

Privacy Notice – Canadian Residents

If you have any questions pertaining to this notice or if you wish to exercise your rights under applicable law, you can contact us at:

Phone: 1.800.647.7378

Email: privacyaccessrequests@raymondjames.com

Website: raymondjames.com

This Privacy notice for Canadian residents supplements, and is to be read in conjunction with, the information contained in the Privacy Notice(s) of Raymond James (“we,” “us,” “our”) and applies solely to individuals who interact or have a relationship with Raymond James and who reside in Canada (“consumers” or “you”). We have adopted this Notice to comply with the Personal Information Protection and Electronic Documents Act (“PIPEDA”) and applicable provincial private sector privacy laws.

What is Personal Information?

Under applicable law, “Personal Information” is information about an identifiable individual, including information that, alone or together with other available information, may be used to identify an individual. Personal Information includes, but is not limited to, the following: (a) identifiers, (b) select information in consumer records, (c) legally protected characteristics, (d) commercial purchasing information, (e) biometric information, (f) internet or network activity, (g) geolocation, (h) information typically detected by the senses, (i) employment information, (j) education information, (k) inferences from the above categories used to profile, or (l) sensitive Personal Information.

Information Raymond James collects about you

We may collect, use, store, and transfer different kinds of Personal Information about you depending on our relationship or interaction with you which we have grouped together as follows:

- Identification and contact information, such as name, marital status, date of birth, gender, and identification numbers (e.g., a driver’s license number or passport number)

- Financial and transactional information, such as investment knowledge and objectives, risk tolerance, income, financial assets, property ownership, employment, salary, and records of products or services purchased, or considered, with Raymond James
- Technical data, such as your IP address, cookie data, login credentials, and information regarding your browsing of our websites
- Information that we collect through our communications with you, such as records of calls and in-person meetings with you

We do not process personal information beyond what is reasonably necessary to provide our products and services and the purposes described above. We may rely on service providers to assist us with these efforts.

How Raymond James collects information about you

We collect your personal information as follows:

- Directly from you, such as from documents that you provide to us related to the services for which you've engaged us;
- Indirectly from you, such as through your use of our websites (for more information, please see our [Internet Privacy Statement](#)); and
- From third parties that interact with us in connection with services we perform or products we provide, such as outside companies we engage to assist us in providing you with our products and services.

Obtaining Your Consent

At the beginning of your relationship with Raymond James when you first provide your personal information to us, we ask for your consent to collect, use and share (collectively “process”) your Personal Information for all of the purposes described in this Notice. The scope of the consent that we are requesting covers only what Raymond James requires in order for us to be able to provide you with the products and services you have requested. Without your consent, we are unable to provide you with the products and services you have requested.

Should we need to use or share your personal information for a different purpose than is covered in the standard consent that you have provided, we will request an additional privacy consent from you prior to taking any actions.

Throughout your relationship with us, depending on the situation and the sensitivity of the information or the method of our interaction, we may obtain your privacy consent in different ways. We may obtain express consent verbally, online or in writing. We may request your implied consent through your use of a product, or consider you to have provided implied consent when you

approach us to obtain information, inquire about or apply for products or services from us. Whatever the method, our goal is to ensure that you understand the purpose of the consent that you are providing.

In addition, you will be presented with an option of providing a separate consent to receive marketing from Raymond James Advisor and the professionals you work with at Raymond James at the beginning of your relationship with us.

A key component of the services offered by Raymond James is the market research and product and service information you will receive as a client of Raymond James that will help meet your total wealth management needs. You have the choice of opting in to agree to your advisory team and the professionals that you work with at Raymond James using your personal information to let you know about our products, services, and other opportunities by checking the consent tick box.

This consent is optional and may be changed or withdrawn by you at any time. You can update your marketing communication preferences at any time by contacting your Advisor or the branch or office you deal with.

How does Raymond James use your information?

We use your information for the following purposes:

- Establish and maintain our relationship with you: We use your personal information to create, maintain, customize, and secure your accounts and provide you with the products and services that you have requested. This includes performing identity verification and processing transactions on your behalf. If you request certain credit products (such as a margin account), it will also include sharing personal information with lenders or credit reporting agencies to obtain credit checks and determine your creditworthiness.
- Fulfill our regulatory and legal obligations: For instance, to comply with applicable anti-money laundering and anti-terrorism laws, we use your personal information to detect and prevent fraud. We also may use your personal information to respond to court orders and legal investigations, or to otherwise establish, exercise or defend our legal rights.
- Market our products and services to you: As noted above, we may provide you with market research and product and service information to help you better understand our product and service offerings. Additionally, we may also use the technical information you provide when you interact with our websites to support, personalize, and develop our website and online products and services.
- As otherwise required or permitted by law.

Retention Period

We will not retain Personal Information longer than necessary to fulfill the purposes for which it is processed, which include ensuring the security of our processing, complying with legal and regulatory obligations (e.g. audit, accounting and statutory retention terms), handling disputes, and for the establishment, exercise or defense of legal claims in the countries where we do business.

Sharing of Personal Information

When necessary for business purposes Raymond James shares your Personal Information with third parties and service providers that we have engaged to perform services on our behalf. When Raymond James shares your Personal Information in this way, we enter into contracts and implement other technical and organizational measures designed to ensure that your Personal Information continues to be protected by third-party recipients.

The categories of third parties we may share your Personal Information with include: our affiliates and subsidiaries, service providers performing necessary business functions, financial advisors registered with Raymond James, financial institutions with networking agreements with Raymond James, introducing broker-dealer or registered investment advisers, financial product and service companies.

Information may be stored and processed in any country where we have affiliates or service providers. Our service providers and other third parties, including our affiliates with whom we share information under this policy, may perform activities outside of Canada. As a result, your information may be used, stored or accessed in other countries and be subject to the laws of those countries. By using our products or services, you consent to the transfer of information to countries outside of Canada and outside of Quebec, which may provide different data protection rules, including to the United States. In all cases, we take steps designed to ensure the continued protection of Personal Information in such other jurisdictions.

We may also disclose personal information to law enforcement, self-regulatory organizations (e.g., FINRA), and regulators as required or permitted by law, in some cases to government and regulatory authorities in jurisdictions outside Canada. For example, information may be required to be shared in response to validate demands or requests from government authorities, courts, regulators and law enforcement officials in those countries as required by applicable law.

Our products and services are not directed at, marketed to, nor intended for, children under 18 years of age. We do not knowingly collect any Personal Information directly from children under the age of 18. If you have reason to believe that someone under the age of 18 has provided Personal Information to Raymond James, please contact us and we will take appropriate action.

Your Rights

Under applicable law, you have specific rights regarding your Personal Information held by private companies. The below section describes your rights and how to exercise them.

Access

You have the right to request access to any Personal Information we hold about you. In order to exercise this right, Raymond James must first verify your identity to ensure it is a legitimate request, and then disclose to you, in accordance with your request:

- The Personal Information we hold about you
- The types of sources used to collect Personal Information about you
- The types of third parties with which we have shared any of your Personal Information (if applicable).
- The purpose(s) for using and disclosing your Personal Information.

Withdrawal of Consent

You have the right to withdraw consent at any time, subject to legal and contractual restrictions. However, if you choose not to provide requested personal information or consents, or withdraw your consent, we may not be able to open or continue to service your account or provide you with all of the products and services you are requesting. For example, we cannot open or maintain an investment account without certain personal information as we would be in breach of our legal and regulatory obligations.

Accuracy

You have the right to ask us to correct Personal Information that we have collected about you. In order to exercise this right, Raymond James must first verify your identity to ensure it is a legitimate request.

Deletion

You have the right to request that we delete the Personal Information we have collected from and about you, subject to legal or contractual restrictions. In order to exercise this right, Raymond James must first verify your identity to ensure it is a legitimate request, we will then delete or de-identify the relevant information unless an exemption applies.

To exercise the access, withdrawal of consent, accuracy, or deletion rights described above please submit a verifiable consumer request via the phone number or email address below in the “Contact Information” section of this notice.

Changes to Our Privacy Notice

Raymond James reserves the right to update or change the information contained in this privacy notice at any time. In the event of a substantive change to our policies, we will notify you and may request your explicit consent as necessary. We suggest you visit our website (raymondjames.com) periodically to learn of any changes to our Notice.

Contact Information

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Email: privacyaccessrequests@raymondjames.com

When you contact us, please provide the following:

- Type of request (access, correction, data portability, or deletion)
- Your relationship to Raymond James (client, prospect)
- Your state of residency
- Preferred method of contact (email or phone)
- Whether you are submitting the request for yourself or on behalf of someone else

This includes but is not limited to: Raymond James Financial, Inc., Raymond James & Associates, Inc., Raymond James Financial Services, Inc., Raymond James Financial Services Advisors, Inc., Raymond James Insurance Group, Inc., The Producers Choice, LLC, Raymond James Bank, N.A., Raymond James Trust, N.A., Carillon Tower Advisers, Inc., Carillon Family of Funds, Carillon Fund Distributors, Inc., Carillon Fund Services, Inc., Eagle Asset Management, Inc., and Scout Investments, Inc., and SumRidge Partners, LLC.

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