Agent and we will still require you to provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information.

Non-Discrimination

You have the right not to receive discriminatory treatment for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Additional Information

For any questions about this Notice, please contact our Data Protection Officer at TocquevilleCCPA@tocqueville.com and Telephone No. (877) 776-2766.

ⁱ *Our affiliates include companies with a "Tocqueville" name, such as Tocqueville Asset Management L.P. and Tocqueville Securities L.P.*

Effective January 1, 2020