

Privacy Statement

December 2025

This privacy statement applies to the processing by Aegon USA Investment Management, LLC and Aegon USA Realty Advisors, LLC (collectively, “we” or “the Companies”) of personal data of its clients, customers and potential customers, suppliers/vendors, and business partners as well as visitors of our websites.

Protecting your personal data

The Companies understand that protecting and respecting the privacy of personal data is important. Our aim is to be transparent about how we deal with personal data. This privacy statement details how the Companies, and other entities in Aegon Asset Management, appointed suppliers and other companies within the Aegon Group process your personal data.

More information on these processing activities can be found below.

Controller for the processing of your personal data

The Companies are the controller or co- or joint controller, of all personal data within the scope of this privacy statement. The Companies, which have their registered office in Cedar Rapids, IA, USA, are part of Aegon Asset Management, the asset management arm of the Aegon Group, a global life insurance, pensions and asset management company.

Contact us

If you have any questions about this privacy statement or information we collect/process about you, please contact Client Services or our [Data Protection Office](#).

Aegon USA Investment Management, LLC [or] Aegon USA Realty Advisors, LLC
Attn. US Data Protection Officer
6300 C Street SW
Cedar Rapids, IA 52499

E-mail [Data Protection Office](#)

You may contact the Data Privacy Officer directly using this email address.

More information on your rights as a data subject is set out below under ‘Your Rights’

Purposes for processing personal data

The most common activities we conduct that involve collecting and processing of personal data include:

- Conducting due diligence reviews and assessments prior to establishing, and during the course of, business relationships
- Performing services we have agreed to provide
- Servicing, and managing relationships with, existing and prospective customers, clients and investors
- To develop and improve our products and services

- Managing relationships with third parties that support our business (e.g., vendors, suppliers, service providers)
- Internal management reporting and support functions
- Managing relationships with governments, regulators and supervisory authorities, and complying with legal and regulatory obligations
- Marketing to existing and prospective customers, clients and investors
- Operating and managing our channels of communication, such as our website (for example, through the use of Cookies)

More information on these processing activities is contained below

How and what personal data we obtain about you

You or someone representing you (for example a financial advisor, an employer or the business you work for) may give us information about you by completing forms (paper versions or through a website), concluding contractual arrangements or by contacting us by phone, post, email or otherwise. We may also receive your personal information from a third party where they have obtained your consent or have another valid legal basis to share such information.

For the processing activities described below, personal data that is collected and processed may include:

- Full name
- Title
- Job role/description
- Address including zip code
- Phone number
- E-mail address (personal and/or business)
- Website username and password
- IP Address
- Date of birth
- Gender
- Aegon account number or other Aegon identifier, whether for internal or external use
- Taxpayer identification number
- Cookie information collected when you visit one of our websites. Further information is available in our website Cookie Statement and SEISMIC Cookie and Tracking Statement.

Where sensitive personal data is collected and processed as part of any of the activities below, this will be stated in the relevant processing descriptions. Sensitive personal data processed may include the following:

- Copy of identification document (e.g. passport or ID card)
- Social security number
- Driver's License Number
- Passport number
- Bank account details

When collecting and processing personal data, the Companies strive to process the minimum amount of personal data relevant to the specific purpose it is collected for and to only use the data for the original

purpose for which it was collected (stated below) or a further purpose which you have consented to or that is compatible with the original purpose for which it was collected and that is likely to be in line with your expectations regarding the processing of that data.

If we do not receive all the required personal data, we might not be able to fully meet our processing needs, including regulatory requirements, and therefore may not be able to provide our full range of products and services.

Common purposes for processing:

Conducting due diligence reviews and assessments prior to establishing, during the course of, business relationships

This includes anti-money laundering, sanctions and politically exposed persons (“PEP”) reviews. This processing is conducted to detect and prevent financial crime and help us meet our legal and regulatory obligations. In the event of other checks these will be conducted to execute an agreement. We conduct these reviews with the assistance of a third-party which compares personal data against various official sanctions and PEP lists. The results of these reviews will be considered by a member of our staff in determining whether to conduct business with or provide a service to a person or company.

This processing may include collecting (sensitive) personal data including copies of identification documents and providing or disclosing such data to other entities within Aegon Asset Management, the Aegon group of companies and appointed suppliers and their appropriate affiliates. Personal data may also be provided or disclosed to supervisory/regulatory or other governmental authorities in certain circumstances.

Performing services we have agreed to provide

This includes processing your instructions and account transactions, settling those transactions, assessing investments and markets, administering external investment managers, managing investment portfolios, monitoring investment portfolios and managing risks associated with an account or product, including areas of regulatory compliance. This processing is imperative to us providing the requested service and executing the agreement between us.

Servicing, and managing relationships with, existing and prospective, customers, clients and investors

This includes managing and administering existing and prospective customer, client and investor relationships, handling queries and complaints, managing any incidents/issues encountered, providing account reporting, detecting fraud, and providing online services including our websites. This processing is required for us to provide the service agreed under our agreement and ensure the integrity of any account you have with us. Some of the processing will be based on a legal obligation. These relationships may be maintained by phone, mail, e-mail, personal contact and fax where appropriate (see the section below titled ‘Communicating with us’).

Developing and improving our products and services

This includes reviewing our existing offering of products and services, making required improvements and launching new products/services. Personal data may also be processed when we develop our appropriate business strategies and systems internally. Where these processes include personal information, they are conducted in our legitimate interest to ensure we provide the best products and services for our customers. We are committed to ensuring that the impact to the data subjects involved is minimal, the approach adopted is reasonable and that the least intrusive approach is followed.

The data may be shared provided or disclosed to entities within the Aegon Group. More information can be found in the section titled 'Disclosing your personal data'.

Managing relationships with third-parties that support our business (e.g., vendors, suppliers, service providers)

Personal data will be processed in order to assess, obtain, and use services provided by third-party companies, to manage our relationships with those companies (including where they act as our data processor) and reporting and performance analysis on these relationships. These processes may also require providing or disclosing personal data to other entities within the Aegon group of companies as well as consulting publicly available records. These processes are conducted to ensure appropriate execution of the agreement between the parties and between us and our customers, as well as being in our legitimate interests to be able to utilise third-party services when providing its products and services to customers in the best way possible.

Where appropriate, these processes may include the use of any sensitive data provided on copies of identification documents.

More information can be found in the section titled 'Disclosing your personal data'.

Internal management reporting and support functions

This includes the provision of legal and regulatory support and advice (both internal and external), internal auditing, strategy development and providing and maintaining IT solutions, risk control, and other operational matters. This also includes processing required to effectively manage data including scanning, classification and labelling. Most of these processes are conducted to execute activities vital to the internal management of our business and are imperative to the performance of our agreements with clients, customers and suppliers, however some will be conducted in order to meet our legitimate interests as a company. Where this is the case, we are committed to ensuring that the impact to the data subjects involved is minimal, the approach adopted is reasonable and that the least intrusive approach is followed. Other processing may be conducted to fulfil a legal or regulatory obligation. Personal data may be provided or disclosed to other entities within the Aegon Group, including (Aegon) Enterprise Technology (ET) who act as a data processor of personal data handled or processed when providing IT and technology solutions. Personal data may also be provided or disclosed to third parties including external law firms, accountants, technology providers and auditors.

More information can be found in the section titled 'Disclosing your personal data'.

Managing relationships with governments, regulators and supervisory authorities, and complying with legal and regulatory obligations

This includes responding to requests and providing regular and ad hoc reporting. These processes are conducted to fulfil a legal and regulatory obligation of the company. Where personal data, including sensitive personal data, needs to be processed in order to fulfil these obligations it will be conducted in line with this privacy statement including when processing involves third parties and entities within Aegon Asset Management, appointed suppliers and the Aegon Group.

More information can be found in the section titled 'Disclosing your personal data'.

Marketing to existing and prospective customers, clients and investors

This includes execution and analysis of marketing campaigns, surveys and strategies, promoting products and services provided by AIM and affiliated Aegon Asset Management companies, running and contributing to promotional events and the use of ad hoc competitions and promotions.

We may use personal data to send you marketing information and news about our products and services that may be of interest to you, unless you have opted out of marketing.

We may conduct marketing with our customers (including business partners) based on our legitimate interest to share product and service information with them for them to take it into account when providing a related service. When doing this we will ensure that the least intrusive method is used and that we feel the recipient would reasonably expect to receive marketing of this type. Business partners will be able to opt out of marketing from us at any point and this will be respected.

Marketing communications will be conducted using various channels such as mail, phone and email.

When running or contributing to promotional events we may need to collect personal information in relation dietary and access needs, but this information will only be used for the purposes confirmed at the time of collection.

We may conduct marketing related analytics which includes the processing of personal data based on our legitimate interest to ensure we provide customers with appropriate marketing information that is relevant to them. When doing this we will ensure that aggregated information is used where possible and where personal data is processed the least intrusive method is used and that we feel the recipient would reasonably expect this type of processing. Data subjects may object to this at any time by contacting us. These analytics may include additional (personal) information obtained from third parties where we consider the use of this data fair and legal.

You can withdraw your consent or request to opt-out of marketing communications at any time by contacting us (see section 'Your Rights'). The withdrawal of consent, or your objection to the specific processing of personal data, including for the purposes of marketing, does not affect the processing conducted before the withdrawal. It will also not affect the provision of other products and services unrelated to the process for which you have withdrawn consent.

Operating and managing our channels of communication, such as our website (for example, through the use of Cookies)

We also collect information using cookies and other website tracking technologies. Cookies are small files which save and retrieve information about your visit(s) to our websites – for example, your computer and browser details, how you entered our site(s), how you navigated through the site(s), and what information you accessed.

Read more about how we use cookies in our website [Cookie Statement](#) and [SEISMIC Cookie and Tracking Statement](#).

Communicating with us

In order to conduct the processing activities described in this statement and allow us to verify the content of calls, telephone lines are recorded whenever you contact or are contacted by certain members of our investment and portfolio management teams or trading teams. This will be conducted using the same legal basis as confirmed for the specific processing activity unless stated otherwise.

All emails, SMS/MMS, and other electronic communications sent to or from any member of our staff will be retained and may be monitored to complete the respective processing activities or achieve the processing purposes stated in this statement. Only the appropriate staff members are authorized to monitor or review email or message content in line with their job role.

Disclosing your personal data:

Disclosing your personal data within the Aegon Group

As a global organization, personal data we collect may be transferred internationally throughout Aegon's worldwide organization. Your personal data may be exchanged between each of the Companies as well as within the Aegon Group (meaning all subsidiaries and affiliates of Aegon Ltd.), including the other companies in Aegon Asset Management group (the entities within the Aegon Group that are responsible for asset management activities) including Aegon Asset Management UK plc, Aegon Investment Management B.V., Aegon Asset Management (Asia) Limited, and Aegon Asset Management Hungary B.V.

We provide or disclose your personal data to others for the purposes mentioned above and to have a complete overview of our contacts and contracts within the Aegon Group. We may also provide or disclose your personal data to others to offer you a complete package of services and products. This will be handled in line with the description above on how we provide marketing to customers and prospects. Providing or disclosing personal data within the Aegon Group is done in line with applicable regulatory requirements, including appropriate technical and organizational measures.

Our employees are authorized to access personal data only to the extent necessary to serve the mentioned above and to perform their job.

Disclosing your personal data to third parties

In connection with the operation of our business, we work with a variety of third parties. The following types of third parties have or could be granted access to your personal data where relevant for the processing described in this privacy statement.

- Governments
- Regulators and supervisory authorities – including, but not limited to, the US Securities & Exchange Commission (SEC), and various state regulators
- Administrative bodies
- Banks
- Affiliated and unaffiliated technology suppliers – including (Aegon) Enterprise Technology (ET), Microsoft and Amazon Web Services (AWS), Snowflake, OneTrust and SEISMIC
- Client Relationship Management (CRM) tool providers – including Salesforce
- Accountants
- Auditors
- Consultants
- Advisors
- Third-party service providers, including fund administrators
- External legal counsel
- Judicial bodies

When third parties are given access to your personal data, we will implement such contractual, technical and organizational measures as may be legally required to ensure that your personal data is processed by such third parties in accordance with applicable law and only to the extent necessary to achieve the purposes for which the data has been disclosed.

In other cases, your personal data will not be supplied to third parties, except:

- to the extent that we are required to do so by law, by a government body or by a law enforcement agency, or for crime prevention purposes (including financial crime protection and credit risk reduction);
- when protecting your interests or the interests of other individuals or for reasons of substantial public interest;
- in connection with any legal proceedings (including prospective legal proceedings);
- in order to establish or defend our legal rights;
- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets and for the purposes of effecting any sale or purchase; or
- if we, or substantially all of our assets, are acquired by a third party, we may disclose your personal data to that third party in connection with the acquisition.

The use of personal data by data processors

When a third party processes your personal data solely following our instructions, it acts as a data processor. We enter into an agreement (DPA) with such a data processor concerning the processing of personal data. In this DPA we include obligations to safeguard that your personal data is solely provided to the data processor to provide specific services to us and the data is afforded a sufficient level of protection.

Retention of personal data

We will keep your personal data following the conclusion of our relationship and/or the processes mentioned above. This is to ensure that we comply with our record retention obligations, as set out in our internal record retention policy and determined by the appropriate supervisory and governmental authorities (including financial regulators) or other regulatory and legislative requirements. Any personal data retained after the conclusion of the relationship will be kept confidential and we will not use the information for any purpose other than to meet our legal obligations.

Each of the Companies is a U.S. Registered Investment Adviser, required to maintain certain books and records pursuant to Rule 204-2 of the Investment Advisers Act of 1940. We regularly review the applicable record retention obligations to ensure we keep personal data for the minimum time we are legally obliged to and delete information that is no longer required to be kept.

Security

We implement functional, technical, physical and organizational measures to protect the personal data that we have under our control from:

- Unauthorized access and alteration;
- Improper disclosure; and
Accidental or unlawful destruction or loss.

We implement information security policies, conduct staff training and strive to ensure the security of our information technology and the personal data under our control. Employees and service providers who have access to personal data under our control are obliged to protect it and keep it confidential, except as otherwise agreed by us in accordance with applicable laws and regulations.

Of course, no network or system (including the internet) is entirely secure, and despite the measures described above, we cannot guarantee the security of networks and systems we operate or use, or that are operated on our behalf or that are used by third parties with whom we have relationships (such as clients, customers, investors, vendors, suppliers, service providers and governmental authorities), including the security of email and other electronic transmissions of data.

Your rights

You have a number of rights with respect to personal data about you that we collect and process, including:

- the right to request a copy of the personal data we hold on you. (Requesting this information is known as making a Data Subject Access Request (DSAR). In most cases, this will be free of charge, however in some limited circumstances, for example, repeated requests for further copies, we may apply an administration fee);
- the right to have inaccurate personal data corrected;
- the right to have out of date personal data deleted once there is no business need or legal requirement for us to hold it;
- the right to object to or restrict some processing, in limited circumstances and only when we do not have legitimate grounds to continue processing your personal data;
- the right to object to your personal data being used to send you marketing material. As mentioned above, generally we will only send you marketing material where you have given us your consent to do so or where we believe there is a legitimate reason for doing so. You can withdraw your consent at any time;
- the right to have personal data that you provided us with transferred to another service provider in electronic form in certain scenarios; and
- the right to ask for a decision to be made manually, where a decision is made by automated means, and this adversely impacts you.

To exercise any of these rights, please contact our Data Protection Office.

While we will strive to honor requests you may make to exercise your rights, in considering each request we must take into account other conflicting obligations we may have as well as the rights of other data subjects. As a result, there is a chance that your request may be only partially fulfilled or in limited circumstances it may be rejected completely. If this happens, an explanation will be provided to you.

If you wish to exercise your rights in relation to the processing of your personal data conducted by one of our processors or associated co-controllers then please contact us in the first instance.

Your California Privacy Rights

If you are a California resident, please refer to our [California Consumer Privacy Act Disclosure & Statement of Rights](#) for more privacy-related disclosures and additional information about your privacy rights and our privacy practices.

Children

Through this website, we do not purposefully market any products or services to, or knowingly gather or solicit data from, children under thirteen (13) years of age. By using this Site, you represent that you are

not under thirteen (13) years of age. If you are under the age of thirteen (13), please do not transmit to us any of your personal data.

Making a complaint

If you believe we have not processed your personal data in accordance with our data protection obligations, and that you have been affected by our non-compliance, you can make a complaint to us by contacting our Data Protection Office via information provided in “Contact us”.

Changes to this privacy statement

From time to time, we may make changes to this privacy statement. If we make any changes to this privacy statement and the way in which we use your personal data, we will post these changes on this page and where the changes are significant, we will do our best to notify you.

This privacy statement was last updated in December 2025.