

California Notice at Collection and Privacy Notice

Last revised: 6/16/23

This Brandes California Notice at Collection and Privacy Notice (“**California Privacy Notice**”) is only applicable to California residents (“**you**”). It supplements the information contained in our **Online Privacy Policy**. It is delivered on behalf of Brandes Investment Partners, L.P. (“**Brandes**”) and our affiliates or subsidiaries and governs certain personal information we collect from you.

We have adopted this California Privacy Notice to comply with the California Consumer Privacy Act, Cal. Civ. Code §§ 1798.100 et seq. (“**CCPA**”). Please take the time to read and understand this California Privacy Notice.

Scope

This California Privacy Notice covers personal information we collect automatically from California-resident individuals that visit our Website. In certain contexts, it also covers personal information we collect from California-resident representatives of companies and institutions with whom we communicate, do business or to whom we provide products or services.

There is other personal information that this California Privacy Notice does not cover. In some cases, that personal information may not be subject to the CCPA. In other cases, a different privacy notice may apply. Accordingly, this California Privacy Notice and/or the California privacy rights set out herein may not apply to you or to all of your personal information. For example, the following personal information is not covered by this California Privacy Notice:

- Personal information that is collected, processed, sold or disclosed pursuant to the federal Gramm Leach Bliley Act (“**GLBA**”) and implementing regulations;
 - To understand how we collect, use and disclose your nonpublic personal information in accordance with the GLBA, please read our Consumer Privacy Notice;
- Personal information we have from California residents in their capacity as current or former employees or personnel of Brandes;
- Personal information we have from California residents who are emergency contacts of, or benefits recipients related to, current or former employees or personnel of Brandes;
- Personal information we have from California residents in their capacity as owners, directors or officers of Brandes;
- Personal information we have from California residents in their capacity as current or former job applicants to Brandes;
 - California-Resident Brandes Job Applicants: Please read [Brandes’ California Resident Applicant Privacy Notice](#);
- Personal information we collect from California residents when acting in their capacity as representatives of institutional clients or fund shareholders;
 - If you interact with us in such capacity, please see our [Brandes Privacy Notice for California Resident Representatives of Separately Managed Account Clients](#) for more information.

Notice at Collection

The following table sets forth the categories of personal information we may collect from you as a business; the purposes for which we use it; and whether we “sell” or “share” it for purposes of the CCPA (as those terms are used in the CCPA). Our collection, use and disclosure of personal information depends on your relationship with us and your interaction with us.

Category of Personal Information	Purpose for Collecting the Personal Information	Whether We “Share” the Category of Personal Information for Cross-Context Behavioral Advertising	Whether we “Sell” the Category of Personal Information
Identifiers and Categories in Cal. Civ. Code 1798.80(e) , such as name, unique personal identifier, online identifier, IP address, email address, account name, phone number or signature	<ul style="list-style-type: none"> • Purpose for Collecting the Personal Information • To present our Website and its contents to you • To deliver the information, products and services you requested from us • To fulfill any other purpose for which you provide it • To reach out to you about and market or promote new information to you • To communicate with you • To help us improve our Website and deliver a more personalized experience • To monitor the security of our offices • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	No	No
Characteristics of Protected Classifications under California or Federal Law , , such as race, sex, gender, sexual orientation, marital status, military or veteran status, nationality	<ul style="list-style-type: none"> • To personalize communications that deliver the information, products and services you requested from us or provide information about products and services that we believe may be of interest to you • To fulfill any other purpose for which you provide it • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	No	No

Category of Personal Information	Purpose for Collecting the Personal Information	Whether We "Share" the Category of Personal Information for Cross-Context Behavioral Advertising	Whether we "Sell" the Category of Personal Information
Commercial information , such as records of products or services purchased, obtained or considered, or other purchasing or consuming histories of tendencies	<ul style="list-style-type: none"> • To present our Website and its contents to you • To deliver the information, products and services you requested from us • To fulfill any other purpose for which you provide it • To reach out to you about and market or promote new information to you • To communicate with you • To help us improve our Website and deliver a more personalized experience • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	No	No
Internet or other electronic network activity information , such as browsing history, search history or information regarding interaction with a website, app or advertisement	<ul style="list-style-type: none"> • To present our Website and its contents to you • To deliver the information, products and services you requested from us • To fulfill any other purpose for which you provide it • To reach out to you about and market or promote new information to you • To communicate with you • To help us improve our Website and deliver a more personalized experience • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	No	No

Category of Personal Information	Purpose for Collecting the Personal Information	Whether We "Share" the Category of Personal Information for Cross-Context Behavioral Advertising	Whether we "Sell" the Category of Personal Information
Geolocation data , such as the state or country associated with your IP address	<ul style="list-style-type: none"> • To present our Website and its contents to you • To deliver the information, products and services you requested from us • To fulfill any other purpose for which you provide it • To reach out to you about and market or promote new information to you • To communicate with you • To help us improve our Website and deliver a more personalized experience • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	No	No
Audio, electronic, visual, thermal, olfactory or similar information , such as a recording of your voice or photo or video of you	<ul style="list-style-type: none"> • To deliver the information, products and services you requested from us • To fulfill any other purpose for which you provide it • To communicate with you • To monitor the security of our offices • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	No	No

Category of Personal Information	Purpose for Collecting the Personal Information	Whether We "Share" the Category of Personal Information for Cross-Context Behavioral Advertising	Whether we "Sell" the Category of Personal Information
Professional or employment information, such as your job title or employer	<ul style="list-style-type: none"> • To present our Website and its contents to you • To deliver the information, products and services you requested from us • To fulfill any other purpose for which you provide it • To reach out to you about and market or promote new information to you • To communicate with you • To help us improve our Website and deliver a more personalized experience • To monitor the security of our offices • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	No	No
Inferences drawn from the information listed above to create a profile about a California resident reflecting their preferences, characteristics and other attributes	<ul style="list-style-type: none"> • To present our Website and its contents to you • To deliver the information, products and services you requested from us • To fulfill any other purpose for which you provide it • To reach out to you about and market or promote new information to you • To communicate with you • To help us improve our Website and deliver a more personalized experience • To monitor the security of our offices • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	No	No

We do not collect sensitive personal information from you pursuant to this California Privacy Notice.

Third-Party Recipient: We may act as a third-party recipient of personal information about California-resident individuals or representatives of companies with whom we believe we may be interested in doing business. The categories of personal information we receive about such individuals may include: (i) Identifiers and Categories in Cal. Civ Code 1798.80(e), such as name, online identifier, or email address; (ii) Geolocation data, such as physical or mailing address; (iii) Internet or Other Network Activity, such as information regarding interaction with a social media website or app; (iv) Professional or employment information, such as current and former job title and employer; and (v) Inferences drawn from the above. We use each category of personal information to contact such individuals about products and services we believe may be of interest to them, or as otherwise permitted or required by law. We do not “share” or “sell” this personal information, as such terms are defined in the CCPA.

Data Retention: We will retain your personal information for as long as necessary to fulfill the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements. To determine the appropriate retention period for your personal information, we will consider the amount, nature and sensitivity of the personal information, the potential risk from unauthorized use or disclosure, the purposes for which we process personal information and whether we can achieve those purposes through other means, and applicable legal requirements.

Our Prior Collection, Use and Disclosure of Personal Information During the Preceding 12 Months

The CCPA requires us to give you specific information about the categories of personal information we collect about you, the sources from which we have obtained that information, the purposes for which we collect it and the categories of entities to whom we disclose it. The table below sets out our relevant practices over the last twelve months. **Our collection, use and disclosure of personal information depends on your relationship with us and your interaction with us.**

Category of Personal Information	Categories of Sources From Which Collected	Business or Commercial Purpose for Collecting PI	Categories of Third Parties and Other Entities With Whom We May Disclose
Identifiers and Categories in Cal. Civ. Code 1798.80(e) , such as name, unique personal identifier, online identifier, IP address, email address, account name, phone number or signature	<ul style="list-style-type: none"> • Directly from you, such as when you visit our website, via written forms, or vendor management portals • From your brokerage or financial advisory firm, financial adviser or consultant • Via social media platforms and other third-party services • Via email or other correspondence with you • Via cookies and other tracking technologies 	<ul style="list-style-type: none"> • To present our Website and its contents to you • To deliver the information, products and services you requested from us • To fulfill any other purpose for which you provide it • To reach out to you about and market or promote new information to you • To communicate with you • To help us improve our Website and deliver a more personalized experience • To monitor the security of our offices • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	<ul style="list-style-type: none"> • Our affiliates • Our business partners, service providers and vendors • Legal authorities as required by law or to protect our rights • Analytics providers • Affiliated and nonaffiliated third party as may be permitted by law (such as in connection with the Sale or restructuring of all or part of our business)
Characteristics of Protected Classifications under California or Federal Law , such as gender	<ul style="list-style-type: none"> • Directly from you, such as via written or online forms, or vendor management portals • From your brokerage or financial advisory firm, financial adviser or consultant • Via email or other correspondence with you 	<ul style="list-style-type: none"> • To personalize communications that deliver the information, products and services you requested from us or provide information about products and services that we believe may be of interest to you • To fulfill any other purpose for which you provide it • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	<ul style="list-style-type: none"> • Our affiliates • Our business partners, service providers and vendors • Legal authorities as required by law or to protect our rights • Affiliated and nonaffiliated third party as may be permitted by law (such as in connection with the Sale or restructuring of all or part of our business)

Category of Personal Information	Categories of Sources From Which Collected	Business or Commercial Purpose for Collecting PI	Categories of Third Parties and Other Entities With Whom We May Disclose
<p>Commercial information, such as records of products or services purchased, obtained or considered, or other purchasing or consuming histories or tendencies</p>	<ul style="list-style-type: none"> • Directly from you, such as when you visit our website, via written forms, or vendor management portals • From your brokerage or financial advisory firm, financial adviser or consultant • Via social media platforms and other third-party services • Via email or other correspondence with you • Via cookies and other tracking technologies 	<ul style="list-style-type: none"> • To present our Website and its contents to you • To deliver the information, products and services you requested from us • To fulfill any other purpose for which you provide it • To reach out to you about and market or promote new information to you • To communicate with you • To help us improve our Website and deliver a more personalized experience • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	<ul style="list-style-type: none"> • Our affiliates • Our business partners, service providers and vendors • Legal authorities as required by law or to protect our rights • Analytics providers • Affiliated and nonaffiliated third party as may be permitted by law (such as in connection with the Sale or restructuring of all or part of our business)
<p>Internet or other electronic network activity information, such as browsing history, search history or information regarding interaction with a website, app or advertisement</p>	<ul style="list-style-type: none"> • Directly from you, such as when you visit our Website or via vendor management portals • Via social media platforms and other third-party services • Via email or other correspondence with you • Via cookies and other tracking technologies 	<ul style="list-style-type: none"> • To present our Website and its contents to you • To deliver the information, products and services you requested from us • To fulfill any other purpose for which you provide it • To reach out to you about and market or promote new information to you • To communicate with you • To help us improve our Website and deliver a more personalized experience • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	<ul style="list-style-type: none"> • Our affiliates • Our business partners, service providers and vendors • Legal authorities as required by law or to protect our rights • Analytics providers • Affiliated and nonaffiliated third party as may be permitted by law (such as in connection with the Sale or restructuring of all or part of our business)

Category of Personal Information	Categories of Sources From Which Collected	Business or Commercial Purpose for Collecting PI	Categories of Third Parties and Other Entities With Whom We May Disclose
<p>Geolocation data, such as the state or country associated with your IP address</p>	<ul style="list-style-type: none"> • Directly from you, such as when you visit our website, via written forms, or vendor management portals • From your brokerage or financial advisory firm, financial adviser or consultant • Via social media platforms and other third-party services • Via email or other correspondence with you • Via cookies and other tracking technologies 	<ul style="list-style-type: none"> • To present our Website and its contents to you • To deliver the information, products and services you requested from us • To fulfill any other purpose for which you provide it • To reach out to you about and market or promote new information to you • To communicate with you • To help us improve our Website and deliver a more personalized experience • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	<ul style="list-style-type: none"> • Our affiliates • Our business partners, service providers and vendors • Legal authorities as required by law or to protect our rights • Analytics providers • Affiliated and nonaffiliated third party as may be permitted by law (such as in connection with the Sale or restructuring of all or part of our business)
<p>Audio, electronic, visual, thermal, olfactory or similar information, such as a recording of your voice or photo or video of you</p>	<ul style="list-style-type: none"> • Via phone calls and videoconferences • From your brokerage or financial advisory firm, financial adviser or consultant • Via social media platforms and other third-party services • When we take or receive a photograph or video of you • When you visit our offices 	<ul style="list-style-type: none"> • To deliver the information, products and services you requested from us • To fulfill any other purpose for which you provide it • To communicate with you • To monitor the security of our offices • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	<ul style="list-style-type: none"> • Our affiliates • Our business partners, service providers and vendors • Legal authorities as required by law or to protect our rights • Affiliated and nonaffiliated third party as may be permitted by law (such as in connection with the Sale or restructuring of all or part of our business)

Category of Personal Information	Categories of Sources From Which Collected	Business or Commercial Purpose for Collecting PI	Categories of Third Parties and Other Entities With Whom We May Disclose
<p>Professional or employment information, such as your job title or employer</p>	<ul style="list-style-type: none"> • Directly from you, such as when you visit our website, via written forms, or vendor management portals • From your brokerage or financial advisory firm, financial adviser or consultant • Via social media platforms and other third-party services • Via email or other correspondence with you • Via cookies and other tracking technologies 	<ul style="list-style-type: none"> • To present our Website and its contents to you • To deliver the information, products and services you requested from us • To fulfill any other purpose for which you provide it • To reach out to you about and market or promote new information to you • To communicate with you • To help us improve our Website and deliver a more personalized experience • To monitor the security of our offices • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	<ul style="list-style-type: none"> • Our affiliates • Our business partners, service providers and vendors • Legal authorities as required by law or to protect our rights • Affiliated and nonaffiliated third party as may be permitted by law (such as in connection with the Sale or restructuring of all or part of our business)
<p>Inferences drawn from the information listed above to create a profile about a California resident reflecting their preferences, characteristics and other attributes</p>	<ul style="list-style-type: none"> • Directly from you, such as when you visit our website, via written forms, or vendor management portals • From your brokerage or financial advisory firm, financial adviser or consultant • Via social media platforms and other third-party services • Via email or other correspondence with you • Via cookies and other tracking technologies 	<ul style="list-style-type: none"> • To present our Website and its contents to you • To deliver the information, products and services you requested from us • To fulfill any other purpose for which you provide it • To reach out to you about and market or promote new information to you • To communicate with you • To help us improve our Website and deliver a more personalized experience • To monitor the security of our offices • To carry out our obligations and enforce our rights • In any other way we describe when you provide the information, or otherwise at your direction or with your consent • As permitted or required by law or as we may notify you 	<ul style="list-style-type: none"> • Our affiliates • Our business partners, service providers and vendors • Legal authorities as required by law or to protect our rights • Analytics providers • Affiliated and nonaffiliated third party as may be permitted by law (such as in connection with the Sale or restructuring of all or part of our business)

We do not collect sensitive personal information from you pursuant to this California Privacy Notice.

How We Disclose Personal Information

In the past twelve months, we have **disclosed the following categories of personal information** for business purposes:

- Identifiers
- Categories of Personal Information described in Cal. Civ. Code Section 1798.80(e)
- Characteristics of Protected Classifications under California or Federal Law
- Commercial Information
- Internet or other electronic network activity information
- Geolocation data
- Audio, electronic, visual, thermal, olfactory or similar information
- Professional or employment information
- Inferences drawn from other personal information

Sales of Personal Information

We do not sell your personal information for purposes of the CCPA and have not done so in the past twelve months.

Sharing of Personal Information for Cross-Context Behavioral Advertising

We do not share your personal information for purposes of the CCPA and have not done so in the past twelve months

Minors Under the Age of 16

We do not have actual knowledge that we sell or share the personal information of minors under the age of 16.

Your Rights as a California Resident

As a California resident, you may have certain rights in relation to your personal information.

Right to Know

You may have the **right to know** how we have collected, used and disclosed your personal information. Specifically, you may have the right to know:

- The categories of personal information we have collected about you.
- The categories of sources from which we have collected your personal information.
- The business or commercial purpose for which we collect, sell or share your personal information.
- The categories of third parties to whom we have disclosed your personal information.
- The categories of personal information that we have sold or shared about you and the categories of third parties to whom it was sold or shared.
- The categories of personal information we have disclosed about you for a business purpose and the categories of persons to whom we have disclosed it.

In addition, you may have the right to know the specific pieces of personal information we have collected about you. Subject to certain limitations, you may request that we provide this information dating back to January 1, 2022.

Right to Make a Deletion Request

You may have the right to request that we delete your personal information that we have collected or received. Subject to certain exceptions, we must delete your personal information and direct our service providers and contractors to delete your personal information.

Right to Correct Inaccurate Personal Information

You may have the right to request that we correct inaccurate personal information about you, taking into account the nature of the personal information and the purposes of the processing of the personal information.

Right to Opt-Out of Sales of Personal Information

If we were to sell your personal information for purposes of the CCPA, you may have the right to opt-out of the sale of your personal information.

Right to Opt-Out of Sharing of Personal Information

If we were to share your personal information for cross-context behavioral advertising purposes for purposes of the CCPA, you may have the right to opt-out of that sharing.

Right to Limit Use and Disclosure of Sensitive Personal Information

If we were to collect sensitive personal information about you pursuant to this California Privacy Notice, subject to certain exceptions, you may have the right to limit our use and disclosure of your sensitive personal information. We do not collect sensitive personal information from you pursuant to this California Privacy Notice.

Right to Non-Discrimination

You have the right not to be discriminated against by us for choosing to exercise your rights under the CCPA.

How to Exercise Your California Privacy Rights

If you wish to exercise your right to know, delete or correct inaccuracies in your personal information, please submit a request to us [here](#), call us at 800.237.7119 or contact us at privacy@brandes.com.

Information for Authorized Agents

You can authorize a person (“**Authorized Agent**”) registered with the California Secretary of State to exercise your California privacy rights on your behalf. An Authorized Agent can also include a person who has power of attorney or is acting as a conservator. To submit a request to Brandes on behalf of another person as an Authorized Agent, please submit a request to us [here](#), call us at 800.237.7119 or contact us at privacy@brandes.com.

Verifying Your Requests

We only respond to your requests to know, access the specific pieces of personal information we have about you, delete and correct inaccurate personal information when we can verify that you are a California resident exercising your rights regarding your personal information.

We may need to ask you for personal information to verify your request so we can match it to the personal information we already have about you. We may also need to obtain additional information about you that we do not already have. If you provide us with new personal information that we do not already have about you, we will use it solely for the purpose of verifying your request. We will let you know via email if we need more information from you to verify your request. Please reply to our requests promptly.

We will communicate with you about your requests via email. We will use the email address you provided when submitting your request.

If we cannot verify your identity, we will let you know.

Responding To Your Requests

We aim to promptly verify and respond to your requests within 45 days of receipt but may require a total of up to 90 days to respond to your requests. If we require additional time beyond the initial 45 days after we receive your request, we will let you know within the first 45 days.

We do not ordinarily charge a fee for our response to your requests. However, we may do so to the extent your request(s) are excessive, repetitive, or manifestly unfounded. If we determine that charging a fee is warranted, we will let you know and will provide you with an estimate of the associated costs of responding to your request(s).

If we determine that we cannot or will not take the action that you requested, we will let you know. We will inform you of our reasons for not taking action and any rights you may have to appeal the decision.

Unless you tell us that you would like to receive a response via postal mail, we will respond to you via email regarding your requests to know and to access the specific pieces of personal information we have about you. We will contact you at the email address you provided when submitting your request(s). If you would like to receive responses to a request to know or access personal information via postal mail rather than email, please let us know when submitting your request(s).

Limitations

The CCPA does not apply in full to all personal information we collect from California residents. As set out in “Scope” above, the CCPA is not fully applicable to much of the personal information we collect from California residents. Therefore, even if you are a California resident and submit a verifiable request, we may not be required to comply with your request.

We are only required to respond to certain requests twice in any twelve-month period. We are not required to provide you access to specific pieces of personal information more than twice in any twelve-month period. Similarly, we are not required to comply with your “requests to know” more than twice in any twelve-month period.

Changes to Our California Privacy Notice

From time to time, Brandes [or its affiliates or subsidiaries] may update or revise this California Privacy Notice. If there are changes to the terms of this California Privacy Notice, an updated policy will be posted to the Website.

How to Contact Us

If you have any questions or concerns about this California Privacy Notice, please contact us at privacy@brandes.com.