

## Privacy Policy

**Effective Date: September 1, 2020**

This Privacy Policy (“**Policy**”) describes the data collected (“**Collected Data**”) by or on behalf of Raymond James Charitable Endowment Fund (“**RJ Charitable**,” “**we**,” “**us**,” or “**our**”) and its vendors, either through this website (“**Site**”) or perhaps via telephone, and how Collected Data is used and shared. If you have questions or concerns about this Policy, please contact us.

**We may modify this Policy at any time. All changes will be effective immediately upon posting to the Site. Material changes will be conspicuously posted on the Site or otherwise communicated to you.**

### We Collect Data You Provide

**Personal Information.** Although when you visit our Site we automatically collect certain data, you can visit our Site without expressly providing us with information that personally identifies you (“**Personal Information**”), such as your name, email, mailing address, or phone number. If you elect to provide us with such Personal Information, either via the Site or telephone, we will collect, use, and share it pursuant to this Policy and applicable law.

Personal Information is required to use certain Site features. For example, if you request information online or contact us (whether via email, phone, or our Contact Us form), we may retain your contact information, as well as your message’s content and our response, and will use such Personal Information to respond to communications from you or otherwise address your request. In addition, if you elect to open an account with us online for a donor advised fund, we will need to collect your name, date of birth, social security (or federal tax ID) number, address, phone, and email, to set up your donor advised fund account with RJ Charitable.

If you are accessing this Site on behalf of a client to open or maintain an account with RJ Charitable, you must ensure that you have the authorization of your client to provide RJ Charitable information that you provide.

**Nonpublic Financial Information.** If and to the extent RJ Charitable obtains nonpublic financial information as defined by the Gramm-Leach-Bliley Act (“**GLBA**”), such information is subject to our [Privacy Notice](#).

**Transaction Information.** If and to the extent you engage in any account activity with RJ Charitable via this Site, we will collect all information about such transaction and will link such information to your account as applicable. In addition, if you send us checks for your account, we will keep copies of your checks for record keeping purposes pursuant to our document and data retention policies.

**Marketing Communications; Opt Out.** If you opt in to receive marketing communications from us, you may need to submit your name, email, and zip code. We use this data to send you promotional and other electronic communications. We may use third-party providers to deliver communications to you. You may opt out of such emails by using the unsubscribe link in the email or contacting us at [rjcharitable@raymondjames.com](mailto:rjcharitable@raymondjames.com) with “Unsubscribe” in the subject line. To opt out of other communications, please contact us. Opting out of marketing communications does not opt you out of transactional communications.

### Data Automatically Collected

**IP Addresses, Cookies, & Similar Tracking Technologies.** When you use the Site, we and our Site vendors use technologies such as cookies (i.e., small pieces of data stored on your device’s hard drive by your browser), web beacons, pixel tags, and similar technologies to automatically collect internet protocol addresses assigned to the computers and other devices you use, your internet service provider, device ID number, approximate geographic location, browser type, Site pages visited, websites you access before and after visiting the Site, and data related to how and when you use the Site (e.g., date and time stamps, clickstream data, and data about search terms and websites that direct you to the Site). We may combine this Collected Data with other Collected Data (including Personal Information) and data obtained from third parties.

The Site may use session, persistent, and flash cookies (local stored objects) to collect and store data about your preferences and navigation to, from, and on our Site. Session cookies are used to complete transactions and for other purposes such as counting visits to certain webpages. Session cookies are eliminated when you exit your browser. Persistent cookies may be stored on your computer by your browser. When you log in, persistent cookies tell us if you have visited the Site before or if you are a new visitor.

Flash cookies differ from browser cookies regarding the amount and types of data collected and how the data is stored. Cookie management tools provided by your browser will not remove and cannot manage Flash cookies. To learn about managing your Flash cookie settings, visit the Flash player settings page on Adobe’s website [here](#).

Most browsers automatically accept cookies. You can disable this function, but disabling cookies may impact your use and enjoyment of the Site.

**Do Not Track Requests. DUE TO THE AUTOMATIC COLLECTION OF DATA USING COOKIES, WE DO NOT HONOR “DO NOT TRACK” REQUESTS.**

**Analytics.** We may occasionally enable and implement various analytics tools on the Site, such as Google Analytics, which is an analytics tool provided by Google to collect and process Collected Data consisting of certain telematics about your use of the Site. Google sets and reads cookies to collect such Collected Data and your web browser will automatically send such Collected Data to Google. Google uses this data to provide us with reports that we use to improve the Site’s structure and content. We do not participate in online behavioral advertising or track your online activity across third party websites.

To learn more about how Google uses data, visit [Google’s Privacy Policy](#) and Google’s page on “[How Google uses data when you use our partners’ sites or apps.](#)” You may download and install the [Google Analytics Opt-out Browser Add-on](#) for each web browser you use. Using the Google Analytics Opt-out Browser Add-on does not prevent the use of other analytics tools. To learn more about Google Analytics cookies, visit [Google Analytics Cookie Usage on Sites](#).

### **How We Use & Share Collected Data**

Beyond the uses and sharing described above, RJ Charitable and its vendors may use and share Collected Data (including Personal Information) as described below. We do not sell or rent Collected Data except as stated in this Policy and as permitted by applicable law.

**Purpose Collected & Communication with You.** We use and share Collected Data for the purpose for which it was collected or provided to us. For example, if you contact us for support or assistance, we will use Collected Data to contact you and assist you with your request. If you send us information to open an account with us, we will use Collected Information to operate your account and provide you with account

services. We may use Collected Data to notify you of Site changes (e.g., changes to our Terms of Use or this Policy), and if you opt in, to send you marketing communications.

**Vendors, & Other Partners.** We may share Collected Data with our third-party vendors, service providers, suppliers, and consultants, including Raymond James Trust, which is the primary service provider to RJ Charitable to provide fund administration services, Site management and hosting, marketing and public relations, email services, and data processing services to us (e.g., to support the delivery of, provide functionality on, or help to enhance the security of the Site) for purposes described in this Policy or communicated to you when we collect such data. The parties described in this paragraph are authorized and may use and disclose Collected Data as needed to provide the applicable services to us.

**Security.** In addition, we share Collected Data with certain third party vendors for security checks related to identify verification related to our donor advised account services, such as checks for lists of Specially Designated Nationals and other restrictions maintained by the United States Office of Foreign Asset Control, as well as other security checks such as anti-money laundering and fraud prevention.

**Aggregated Data.** We may use Collected Data to create anonymous aggregate data. We may use and share such aggregate data with our vendors and other third parties to: (1) analyze, develop, and improve the content and services that we make available, (2) inform business strategies, (3) understand the Site's demographics and user preferences, (4) customize promotional emails and users' Site experience, and (5) for other lawful purposes.

**Protection of Rights.** We may use Collected Data and share it with third parties if we believe it is needed to operate the Site or to protect our rights or the rights of others, including sharing data needed to identify, contact, or bring legal action if our contracts, terms, or policies are violated or if required by law.

**Business Transactions.** All Collected Data is exclusively our property. If we undergo a change or contemplated change in control, acquisition, merger, reorganization, or asset sale, all Collected Data may be transferred, sold, shared, or otherwise shared with potential and actual successors, which will be bound by this Policy as it applies to Collected Data.

**With Your Consent.** With your consent, we may use or share Collected Data in ways not specifically described in this Policy.

### **Data We Do Not Intend to Collect**

1. **Special Categories of Personal Information.** "Special Data" is any data that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, or that involves genetic or biometric data or data concerning health or sexual orientation. We do not intend to collect any Special Data from you. Please do not provide Special Data to us.

2. **Children.** We are committed to protecting children's privacy. The Site is not directed at children under 13 years of age. We do not knowingly collect, use, or share data from children under 13. If a parent or legal guardian learns their child provided us with Personal Information without his or her consent, please contact us.

### **Data Security**

We use commercially reasonable technical and organizational measures to help secure all Collected Data against loss, misuse, and alteration. While we cannot guarantee it, we use industry-standard protections to

help safeguard against such occurrences. If a breach of our systems occurs, we will notify you of the breach if and as required under applicable law.

YOU UNDERSTAND THAT NO DATA TRANSMISSION OVER THE INTERNET OR A MOBILE DEVICE CAN BE GUARANTEED TO BE 100% SECURE. WHILE WE STRIVE TO PROTECT YOUR PERSONAL INFORMATION, WE DO NOT GUARANTEE THE SECURITY OF PERSONAL INFORMATION AND YOU PROVIDE PERSONAL INFORMATION AT YOUR OWN RISK.

### **Access from Outside the United States**

This Site is operated and maintained on behalf of RJ Charitable from the United States and is intended solely for a United States audience. If you access the Site from outside the United States, please be aware that Collected Data will be transferred to, stored in, and processed in the United States. U.S. data protection and related laws may not be as comprehensive as those from where you access the Site.

### **Third-Party Sites**

The Site may link to, or be linked to, websites not controlled by us. We are not responsible for third-parties' privacy policies or practices. This Policy does not apply to any third-party websites or to any data that you provide to third parties. You should read the privacy policy for each website that you visit.

### **Access & Update Your Personal Information**

To access or update your Personal Information as it exists in our records, please contact us using the information below.

### **Contact Us**

If you have questions or concerns regarding this Policy, contact us at:

Raymond James Charitable  
P.O. Box 23559  
St. Petersburg, FL 33742

880 Carillon Parkway  
St. Petersburg, FL 33716

727-567-7221  
866-687-3863 (toll free)

[rjcharitable@raymondjames.com](mailto:rjcharitable@raymondjames.com).