

BofA INSIGHT®

UNITED STATES PRIVACY NOTICE

ABOUT US

“Bank of America” and “BofA Securities” are the marketing names used by the Global Banking and Global Markets divisions of Bank of America Corporation and references to “us” means Bank of America Corporation and its affiliates. Lending, other commercial banking activities, and trading in certain financial instruments are performed globally by banking affiliates of Bank of America Corporation, including Bank of America, N.A., Member FDIC. Trading in securities and financial instruments, and strategic advisory, and other investment banking activities, are performed globally by investment banking affiliates of Bank of America Corporation (“Investment Banking Affiliates”), including, in the United States, BofA Securities, Inc. and Merrill Lynch Professional Clearing Corp., both of which are registered broker-dealers and Members of [SIPC](#), and, in other jurisdictions, by locally registered entities. BofA Securities, Inc. and Merrill Lynch Professional Clearing Corp. are registered as futures commission merchants with the CFTC and are members of the NFA. “Bank of America” and “BofA Securities” and each of the Investment Banking Affiliates and each affiliate of Bank of America Corporation are each and together referred to herein as a “Provider.”

Investment products offered by Investment Banking Affiliates: Are Not FDIC Insured • May Lose Value. • Are Not Bank Guaranteed.

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INSIGHT APP

The Insight Application (“Insight App” or “App”) provides certain information and functionality to our non-consumer professional clients via a mobile device. Through the Insight App, authenticated users may be able to perform a number of functions, including but not limited to view upcoming meetings, search for contacts, create touchpoints, make calls and send emails, view research, view commentary from trading floors and video-and audio-casts based on areas of interest, and view in-market deals and upcoming events.

This Insight Application United States Privacy Notice (“Notice”) outlines our practices regarding the collection, use, and disclosure of individually identifiable information about users of this Insight App. For purposes of this Notice, “you” and “your” means any individual who uses the Insight App to access Provider’s services (“Services”). **This Notice should be read in conjunction with other relevant privacy or data protection notices provided by Provider in relation to the Services in other jurisdictions. See [Global Banking and Markets Privacy and Security Notices](#).**

The content and functionality provided through the Insight App is sourced from or integrated with the various “Platforms”, including, but not limited to, Compass, Beacon, Digital Safe, TPW, RL, Centera, Brightcove, CellTrust, GEMS, Mercury, Symphony, Storm Equity, Storm Loans, Storm Bond, DCM STORM, Cesium, RDR, PARS, GDH, STORM Equity, Symphony, STORM Bond, STORM Loan, STORM DCM Pricer that provide the Services described in the Privacy Notice here. However, in providing the Insight App, additional information is collected, used and shared as described below.

INFORMATION COLLECTED THROUGH THE INSIGHT APP

In connection with your use of the Insight App, we will require an identifier – a credential (username and password) that authenticates you to the App (and any corresponding Platforms and Services) and allows you to access this functionality securely.

In addition, we automatically collect internet and network activity information:

- Device information such as IP address, device manufacturer and model, and App version;
- App usage data, such as content viewed by the user on the App and other platforms, time of viewing, duration of viewing, and any messages or annotations made;
- If enabled through your device, diagnostic information, for example when the App stops functioning or operates improperly; and
- Settings or preference choices you make for the App.

The activity logs and data we collect via the App may be appended to your overall account information, collected, used and disclosed pursuant to the Privacy Notice.

HOW WE USE THE INFORMATION COLLECTED THROUGH THE INSIGHT APP

We use the credential that you supply via the Insight App to authenticate you to the Platforms and Services that the App makes accessible to you on your mobile device. By authenticating you, and using your settings and preferences, we are able to tailor and deliver appropriate content to you, including information about deals and transactions relevant to you, your contacts, and your events. The App serves as an online portal to other Provider Services or content which you are authorized to access or receive, as an authorized representative of a non-consumer professional client.

We also use device information, app usage data, diagnostic data and settings or preferences that we collect when you use the App in order to ensure the functionality of the App, to enhance, improve and modify the App, and generally to provide and to generally improve the Services.

HOW WE SHARE THE INFORMATION COLLECTED THROUGH THE INSIGHT APP

We may share information collected through the Insight App, including identifiers and internet and network activity information, with the following parties for a legitimate business purpose:

- to affiliates and subsidiaries of Provider for the purposes described in this Privacy Notice (“affiliates”);
- to our third party service providers who provide services such as application hosting, data analysis, information technology and related infrastructure provisioning, technical support and related services;
- other persons as agreed with Provider’s client or as required or expressly permitted by applicable law.

We may also use and disclose the information we collect through the Insight App as we believe to be necessary or appropriate:

(a) to comply with applicable law including treaties or agreements with or between foreign or domestic governments (including in relation to tax reporting laws), which may include laws outside the country you are located in, to respond to requests from public and government authorities, which may include authorities outside your country, to cooperate with law enforcement, governmental, regulatory, securities exchange or other similar agencies or authorities including tax authorities to which we or our affiliates are subject or submit, in each case of any country worldwide, or for other legal reasons, who may transfer personal data to equivalent agencies or authorities in other countries;

(b) to central banks, regulators, trade data repositories, or approved reporting mechanisms which may be outside your country;

(c) to courts, litigation counterparties and others, pursuant to subpoena or other court order or process or otherwise as reasonably necessary, including in the context of litigation, arbitration and similar proceedings to enforce our terms and conditions, and as reasonably necessary to prepare for or conduct any litigation, arbitration and/or similar proceedings; and

(d) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.

In addition, we may use, disclose or transfer personal data collected through the Insight App to a third party (i) in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings) and/or (ii) to third parties, as requested by clients or their representatives.

Personal data collected under this policy is not shared with third parties for business purposes independent of delivering a service to us, as described above.

SECURITY

We maintain appropriate technical and organizational measures designed to protect against unauthorized or unlawful processing of individually identifiable personal information and/or against accidental loss, alteration, disclosure or accidental or unlawful destruction or damage to individually identifiable personal information.

INTERNATIONAL DATA PROTECTION

Given the global nature of Provider's Services, we may transfer your individually identifiable information to countries located outside your home jurisdiction. These jurisdictions may not provide an equivalent level of data protection to the laws in your home jurisdiction. With regard to such transfers, we have put in place adequate measures, such as standard contractual clauses adopted by the European Commission to help protect your information.

You may have other privacy rights or be entitled to additional disclosures depending on your country of residence. Please visit [this link](#) to view other disclosures based on your jurisdiction of residence.

UPDATES TO THE INSIGHT APP PRIVACY NOTICE

We may change this Privacy Notice from time to time. The "LAST UPDATED" legend at the top of the Privacy Notice indicates when the Privacy Notice, was last revised. Any changes will become effective as updated on the Insight App. Use of the Services through the Insight App, following these changes (or your continued provision of personal data to us) signifies acceptance of the revised Privacy Notice.

CONTACTING US

The Provider entity that provides the Services, as per the "Insight App Terms and Conditions" as provided in the Insight App is the entity responsible for collection, use and disclosure of your Personal Data under this Privacy Notice.

If you do not know which Provider entity is responsible for those Services or you have any questions about this Privacy Notice, please contact your usual Provider contact.

If you need to get in touch with us about anything concerning the Insight App, you can use the "Need Help? Click here for support" option within the Insight App.

To help us to manage your query, please include your full name and the name of the Provider entity you understand is processing your personal data and/or any reference number that was made available by a Provider entity to you.