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# Wells Fargo International Privacy Notice

All countries except United States, Australia, Canada, New Zealand, South Korea, and European Union Countries.

**Effective:** 12 April 2021

The Wells Fargo entity with which you and/or your organization have a relationship or otherwise share Personal Data ("Wells Fargo") provides this privacy notice ("Notice") to describe our practices as a data controller regarding the collection, storage, use, disclosure, and other processing of Personal Data as defined below. If you or your organization has a relationship or otherwise share Personal Data with a Wells Fargo entity in the U.S., a different privacy statement at <https://www.wellsfargo.com/privacy-security> regarding that Wells Fargo entity's practices will govern those information collection and processing activities.

## 1. Types of Personal Data Collected

Outside the United States, we primarily have relationships and accounts only with corporations and other legal entities. However, we may collect information about individual representatives ("Individuals") of our customer organizations ("Customers") such as the Individual's:

- **Work contact details:** name, work address, phone number, mobile phone number, email address, and online contact details, including but not limited to unique identification and password for access to our website, mobile applications, and/or social media features.
- **Position description:** employer, title, position held, duties, and length of employment.
- **Authentication data:** passport, driver's license, other governmental identification information, home address and telephone number, documents that verify address, date of birth, country of domicile, documents that verify employment, and signature authorization.
- **Financial data:** salary and other income, sources of wealth, assets, financial relationships, and financial transactions.
- **Background check data:** background check information including credit and criminal checks and screening, to the extent required or permitted by local law.
- **Electronic and voice communications data:** business communications content and data, including IP address and session identification, with Wells Fargo through all applicable communication channels, including email, text, instant message or chat, transcriptions and/or telephone communications, voice recordings, video recordings, and presentations hosted by Wells Fargo.

Collectively, the above categories of data constitute "**Personal Data.**" We may collect Personal Data directly from the Individual, Customers, including through interactions with the Bank and use of Bank systems, private lists, and publicly available sources. **Failure to provide this information may result in Wells Fargo being unable to provide or continue to provide the requested services to the Customer.**

## 2. Purposes of Collection and Use

The purposes of collection and use of Personal Data are:

- **To provide the services requested by our Customers**, perform obligations under our agreements, and carry out related business functions, including performing data and transaction processing, conducting credit checks, handling Customer inquiries, including communicating, presenting, and meeting with a Customer, and managing the Customer relationship, we collect and use work contact details, position description, authentication data, financial data, background check data, and electronic and voice communications data.
- **To comply with legal obligations and regulations** applicable to Wells Fargo and its Affiliated Entities (defined below) in the United States and/or any relevant jurisdictions, including but not limited to “know your customer” obligations based on applicable anti-money laundering and anti-terrorism requirements, economic and trade sanctions, customer due diligence, fraud prevention and information security, suspicious activity reporting, foreign exchange and international trade, tax reporting and other applicable laws, regulations, ordinances, and obligations, we collect and use work contact details, position description, authentication data, financial data, background check data, and electronic and voice communications data.
- **To confirm a person’s authority as a representative or agent of a Customer** with which Wells Fargo or its Affiliated Entities have entered or intend to enter into various arrangements, including but not limited to deposit contracts, loan contracts, contracts for foreign exchange transactions, contracts for derivative transactions, and letters of credit, we collect and use work contact details, position description, background check data, and authentication data.
- **To conduct recordkeeping** and otherwise manage the business, subject to and in accordance with applicable law, we collect and use work contact details, position description, authentication data, financial data, background check data, and electronic and voice communications data.

## 3. Disclosure of Personal Data

Wells Fargo may disclose Personal Data as follows (in each case to the extent necessary and on a need-to-know basis).

- **Affiliated Entities.** Wells Fargo has affiliated entities operating in the United States and around the world, including the group parent in the United States, Wells Fargo & Company, and Wells Fargo Bank, N.A. ("**Affiliated Entities**") (collectively, Wells Fargo and our Affiliated Entities are the "**Wells Fargo Group**"). Wells Fargo may disclose Personal Data to our Affiliated Entities on a worldwide basis, and such affiliates may use the data, for the purposes described in Section 2.
- **Beneficiaries, counterparties, and other parties related to a transaction.** The Wells Fargo Group may disclose Personal Data to beneficiaries, counterparties, or other parties related to a transaction on a worldwide basis to provide the services requested by our customers and to comply with legal obligations and regulations.
- **Service providers.** The Wells Fargo Group may disclose Personal Data to information technology providers or other service providers around the world that act under our instructions regarding the processing of such data ("**Data Processors**"). Data Processors will be subject to contractual obligations to implement appropriate administrative, technical, physical, and organizational security measures to safeguard Personal Data, and to process Personal Data only as instructed. The Wells Fargo Group may also disclose Personal Data to independent external auditors or other service providers around the world that may not be acting as a Data Processor. Such service providers will be subject to any necessary contractual obligations regarding the protection and processing of such Personal Data.
- **Legal requirements.** Subject to applicable law, the Wells Fargo Group may disclose Personal Data if required or permitted by applicable law or regulation, including laws and regulations of the United States and other countries, or in the good faith belief that such action is necessary to: (a) comply with a legal obligation or in response to a request from

law enforcement or other public authorities wherever the Wells Fargo Group may do business; (b) protect and defend the rights or property of any Wells Fargo Group entity; (c) act in urgent circumstances to protect the personal safety of Individuals, Customers, and contingent resources/employees of any Wells Fargo Group entity or others; or (d) protect against any legal liability. In addition, the Wells Fargo Group may share your Personal Data with U.S. regulators and with other self-regulatory bodies to which we are subject, wherever the Wells Fargo Group may do business.

- **Business transfers, combinations and related activities.** As we develop our business, the Wells Fargo Group might sell, buy, acquire, obtain, exchange, restructure or reorganize businesses or assets. In the event of any actual or proposed sale, merger, reorganization, transaction, restructuring, dissolution or any similar event involving our business or assets, Personal Data may be shared with the relevant entity or may be part of the transferred assets and will be subject to any necessary contractual obligations to ensure the protection of Personal Data.

The recipients of Personal Data identified in this Section 3 may be located in the United States and other jurisdictions that may not provide the same level of data protection as your home country. As needed, we have taken steps to establish appropriate data transfer agreements (including agreements based on the EU Model Contractual Clauses with respect to Personal Data from Europe) or otherwise address cross-border data transfer restrictions. These measures enable us to transfer and use Personal Data in a secure manner anywhere in the world where we have an establishment, or where we have contracted third parties to provide us with services.

## 4. Consents

To the extent that consent is required by applicable law and our collection, use, disclosure, or other processing of Personal Data is not otherwise permitted by applicable law, you expressly consent to the collection, use, disclosure (including cross-border transfer), and other processing of Personal Data as described in this Notice by providing Personal Data to the Wells Fargo Group or authorizing our Customer to provide such information to us, where permitted by applicable law. You expressly waive the bank secrecy or confidentiality laws and obligations, if any, of the country or countries where you and the accounts are located to the extent permitted by applicable law.

You may revoke consent at any time by notifying us at the address provided in Section 8 of this Notice. Prior uses and disclosures will not be affected (unless required by applicable law), and we may otherwise continue to process Personal Data as permitted or required by law. Revocation of consent may result in our inability to provide or continue to provide the requested services to the Customer.

## 5. Information Management, Security Control Measures, and Retention Periods

The Personal Data will be safely stored in the databases of Wells Fargo. Appropriate measures are taken so that Personal Data can be kept accurate, and up-to-date, which will be in accordance with the applicable security requirements. In an effort to prevent the loss, misuse, unauthorized access, disclosure, alteration or destruction of Personal Data, Wells Fargo will take appropriate legal, technical, physical and organizational security measures to protect Personal Data. We will keep Personal Data no longer than necessary to: i) fulfill the purposes outlined in this Notice; ii) comply with legal or regulatory obligations to which Wells Fargo is subject; or iii) perform a contract duly established with you or in order to take steps at your request prior to entering a contract. We have implemented appropriate records retention policies to retain Personal Data only to the extent permitted by applicable laws. We may need to hold Personal Data beyond retention periods in response to a regulatory audit, investigation, or other legal matter. These requirements also apply to our third party service providers. Where required by law, Wells Fargo will anonymize data for additional processing.

While registering with our website, mobile applications, or social media features (each, a "Site"), we may provide you with a unique identification and password for accessing our products and services. We encourage you to choose your password

wisely such that no intruder or third party can obtain any unauthorized access to the Site. We also encourage you to keep your password confidential and not have any written or other record of the password that can be accessible by an intruder or third party.

## 6. Access and Correction, Choice for Marketing Materials, and Other Legal Rights

- **Access and Correction.** Individuals have the right to access and correct any Personal Data held about them. Requests to access or correct any Personal Data held about an Individual must be submitted by the Individual in writing to the address listed in the Customer Inquiries section below. After we have verified the Individual's identity, we will endeavor to provide the information and take the other actions requested as specified by local law, and, where permitted by law, we may charge an appropriate fee to cover the costs of responding to the request. In addition, an overview of all entities involved in the processing of Personal Data, including data processors and the countries where being processed, are available upon request.
- **Choice for Marketing Materials.** If you do not want to receive marketing and sales materials from Wells Fargo by direct mail, telephone or email, please follow the “unsubscribe” instructions provided in those communications or submit a written request to the address listed in the Customer Inquiries section below. We will comply with your request within a reasonable period of time after receiving it or within the time period required by local law.
- **Other Legal Rights.** You may have other rights under the laws applicable to our collection of your Personal Data, such as requesting information related to the anonymization, sharing, portability, or deletion of your Personal Data and individual review of processing decisions. Contact us in writing with requests to exercise such rights at the address listed in the Customer Inquiries section below and we will honor such rights in accordance with applicable law. The provision of your Personal Data is voluntary. However, if you do not provide your personal data we will not be able to perform our services.

We will endeavor to respond promptly to valid data subject requests.

## 7. Complaints

You may have a right under applicable law to make a complaint if you think we have not adhered to this Notice or any applicable privacy law in handling your Personal Data. If you would like to make a complaint, please submit your complaint in writing to the contact details below most applicable to your location. We will respond to a written complaint within 30 days. If you are not satisfied with our response, you may be able to pursue your complaint with your data protection authority or privacy commissioner for your country.

## 8. Customer Inquiries

Please direct all requests relating to access, correction, and other legal rights regarding Personal Data, or any questions regarding this Notice to the location below most applicable to your location:

### **Europe, Middle East, and Africa:**

EMEA Regional Privacy Officer

33 King William Street

London, United Kingdom

EC4R 9AT

Telephone: +44 (203) 942-8000

[privacy.emea@wellsfargo.com](mailto:privacy.emea@wellsfargo.com)

### **Asia-Pacific:**

APAC Regional Privacy Officer

3 Pacific Place 1 Queens Road East

27<sup>th</sup> Floor

Hong Kong, HKG

Telephone: (852) 3650-8000

[privacy.apac@wellsfargo.com](mailto:privacy.apac@wellsfargo.com)

### **Latin America and Caribbean:**

Americas Regional Privacy Officer

23<sup>rd</sup> Floor, 22 Adelaide Street West

Toronto, Ontario

Canada M5H-4E3

Telephone: (416) 607-2900

[canadaprivacyinfo@wellsfargo.com](mailto:canadaprivacyinfo@wellsfargo.com)

Your comments are valuable to us and we assure you that we will do our best to address them.

## 9. Modifications

This Notice may be modified as a result of amendments to the law or regulations or due to other reasons. In such case, an amended Notice will be posted on our website at <http://www.wellsfargo.com/privacy-security/>. The page providing the Notice shall contain a date as to when the Notice was last updated.