



ALLIANCEBERNSTEIN™

501 Commerce Street
Nashville, TN 37203
www.alliancebernstein.com
T (212) 909 1000

Privacy Notice

This Privacy Notice describes how AllianceBernstein and its affiliates (collectively referred to as “AllianceBernstein”, “we”, “our”, and similar pronouns) collect, use, and share our clients’ nonpublic personal information. Nonpublic personal information is personally identifiable financial information about our clients who are natural persons. To provide financial products and services to our clients, we collect nonpublic personal information from a variety of sources, including: (1) information we receive from clients, such as through applications or other forms, which can include a client’s name, address, phone number, social security number, assets, income and other household information, (2) information about client transactions with us, our affiliates and non-affiliated third parties, which can include account balances, transactions history and other information related to financial background and accreditation of investors, and (3) information from visitors to our websites provided through online forms, site visitorship data and online information-collecting devices known as “cookies.”

We may disclose all of the nonpublic personal information that we collect about our current and former clients, as described above, to non-affiliated third parties to manage our business and as otherwise required or permitted by law, including those that perform transaction processing or servicing functions, marketing services providers that provide marketing services on our behalf pursuant to a joint marketing agreement, and professional services firms that provide knowledge-based services such as accountants, consultants, lawyers and auditors to help manage client accounts. We may also disclose nonpublic personal information where necessary for us to comply with legal or regulatory obligations, such as our obligations regarding know-your-client, anti-money laundering, tax purposes, fraud, terrorist financing and sanctions. Such information may also be disclosed during the diligence for and completion of a sale of assets, restructuring of our business, or a merger, acquisition, or other corporate transaction. We require all the third-party providers to adhere to our privacy policy or a functional equivalent.

We may also disclose the nonpublic personal information that we collect about current and former clients, as described above, to our affiliated investment, brokerage, service and insurance companies for the purpose of marketing their products or services to clients under circumstances that are permitted by law, such as if our affiliate has its own relationship with you.

We will also use nonpublic personal information about our clients for our own internal analysis, analytics, research and development, and to improve and add to our client offerings.

We have policies and procedures designed to safeguard the confidentiality and security of nonpublic personal information about our clients that include restricting access to nonpublic personal information to personnel that have been screened and undergone security and privacy training; to personnel who need it to perform their work functions such as our operations, customer service, account management, finance, quality, vendor management and compliance teams as required to provide services, communicate with you and fulfill our legal obligations.

We employ physical, electronic and procedural safeguards designed to secure and protect client nonpublic personal information. Additionally, our disposal of nonpublic personal information is done in a secure manner. Although we have put these reasonable safeguards in place to help

protect your nonpublic personal information from unauthorized access, use, modification and disclosure, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion.

If you are in the European Economic Area (“EEA”) or Switzerland, we will comply with applicable legal requirements providing adequate protection for the transfer of personal information to recipients in countries outside of the EEA and Switzerland.

The California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (“CCPA”) provides California residents with additional rights with respect to their personal information. The CCPA does not apply to natural person investors; however, if you are an institutional investor or other party that may share personal information with us, you should provide the individuals whose personal information you may share (e.g., employees or trust beneficiaries) with a copy of this notice. If you are a California resident, please visit alliancebernstein.com/ccpa to learn more about your rights under the CCPA.

Please visit alliancebernstein.com/privacy for more information about our Privacy Policy.