

Nuance Investments, LLC

Privacy Notice

Nuance Investments, LLC (“Nuance,” “we,” “us”) is committed to ensuring your financial privacy.

When you become a client of Nuance, we generally require that you provide us with certain personal information so that we may open and manage your account. We may share your information with non-affiliated third parties to perform transaction processing or other services. We reserve the right to change our privacy practices at any time and where applicable laws require us, we will provide appropriate notice, and take any necessary action, should we make any material changes to our practices.

For more detailed information about our privacy practices relating to when we collect and process information for administering financial services or products, please read our Privacy Policy [here](#). We encourage you to review this page periodically for the latest information on our privacy practices.

For more detailed information about our privacy practices relating to your personal information that is not related to our administering financial services or products, please see below (Privacy Notice – General Practices).

Privacy Notice -- General Practices

Effective Date: 1/1/2023

This portion of the Privacy Notice (“Notice”) applies to information we collect from individuals (“consumers” or “you”) on our website www.nuanceinvestments.com and related webpages (“Website”), in emails or other electronic messages or interactions between you and Nuance, and from information you provide to us when you contact us, like or post any comment on our social media sites, or subscribe to receive our marketing materials including our fact sheet and perspectives. We adopt this Notice to comply with, for example, the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights and Enforcement Act of 2020, (“CCPA”) and any terms defined in the CCPA have the same meaning when used in this Notice.

Please read this Notice carefully to understand our practices regarding your information and how we will treat it. If you do not agree to the terms of this Notice, you should not use our Website. We reserve the right to update or modify this Policy from time to time. Where applicable data protection laws require us, we will provide appropriate notice, and take any necessary action,

should we make any material changes to our practices. We encourage you to review this page periodically for the latest information on our privacy practices.

Children Under the Age of 16. Our Website is not intended for use by children under the age of 16. We do not knowingly collect or disclose personal information from children under 16. If you are under the age of 16, do not use or provide any information on our Website. If we learn we have collected or received personal information from a child under the age of 16 without proper consent, we will delete that information.

Personal Information We Collect

We collect information from you in a variety of ways including, for example, when you visit our Website, send us an email, or subscribe to receive our monthly fact sheet and quarterly perspectives. This information may include personal information that can be used to identify you. Personal information, as used in this Notice, includes sensitive personal information. Personal Information does not include publicly available information from government records or either deidentified or aggregated consumer information.

In particular, our practices regarding your personal information within the past twelve months are as follows:

We collect ***Identifiers and Personal Information (e.g., categories of personal information listed in the Customer Records Statute Section 1798.80(e))***, such as, for example, your name and email address, and perhaps your postal address, phone number, and your Nuance account name and number (if you have one), when you provide this information directly to us so we can provide you with the information you have requested. We will also input this information in our customer relationship management system to track your interests and to enable us to follow-up with you, including sending you our marketing materials if you opt-in to receive them. We keep this information as long as you continue to subscribe to receive our materials. If you do not opt-in to receive our marketing information or unsubscribe from receiving marketing information, which you can do at any time, we will keep your information for a maximum period of one year unless the information is publicly available or there is another business purpose requiring us to maintain your information, such as, for example, to maintain an account with us. We do not disclose, share or sell this information to third parties.

We collect ***Internet or other similar activity***, such as, for example, your browsing history, search history, and information regarding your interaction with our Website from our Website, our service providers and operating systems and platforms. We collect this information to improve the content on our Website, to analyze and track the performance and use of our Website, to capture your web activity in our customer relationship management system, and to perform research for our marketing purposes. We will keep this information so long as you have a continuing business relationship with us or for a period of two years. We do not disclose, share, or sell this information to third parties.

We may also collect ***Internet or other similar activity*** to maintain our Website, including debugging, and to secure our Website, including detecting, preventing, or prosecuting a security incident or other illegal activity. We keep this information for a period of up to six years. We may disclose this information to our service providers, to government entities, and our operating systems and platforms.

We collect ***Geolocation Data***, such as, for example, your location based on your IP Address, from our Website. We also collect nonpersonalized geolocation information based on your truncated IP address from our analytics service provider. We do not collect GPS location information. We collect this information to understand our geographic reach for our marketing campaigns. We do not disclose, share, or sell this information to third parties.

We also collect ***Internet or other similar activity***, such as, for example, information regarding your interaction with our Website, your browser information, your operating system, your referring site details, your network location, and truncated IP address from Google Analytics, our data analytics service provider. We collect this information to evaluate our marketing effectiveness, including determining how our Website is performing, the number of Website visitors, the Website interactions and duration, and details regarding how you came to our Website. We keep this information for two years. We do not disclose, share, or sell this information to third parties.

Additionally, we also receive ***Internet or other similar activity*** when you visit our social media pages. For example, we use LinkedIn analytics in connection with the operation of our LinkedIn page in order to obtain anonymized statistical data about visitors to our LinkedIn page. For this purpose, LinkedIn places a cookie on your device when you visit our LinkedIn page at www.linkedin.com/company/nuance-investments-llc/. Each cookie contains a unique identifier code that remains active for a period described in the LinkedIn cookie table <https://www.linkedin.com/legal/cookie-table> unless it is deleted before the end of this period. LinkedIn receives, records, and processes the information stored in the cookie, including demographic information from any LinkedIn profile you may have, to provide us with anonymized metrics to help us measure the effectiveness of our LinkedIn page for marketing purposes. For more information on the privacy practices of LinkedIn, please visit the LinkedIn Privacy Policy at [Privacy \(linkedin.com\)](http://Privacy.linkedin.com).

We may also use or disclose your information for one or more of the following purposes:

- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- To help maintain the safety, security, and integrity of our Website, products and services, and databases and other technology assets and to detect, prevent, or mitigate fraud or security or technical issues;

- To protect against imminent harm to the rights, property or safety of our company, our customers, or the public as required or permitted by law;
- In corporate transactions, we may share your information with a potential buyer or other successor to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as party of bankruptcy, liquidation, or similar proceeding, in which personal information held by us about our consumers is among the assets transferred; and
- As otherwise described to you when collecting your personal information.

We do not use or disclose sensitive personal information for any purpose.

How you can control cookies. Most browsers are initially set up to accept cookies. However, if you prefer not to store cookies on your device, you can set your browser to notify you when you receive a cookie, set your browser to refuse cookies by activating the appropriate setting on your browser, delete cookies after visiting our Website, or browse our Website using your browser's anonymous usage setting. However, if you do not accept cookies, this may prevent our Website or services from working properly. For instructions, check your browser's help file or technical instructions.

Changes to the Privacy Statement

We reserve the right to change this Statement. If we decide to make changes, we will post the updated statement on our Website so you are always aware of what information we collect, how we use it, and the circumstances, if any, we disclose it. The date this Statement was last revised is identified at the top of the page. You are responsible for ensuring that we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and the Statement to check for any changes. Your continued use of our Website following the posting of changes constitutes acceptance of such changes. Where required by applicable data protection laws, we will also seek your consent to any material changes that affect how we use your information.

Help

If you need help with unsubscribing, or have questions regarding this Statement, the ways in which we collect, share, and use your information as described in this Statement, your choices and rights regarding such use, or wish to exercise your rights under California law, please contact us at client.services@nuanceinvestments.com.

For Residents of California

Your Rights

This section describes your rights regarding your personal information under the CCPA and how to exercise those rights.

Accessing Your Information and Data Portability Rights

You have the right to request that we disclose certain information to you about our collection and use of your personal information since January 1, 2022, including beyond the 12-month period preceding your request, unless doing so would involve disproportionate effort or is not possible. 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, selling, or sharing that personal information.
- The categories of third parties with whom we disclose that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold, shared, or disclosed your personal information for a business purpose,
 - o Sales, identifying the personal information categories that each category of recipient purchased; and
 - o Disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

Requesting Deletion of Information

You have the right to request that we 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 and contractors to delete, your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which the personal information was collected, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.

- Help to ensure security and integrity to the extent the use of your personal information is reasonably necessary and proportionate for those purposes.
- Debug products to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et seq.).
- Engage in public or peer-reviewed scientific, historical, or statistical research that conforms or adheres to all other applicable ethics and privacy laws, when the business's deletion of the information is likely to render impossible or seriously impair the ability to complete such research, if you previously provided informed consent.
- Enable solely internal uses that are reasonably aligned with consumer expectations based on the relationship with us and compatible with the context in which you have provided the information.
- Comply with a legal obligation.

Right to Correct Information

You have the right to request that we correct any inaccurate personal information that we have about you. Once we receive and confirm your verifiable consumer request, we will use commercially reasonable efforts to correct any inaccurate information and we will instruct our service providers or any contractors to correct such information. We will also inform you whether or not we have complied with your request, including any basis for denial of the request.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, correction, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Emailing us at [client.services@nuanceinvestments.com]
- Calling us at 816-743-7080
- Mailing us at:

Nuance Investments, LLC
4900 Main Street
Suite 220
Kansas City, MO 64112
Attn: Compliance Department

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, 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 submit a request on behalf of another person, we may require proof of authorization and verification of identity directly from the person for whom you are submitting a request.

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

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, which may include your name and email address;
- 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. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing

We will confirm receipt of your request within ten (10) business days. If you do not receive confirmation within the 10-day timeframe, please contact [insert method – email address/phone number].

We endeavor to respond to a verifiable consumer within 45 days of its receipt. If we require more time (up to 45 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, which may include either a screen shot of the information or a pdf.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Personal Information Sales/Sharing Opt-Out and Opt-In Rights

Under the California Consumer Privacy Act (“CCPA”), if you are 16 years of age or older, you have the right to direct us not to sell or share your personal information at any time (the “right to opt-out”). We do not sell or share your information with third parties.

Non-Discrimination

We will not discriminate against you for exercising any of your rights under the CCPA. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you with 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.

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