



RAYMOND JAMES (USA) LTD. (RJLU) PRIVACY NOTICE – CALIFORNIA RESIDENTS

This Privacy Notice of Raymond James (USA) Ltd. (“RJLU”, “we,” “us,” “our”) for California residents (the “Notice”) applies solely to individuals who interact or have a relationship with RJLU and who reside in the State of California (“consumers” or “you”). We have adopted this Notice to comply with the California Consumer Privacy Act, 2018, as amended (“CCPA”) and the California Privacy Rights Act, 2020, as amended (“CPRA”).

RAYMOND JAMES[®]
RAYMOND JAMES (USA) LTD.

What is Personal Information?

Under the CCPA, “Personal Information” is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked -- directly or indirectly -- with a particular consumer or household (CCPA §1798.140(O)(1)). 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, or (k) inferences from the above categories used to profile, or (l) sensitive Personal Information.

Personal information does not include:

- Publicly available information from government records.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like:
 - o health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - o Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

Information RJLU Collects About You

RJLU does not “sell” Personal Information and has not “sold” Personal Information relating to you, including within the meaning of the CCPA within the past 12 months. For purposes of this disclosure, “sell” or “sold” means the disclosure of Personal Information to a third party for monetary or other valuable consideration.

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

Table 1: Types of Personal Information as defined in CCPA § 1798.140(o) (A- L)

Category	Examples	Purpose	Sources of Personal Information	Categories of Third Parties with Whom Personal Information is Shared
Identifiers	First name, maiden name, last name, username or similar identifier, marital status, date of birth and gender.	<ul style="list-style-type: none">• Create, maintain, customize, and secure your account(s)• Perform identity verification• Process transactions• Detect and prevent fraud	<ul style="list-style-type: none">• Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us.	<ul style="list-style-type: none">• Service providers performing necessary business functions.• Law Enforcement, self-regulatory organizations (e.g., FINRA), and regulators as required by law.

Category	Examples	Purpose	Sources of Personal Information	Categories of Third Parties with Whom Personal Information is Shared
		<ul style="list-style-type: none"> • Respond to court orders and legal investigations • Report to credit bureaus • Market our products and services 	<ul style="list-style-type: none"> • Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services and marketing to them. • From third parties that interact with us in connection with the services we perform or products we provide. For example, from outside companies we may use to assist us in providing you with our services or products. 	
Characteristics of protected classifications under California or Federal Law	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status.	<ul style="list-style-type: none"> • Create, maintain, customize, and secure your account(s) • Perform identity verification • Manage consumer relationship • Market our products and services 	<ul style="list-style-type: none"> • Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us. • Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services and marketing to them. • From third parties that interact with us in connection with the services we perform or products we provide. For example, from outside companies we may use to assist us in providing you with our services or products. 	<ul style="list-style-type: none"> • Service providers performing necessary business functions. • Law Enforcement, self-regulatory organizations (e.g., FINRA), and regulators as required by law.
Commercial Information	Records of products or services purchased, or considered, other purchasing or consuming histories or tendencies.	<ul style="list-style-type: none"> • Create, maintain, customize, and secure your account(s) • Process transactions • Detect and prevent fraud • Respond to court orders and legal investigations • Report to credit bureaus • Market our products and services 	<ul style="list-style-type: none"> • Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us. 	<ul style="list-style-type: none"> • Service providers performing necessary business functions. • Law Enforcement, self-regulatory organizations (e.g., FINRA), and regulators as required by law.

Category	Examples	Purpose	Sources of Personal Information	Categories of Third Parties with Whom Personal Information is Shared
			<ul style="list-style-type: none"> Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services and marketing to them. From third parties that interact with us in connection with the services we perform or products we provide. For example, from outside companies we may use to assist us in providing you with our services or products. 	
Internet or Electronic Data	Information regarding a consumer's interaction with an internet Web site, application, or advertisement.	<ul style="list-style-type: none"> Risk and security control and monitoring. Detect and prevent fraud. Support, personalize and develop our Website and online products and services. Respond to court orders and legal investigations. Market our products and services. 	<ul style="list-style-type: none"> Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us. Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services and marketing to them. From third parties that interact with us in connection with the services we perform or products we provide. For example, from outside companies we may use to assist us in providing you with our services or products. Directly and indirectly from activity on our website or third party websites through which we advertise. For example, from submissions through our website portal or website usage details collected automatically. 	<ul style="list-style-type: none"> Service providers performing necessary business functions. Law Enforcement, self-regulatory organizations (e.g., FINRA), and regulators as required by law.

Category	Examples	Purpose	Sources of Personal Information	Categories of Third Parties with Whom Personal Information is Shared
Geolocation Data	Physical location.	<ul style="list-style-type: none"> • Risk and security control and monitoring. • Detect and prevent fraud. • Support, personalize and develop our Website and online products and services. 	<ul style="list-style-type: none"> • Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us. • Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services and marketing to them. • Directly and indirectly from activity on our website or third-party websites through which we advertise. For example, from submissions through our website portal or website usage details collected automatically. 	<ul style="list-style-type: none"> • Service providers performing necessary business functions. • Law Enforcement, self-regulatory organizations (e.g., FINRA), and regulators as required by law.
Sensory Data	Audio, electronic, and visual information.	<ul style="list-style-type: none"> • Record phone lines for regulatory requirements and to monitor customer service quality. • Physical security. • Respond to court orders and legal investigations. 	<ul style="list-style-type: none"> • Directly from our clients or their agents. For example, from documents that our clients provide to us related to the products and services for which they engage us. • Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services and marketing to them. 	<ul style="list-style-type: none"> • Service providers performing necessary business functions. • Law Enforcement, self-regulatory organizations (e.g., FINRA), and regulators as required by law.
Professional Related Data	Work history, prior employer.	<ul style="list-style-type: none"> • Create, maintain, and customize your account(s) • Manage consumer relationship 	<ul style="list-style-type: none"> • Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us. • Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services and marketing to them. 	<ul style="list-style-type: none"> • Law Enforcement, self-regulatory organizations (e.g., FINRA), and regulators as required by law.

Category	Examples	Purpose	Sources of Personal Information	Categories of Third Parties with Whom Personal Information is Shared
Inferences	Drawn from any of the information identified in this table to create a profile about a consumer reflecting the consumer's preferences.	<ul style="list-style-type: none"> • Create, maintain, and customize your account(s) • Manage consumer relationship • Market our products and services 	<ul style="list-style-type: none"> • Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services and marketing to them. • From third parties that interact with us in connection with the services we perform or products we provide. For example, from outside companies we may use to assist us in providing you with our services or products. 	<ul style="list-style-type: none"> • Service providers performing necessary business functions. • Law Enforcement, self-regulatory organizations (e.g., FINRA), and regulators as required by law.
Sensitive Information	Identifiers such as social security number or driver's license number; a unique account number or account log-in in combination with any required security or access code, password, or credentials allowing access to an account; geolocation data; and certain characteristics such as racial or ethnic origin and religion.	<ul style="list-style-type: none"> • Create, maintain, customize, and secure your account(s) • Process transactions • Detect and prevent fraud. • Respond to court order and legal investigations. • Risk and security control and monitoring • Support, personalize and develop our website and online products and services. 	<ul style="list-style-type: none"> • Directly from our clients or their agents. For example, from documents that our clients provide to us related to the services for which they engage us. • Indirectly from our clients or their agents. For example, through information we collect from our clients in the course of providing services and marketing to them. • From third parties that interact with us in connection with the services we perform or products we provide. For example, from outside companies we may use to assist us in providing you with our services or products. 	<ul style="list-style-type: none"> • Service providers performing necessary business functions. • Law Enforcement, self-regulatory organizations (e.g., FINRA), and regulators as required by law.

We will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

We do not process sensitive 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.

Retention Period

We will not retain Personal Information longer than necessary to fulfill the purposes for which it is processed, including 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

RJLU shares your Personal Information with third parties and service providers when necessary for business purposes. When RJLU shares your Personal Information, it is contractually protected by both RJLU and the applicable third party or service provider in question.

The categories of Personal Information we may share may include the categories listed in Table 1 above.

The categories of third parties and service providers we may share your Personal Information with includes: our affiliates and subsidiaries, service providers performing necessary business functions, financial advisors registered with RJLU, introducing broker-dealer or registered investment advisers, and law enforcement, self-regulatory organizations (e.g., FINRA), and regulators as required by 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 RJLU, please contact us and we will take appropriate action.

Your Rights

Under the CCPA, you have specific rights regarding your Personal Information held by private companies. The below section describes your rights and how to exercise them. We do not process sensitive 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.

Disclosure

You have the right to ask us to disclose to you any Personal Information we have collected about you in the last 12 months (CCPA 1788.100). In order to exercise this right, RJLU must first verify your identity to ensure it is a legitimate request, and then disclose to you:

- *The categories of Personal Information we have collected about you.*
 - *The types of sources used to collect Personal Information about you.*
 - *The types of third parties or service providers with which we have shared any of your Personal Information (if applicable).*
 - *The business or commercial purpose(s) for collecting your Personal Information.*
 - *The specific pieces of Personal Information we collected about you (also called a data portability request).*
 - *The categories of Personal Information that have been disclosed for a business purpose that each category of recipient obtained.*
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Correction

You have the right to ask us to correct Personal Information that we have collected about you. In order to exercise this right, RJLU 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. In order to exercise this right, RJLU must first verify your identity to ensure it is a legitimate request. We will then delete the relevant information unless an exemption applies (CCPA 1798.105).

We may deny your deletion request if retaining the information is necessary for us or our third parties or service providers to:

- *Complete the transaction for which we collected the Personal Information, provide a product or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.*
- *Detect security incidents; protect against malicious, deceptive, fraudulent, or illegal activity; or prosecute those responsible for such activities.*
- *Debug products to identify and repair errors that impair existing intended functionality.*
- *Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.*
- *Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).*
- *Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.*
- *Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.*
- *Comply with a legal obligation.*
- *Make other internal and lawful uses of that information that are compatible with the context in which you provided it.*

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

Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to your Personal Information. If an authorized agent submits a request on your behalf, you may be asked to verify your identity directly with RJLU. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- *Provide sufficient information that allows us to reasonably verify you are the person (or an authorized representative) about whom we collected Personal Information; and*
- *Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.*

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use Personal Information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response using the contact information we have on file for that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

You have the right to be free from unlawful discrimination for exercising your rights under the CCPA (CCPA §1798.125).

Changes to This Notice

RJLU reserves the right to update or change the information contained in this 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 (www.raymondjames.ca) periodically to learn of any changes to our Notice.

Contact Information

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

Phone: 416-777-6438

Website: www.raymondjames.ca

Email: privacyofficer@raymondjames.ca

When you contact us, please provide the following:

- Type of request (access, correction, data portability, or deletion)
- Your relationship to RJLU (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