

## PRIVACY POLICY AND NOTICE OF FIRST TRUST PORTFOLIOS L.P. AND FIRST TRUST ADVISORS L.P. (“FIRST TRUST”) FOR CALIFORNIA RESIDENTS

First Trust values our relationship with you and considers your privacy an important priority in maintaining that relationship. We are committed to protecting the security and confidentiality of your personal information.

This Privacy Policy and Notice for California Residents supplements the information contained in First Trust’s Privacy Policy and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this policy to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the CPRA) and any terms defined in the CPRA have the same meaning when used in this policy.

### Information We Collect

First Trust collects information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual as part of the gathering of information to provide services to certain First Trust clients, its pre-qualification of job applicants, ongoing maintenance of necessary employee information and the provision of access to certain information on our website by financial intermediaries (“personal information”). In particular, First Trust has collected the following categories of personal information from its employees, job applicants and financial intermediaries within the last twelve (12) months:

Category	Collected	Retention Period	Sold or Shared
A. Personal Identifiers.	YES	7 years or as required by applicable law, whichever is longer	Shared
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	YES	7 years or as required by applicable law, whichever is longer	Shared
C. Protected personal classification characteristics under California or federal law.	YES	7 years or as required by applicable law, whichever is longer	Shared
D. Personal Commercial information.	YES	7 years or as required by applicable law, whichever is longer	Shared
E. Biometric information.	NO	N/A	N/A

F. Personal Internet or other similar network activity.	YES	7 years or as required by applicable law, whichever is longer	Shared
G. Personal Geolocation data.	YES	7 years or as required by applicable law, whichever is longer	Shared
H. Sensory data.	NO	N/A	N/A
I. Professional or personal employment-related information.	YES	7 years or as required by applicable law, whichever is longer	Shared
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	NO	N/A	N/A
K. Inferences drawn from other personal information.	NO	N/A	N/A

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CPRA's scope, such as personal information covered by certain sector-specific privacy laws, including the Gramm-Leach-Bliley Act (GLBA).

In addition, the CPRA also requires us to disclose whether we collected certain sensitive personal information in the last twelve (12) months:

Category	Collected	Retention Period	Sold or Shared
L. personal Government identifiers (social security, driver's license, state identification card, or passport number)	YES	For term of employment plus any additional period required by law	Shared
M. Complete personal account access credentials (user names, account numbers, or card numbers combined with required access/security code or password).	YES	For term of employment plus any additional period required by law	Shared
N. Precise geolocation.	NO	N/A	N/A
O. Racial or ethnic origin.	NO	N/A	N/A
P. Religious or philosophical beliefs.	NO	N/A	N/A
Q. Union membership.	NO	N/A	N/A
R. Genetic data.	NO	N/A	N/A
S. personal mail, email, or text messages contents.	YES	7 years or as required by applicable law, whichever is longer	Shared
T. Unique identifying biometric information.	NO	N/A	N/A
U. Health, sex life, or sexual	NO	N/A	N/A

orientation information.			
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Personal information that we collect without the purpose of inferring characteristics about you is not treated as sensitive personal information.

First Trust obtains the categories of personal information listed above from the following categories of sources:

- Directly from you—For example, from forms you complete.
- Job board websites you may use to apply for a job with us.
- Employment agencies and recruiters.
- Your educational institutions.
- Online activity information that we and our service providers collect using server logs, “cookies” and similar technologies.
- Other First Trust personnel.

### Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information.
- To provide, support, personalize, and develop our Website, products, and services.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To deliver content on First Trust products.
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of First Trust’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by First Trust about our Website users is among the assets transferred.

First Trust 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.

### Selling and Sharing Personal Information

First Trust may disclose your personal information to a third-party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performance of the contract.

We send your personal information to the following categories of third-parties:

- Service providers.

### *Sharing of Personal Information for a Business Purpose*

In the preceding twelve (12) months, First Trust has disclosed the following categories of personal information for a business purpose:

Category A: Personal identifiers.

Category B: Personal information.

Category C: Protected personal classification characteristics under California or federal law.

Category D: Personal commercial information.

Category F: Personal internet or other similar network activity.

Category G: Personal geolocation data.

Category I: Professional or personal employment-related information.

Category L: Personal government identifiers (social security driver's license, state identification card or passport number).

Category M: Complete personal account access credentials (user names, account numbers, or card numbers combined with required access/security code or password).

Category S: Personal mail, email or text messages contents.

We disclose your personal information for a business purpose to the following categories of third-parties:

- Service providers.

### *Sharing of Personal Information for Cross-Context Behavioral Advertising*

In the preceding twelve (12) months, First Trust has not shared personal information for the purpose of cross-context behavioral advertising. To the extent that First Trust ever changed its policy and chose to share information for cross-context behavioral advertising, you would have the right to opt-out of the sharing of your personal information for such purpose.

### *Sales of Personal Information*

In the preceding twelve (12) months, First Trust has not sold personal information.

To the extent that First Trust ever changed its policy and chose to sell personal information, you would have the right to opt-out of the sale of your personal information.

## **Your Rights and Choices**

The CPRA provides California consumers with specific rights regarding their personal information. This section describes your CPRA rights and explains how to exercise those rights.

### *Access to Specific Information and Data Portability Rights*

You have the right to request that First Trust disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.

- The categories of third-parties with whom we share that personal information.
- The specific pieces of personal information we collected about you.
- If we disclosed your personal information for a business purpose, two separate lists disclosing:
  - Disclosures for a business purpose—identifying the personal information categories that each category of recipient obtained.

#### *Deletion Request Rights*

You have the right to request that First Trust delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, Deletion, Correction and Use Limit Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies. We will also pass deletion requests on to service providers, contractors, and, unless impossible or involving disproportionate effort, to all third parties to whom the business sold or shared the information, if any.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

- Complete the transaction for which we collected the personal information, provide a good 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 et. seq.).
- 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.

#### *Right to Correct*

You have the right to request that we correct any inaccuracies in the personal information we hold about you. If you make such a request, we are obligated to use commercially reasonable efforts to correct any identified inaccurate personal information.

#### *Right to Limit Use and Disclosure of Sensitive Personal Information*

If we disclose sensitive personal information for reasons other than those set forth in the CPRA, you have the right to limit the use or disclosure of sensitive personal information by us to only those purposes specifically permitted by the CPRA. This includes Social Security, driver's license, state identification card and passport numbers; account log-in, financial account, debit card, and credit card numbers in combination with credentials allowing access to an account; geolocation; information relating to your health; and biometric information.

#### *Exercising Access, Data Portability, Deletion, Correction and Use Limit Rights*

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

Calling us at toll free at 1-800-621-1675

[CLICK HERE](#) to Submit an Email

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

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 about whom we collected personal information or an authorized representative.
- 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.

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 forty-five (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.

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 not to receive discriminatory treatment for exercising any of your CPRA rights. Unless permitted by the CPRA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.
- Retaliating against an employee, applicant for employment, or independent contractor for exercising their rights under the CPRA.

## **Other California Privacy Rights**

Websites operated by First Trust currently do not respond to “do not track” signals or similar mechanisms. California’s “Shine the Light” law (Civil Code Section § 1798.83) permits users of our Website that are California residents to request certain information regarding our disclosure of personal information to third-parties for their direct marketing purposes. First Trust does not disclose personal information to third-parties for direct marketing purposes.

## **Changes to Our Privacy Policy**

First Trust reserves the right to amend this privacy policy at our discretion and at any time. When we make changes to this privacy policy, we will post the updated policy on the Website and update the policy’s effective date. Your continued use of our Website following the posting of changes constitutes your acceptance of such changes.

## **Contact Information**

If you have any questions or comments about this policy, the ways in which First Trust collects and uses your information described below and in our general Privacy Policy, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 1-800-621-1675 or 1-800-222-6822

Website: [www.ftportfolios.com](http://www.ftportfolios.com)

[CLICK HERE](#) to Submit an Email

Postal Address: 120 E. Liberty Drive, Wheaton Illinois 60187

Effective Date: 4/03/2023