

PRIVACY NOTICE

Last updated: **Oct. 1, 2018**

State Street Bank and Trust Company, its parent and its affiliates (collectively, “State Street”) respect and are committed to protecting your privacy. This Privacy Notice applies to the processing of personal data through State Street Learning Management System (“LMS”).

The types of personal data we collect

“Personal data” is data that can identify you or that can potentially be otherwise linked to you (“Data”). For the purposes of State Street LMS, the Data collected will be limited to your name, email address, IP address and completion records of the training modules assigned to you.

Our basis for using your personal data

State Street may collect your Data for compliance with any applicable State Street policies and Standard of Conduct, procedures, laws, and regulations (including governmental reporting). If you fail to provide certain information when requested, we may not be able to perform the contractual commitments we have entered into with you, or we may be prevented from complying with our legal and/or regulatory obligations.

How we use and share the Data we collect

Your Data concerning the training modules assigned to you will be processed in order to fulfill our regulatory obligations and best practice. To the extent permitted by local law, your Data may be transferred among State Street’s group companies and will be processed by State Street personnel for the purposes specified in this Privacy Notice. Your Data may also be shared – to the extent required for the performance of the service - with Cornerstone on Demand (“Cornerstone”), a third party vendor based in Santa Monica (CA), that provides services related to the LMS platform as well as to its sub-contractors. We require third parties to respect the security of your Data and to treat it in accordance with the law. If we do share your Data, you can expect a similar degree of protection in respect of your personal information.

How long we will keep your Data

Your Data provided will be retained only for so long as necessary to achieve the specified purposes mentioned in this Privacy Notice.

How We Transfer Personal Data

State Street and its affiliates and third party service providers transfer personal data to the United States and may transfer personal data to other countries where State Street does business, which may not have the same data protection laws and the same statutory protections for personal data as those found in the jurisdiction in which you reside. Where this is the case, State Street will seek to implement suitable safeguards before personal data is transferred to other countries in compliance with the applicable laws.

You Data may be stored outside the country in which you reside such as on servers located in the United States. Personal data stored or processed in a foreign jurisdiction may be accessed under a lawful order made in that jurisdiction.

Cookies

The LMS makes use of cookies to facilitate your use of the site, store online preferences, track usage of the site or enhance security. Cookies are text files containing small amounts of information downloaded to your computer or device when you visit a site. Cookies are then sent back to the originating site on each subsequent visit, or to another site that recognises that cookie. More information about cookies can be found at www.allaboutcookies.org.

For individuals within the European Union, you have the right to know what personal we process about you and request a copy. You are entitled to have incorrect personal data about you corrected and in some instances, you may request State Street to delete your personal data. You may also object to certain personal data about you being processed and request the processing to be limited. If you are dissatisfied with how State Street processes your personal data, you have a right to report this to the relevant supervisory authority.

If you have any questions or concerns or do not wish to proceed, please notify MyLearning@statestreet.com.