

MFS® Online Privacy Notice: United States

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Privacy is a concern for every investor today. At MFS Investment Management®, its subsidiaries, and the MFS® funds (together “MFS”, “we”, “our”, “us”) we take this concern very seriously. We are committed to safeguarding the privacy and confidentiality of your personal information or personal data (“Personal Information”) you have entrusted to us.

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1. What is covered by this Privacy Notice?

This MFS® Online Privacy Notice (“Notice”) applies to our privacy practices for the handling and processing of your Personal information when you use the MFS.com website, including MFS Access, when you interact with us by phone, email or in-person, or when you visit one of our offices. This Notice will also explain our purposes for using your Personal Information, how we protect it, and your rights you may have under applicable U.S. privacy and data protection laws, including the California Consumer Privacy Act of 2018 (“CCPA”).

For purposes of this Notice, Personal Information means any information about an identifiable natural person, such as yourself, that can be used to identify that person, directly or indirectly.

This Notice **does not** apply to Personal Information relating to MFS employees, job applicants, and contractors in the context of employment.

2. What Personal Information do we collect?

Depending on the product or service that we provide to you, we may collect and process Personal Information about you, including:

- **Information you provide to us** ► information that you provide to us (including your name, email address, other contact details, user name, password, and the entity with which you are affiliated, if applicable), such as when you engage with the MFS.com website, call or email us, provide a business card to an MFS employee, or interact with MFS in a business relationship or potential business relationship;
- **Information about you provided to us by others** ► information about you (including your name and business contact information) that is made available to us by others, such as when you are identified as a contact person by an entity with which we do business, or when we obtain details about you from a resource such as LinkedIn, your company's website, or a business intelligence resource;
- **Anti-Crime and Fraud Information** ► information relating to any criminal or fraudulent activities or suspicious transactions provided to us by you or third parties, including information which establishes your identity (such as driving licenses and passports); and politically exposed person and sanctions lists where your details may be included;
- **Financial Information** ► information provided to us by you or a third party (such as your broker or financial advisor or the transfer agent for a fund you are invested in) to enable us to provide services to you, to enter into a business relationship with you or an entity with which you are affiliated, or to satisfy legal or regulatory requirements;
- **Your transactions and holdings** ► details of transactions or holdings in MFS-managed financial products that you have made or initiated;
- **Our correspondence** ► if you contact us, we will typically keep a record of that correspondence;
- **Device Information** ► such as information about your operating system, browser, software applications, IP address, geolocation, security status and other device information in order to improve your experience, protect against fraud, and manage risk;
- **Website and communication usage** ► details of your visits to the websites and information collected through cookies, entry links, and other tracking technologies including, but not limited to, your IP address and domain name, your browser version and operating system, traffic data,

location data, web logs, entry links, and other communication data, and the resources that you access;

- **Marketing preference information ►** details of your marketing preferences (e.g. communication preferences) and information relevant to selecting appropriate products and services to offer you;
- **Email tracking information ►** Our emails may contain a single, campaign-unique “web beacon pixel” to tell us whether our emails are opened and combined with other technology to verify any clicks through to links within the email. We may use this information for purposes including determining which of our emails are more interesting to you and to query whether users who do not open our emails wish to continue receiving them. The pixel will be deleted when you delete the email. If you do not wish the pixel to be downloaded to your device, you should select to receive emails from us in plain text rather than HTML, choose not to click links that we send you or unsubscribe from the receipt of our emails;
- **Call recordings and CCTV ►** We may monitor or record incoming or outgoing telephone calls of our Investment Personnel in order to comply with regulatory requirements. We may record CCTV footage in and around our premises for the safety of our clients and employees, and to protect against theft, property damage and fraud; and
- **Survey information ►** we may also ask you to complete surveys that we use for research purposes. In such circumstances we shall collect the information provided in the completed survey.

The Personal Information that you provide to us is voluntary; however, if you do not provide the Personal Information requested, we may not be able to provide our services or products to you.

3. What are our purposes for using your Personal Information?

We will process your Personal Information only to the extent there is a lawful reason for us to do so. When we collect your Personal Information, we may use or disclose it for the following purposes:

- **To provide and manage products and services to you or an entity with which you are affiliated ►** to administer our services, including to carry out our obligations arising from any agreements entered into between you and us, or to notify you about changes to our services and products.
- **To verify your identity, protect against fraud, and manage risk ►** we and other organizations may access and use certain information to prevent fraud, money laundering, and terrorism, as may be required by applicable law and regulation and best practice at any given time, including checking against sanctions lists, politically exposed persons (PEP) lists, and other fraud or crime screening databases. If false or inaccurate information is provided and fraud is identified or suspected, details may be passed to fraud prevention agencies and may be recorded by us or by them.

- **To comply with legal or regulatory requirements, or as otherwise permitted by law** ► we may process your Personal Information to comply with our regulatory requirements, dialogue with our regulators or defend or prosecute claims as applicable which may include disclosing your Personal Information to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings, or investigations by such parties anywhere in the world. Where permitted, we will direct any such request to you or notify you before responding unless to do so would prejudice the prevention or detection of a crime.
- **To monitor certain activities** ► to monitor queries and transactions to ensure service quality, compliance with procedures, and to combat fraud.
- **To inform you of changes** ► to notify you about changes to our services and products.
- **To communicate with you regarding products and services that may be of interest** ► to provide you with updates and information. We may also use your information for marketing our products and services to you by post, email, phone, online or social media advertisement. Where required by law, we will ask for your consent at the time we collect your data to conduct any of these types of marketing. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing communication sent to you or you may opt out by visiting the [Contact Us](#) section below.
- **To understand our customers and to develop and tailor our products and services** ► we may analyze the Personal Information we hold in order to better understand our clients' services and marketing requirements, to better understand our business, and develop our products and services. In order to ensure that content from our website is presented in the most effective manner for you and for your device, we may pass your data to business partners, suppliers and/or service providers.
- **To reorganize or make changes to our business** ► in the event that we (i) are subject to negotiations for the sale of our business or part thereof to a third party, (ii) are sold to a third party or (iii) undergo a reorganization, we may need to transfer some or all of your Personal Information to the relevant third party (or its advisors) as part of any due diligence process for the purpose of analyzing any proposed sale or reorganization. We may also need to transfer your Personal Information to that reorganized entity or third party after the sale or reorganization for them to use for the same purposes as set out in this Notice.
- **To communicate effectively with you in the course of business** ► to conduct our business, including to respond to your queries, to otherwise communicate with you, or to carry out our obligations arising from any agreements entered into between you and us.

4. Disclosing Your Personal Information

We will only use or disclose your Personal Information for the purpose(s) it was collected and as otherwise identified in this Privacy Notice.

Outside MFS entities: Personal Information may be provided to third parties, including antifraud organizations, legal, regulatory or law enforcement authorities in cases of suspected criminal activity or contravention of law, for the detection and prevention of fraud, or when required to satisfy the legal or regulatory requirements of governments, regulatory authorities or other self-regulatory organizations, or to comply with a court order.

Within MFS entities: We may share your Personal Information among MFS entities for marketing purposes, for legal and regulatory purposes, to manage risks, to perform analytics, to ensure we have correct or up to date information about you (such as your current address or date of birth) and to better manage your relationship with us.

Business sale or reorganization: Over time, we may buy new businesses or sell some of our businesses. Accordingly, Personal Information associated with any accounts, products or services of the business being purchased or sold will be reviewed as part of the due diligence process and subsequently transferred as a business asset to the new business owner. We may also transfer Personal Information as part of a corporate reorganization or other change in corporate control.

Contractors and agents: We may use affiliates or other companies to provide services on our behalf such as data processing, account administration, fraud prevention and detection, analytics and marketing. Such companies will be given only the Personal Information needed to perform those services and we do not authorize them to use or disclose Personal Information for their own marketing or other purposes. We have contracts in place holding these companies to the same standards of confidentiality by which we are governed.

5. Links to Third-Party Websites

The MFS.com website may contain links to other third-party websites that are not affiliated with or maintained by MFS. MFS does not monitor the privacy practices of these third-party websites, does not exercise any authority over the sites and specifically, does not control the use of "cookies" on third party websites. As a result, MFS does not assume any responsibility for the content or data-collection policies and procedures of these websites. When you access any of these third-party sites, MFS cannot guarantee that your privacy will be protected in the same way it is on the MFS website.

6. No Sale or Sharing of Personal Information

We do not sell or share your Personal Information to third parties, as defined by the CCPA and described within our [California Consumer Privacy Policy](#). We take measures to ensure that Personal Information is not disclosed to unauthorized third parties.

7. Retention of your Personal Information

Our retention periods for Personal Information are based on business needs and legal requirements. We retain your Personal Information for as long as is necessary for the processing purpose(s) for which the information was collected, and any other permissible, related purpose. For example, we may retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, or to comply with regulatory requirements regarding the retention of such data. When Personal Information is no longer needed, we either irreversibly anonymize the data (and we may further retain and use the anonymized information) or securely destroy the data.

8. Maintaining the accuracy of your Personal Information

We are committed to maintaining the accuracy of your Personal Information and ensuring that it is complete and up to date. If you discover inaccuracies in our records, or your Personal Information changes, please notify us immediately so that we can make the necessary changes. Failure to notify us of changes to your Personal Information may negatively impact the way we communicate or provide services to you. Where appropriate, we will advise others of any material amendments to your Personal Information that we may have released to them. If we do not agree to make the amendments that you request, you may challenge our decision as described in the [Contact Us](#) section below.

9. Safeguarding your Personal Information

In our commitment to securing your Personal Information, we use physical, electronic, and procedural safeguards to protect against unauthorized use, access, modification, destruction, disclosure, loss or theft of your Personal Information in our custody or control.

We have agreements and controls in place with our third-party service providers requiring that any Personal Information we provide to them must be safeguarded and used only for the purpose of providing the service we have requested the service provider to perform.

a. Accountability

We have strict policies and procedures governing how we deal with your Personal Information. Each and every one of our employees is responsible for respecting and protecting the Personal Information to which the employee has access.

Our compliance team oversees privacy governance including policy, dispute resolution, education, communications activities, and internal reporting on privacy matters. If you have any questions or concerns regarding this Notice, or how we process your Personal Information, please see the [Contact Us](#) section below for information on how to reach us.

b. Security over the internet

No data transmission over the Internet or website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic, and procedural safeguards to protect your personal information in accordance with data protection legislative requirements.

All information you provide to us is stored on our or our contractors' secure servers and accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share your password with anyone.

10. Privacy of Minors

The MFS.com website and MFS' business and marketing activities are not directed, or intended for use, by minors under the age of 16 years old or as defined by applicable laws or regulations.

11. Your Privacy Rights: California

If you are a California resident, please see our California Consumer Privacy Policy for further explanation about your rights under the CCPA and how to exercise your rights.

12. Cookies and Online Tracking

We use cookies and other online tracking technologies on the MFS.com website. Please see our [Cookies Policy](#) for more information.

13. MFS Funds Privacy Policy

If you are an investor in the MFS Funds, please read the [MFS Funds Privacy Policy](#) for specific details relating to what MFS does with your Personal Information. If applicable, as disclosed in the product disclosure statements of certain MFS funds, investors in such funds should be aware that Personal Information may be disclosed by the funds' transfer agent: (i) to MFS or any of its affiliates or agents and to other third party service providers of the funds, which may be based in countries where privacy laws do not exist or provide less protection than the laws where you reside; or (ii) when required by applicable law or regulation. By investing in such a fund, each investor appoints MFS or any of its affiliates or agents as attorney-in-fact to request and collect from the funds' transfer agent all necessary investor information.

Note: If you own MFS products or receive MFS services in the name of a third party such as a bank or broker/dealer, their privacy policy may apply to you instead of ours. In addition, for certain MFS funds, information provided by you or your financial intermediary to the funds' non-affiliated third-party service providers (e.g., the funds' transfer agent) would be subject to the privacy policies of the service provider.

14. Updates to This Privacy Notice

MFS may change this Notice at any time. Any updates to this Notice will be posted here and effective immediately upon posting. If we make any material changes to this Notice, we will post the revised Notice with an updated "Effective Date".

Please Contact Us to answer any questions you may have about this Notice.

15. Contact Us

If you have any questions or concerns about the privacy of your Personal Information or this Privacy Notice, please contact us via the following:

Attention: The Privacy Officer
Mail: MFS Investment Management, 111 Huntington Avenue, Boston, MA 02199, USA
Phone: 1-800-637-7747
Email: MFSPrivacyOffice@mfs.com