

Privacy Notice for California Residents



This Privacy Notice for California residents ("Notice") applies to individuals who reside in California ("California Consumers," "you," or "your"). TD Ameritrade, Inc. has adopted this Notice for its subsidiaries and related entities (collectively, "TD Ameritrade," "we," "our," or "us") whose activities fall within the scope of the California Consumer Privacy Act ("CCPA").

The CCPA does not apply to personal information we collect as part of our current or former client relationship with you pursuant to other privacy laws such as the federal Gramm-Leach-Bliley and Fair Credit Reporting Acts, and the California Financial Information Privacy Act. What we do with personal information of our clients governed by the Gramm-Leach-Bliley Act is set forth in The [TD Ameritrade Privacy Statement](#).

This notice does not apply to your relationship with TD Ameritrade, a subsidiary of The Charles Schwab Corporation ("Schwab"), as a current employee, contractor, or job applicant. Please refer to the privacy notices available on Schwab's intranet and on www.schwabjobs.com for information on the collection and processing of your personal information in these contexts.

Personal Information We Collect

The personal information we collect about California Consumers will depend on our relationships and interactions with you. We have collected the following categories of personal information about California Consumers within the last 12 months:

- Contact information such as name, postal address, email address, and telephone number
- Government-issued and similar identifiers such as Social Security, passport, and driver's license numbers
- Protected classification characteristics such as age, gender, and marital status
- Financial and commercial information such as investment background, interest, or experience, as well as purchasing or consuming histories or tendencies
- Information regarding interaction with our websites, applications and advertisements, IP addresses, device identifiers, browser information, browsing history, and server and application logs
- Geolocation information such as device location identified using your IP address
- Biometric information such as voiceprints for voice authentication
- Audio, video, and voice information such as call recordings, voicemails, and CCTV recordings
- Race and ethnicity information
- Inferences drawn from such information including for the creation of a summary about your preferences, behavior, and characteristics
- Personal information about business professionals associated with our business-to-business customers, suppliers, and partners in the context of our relationships with the companies with whom we do business

We may also collect or create account access information including usernames and account recovery information (such as your security questions and answers) when you establish an account with us for your application or if we issue you a temporary password.

Sources of Personal Information

We collect the categories of personal information listed above from the following categories of sources:

- Directly from you or from those acting on your behalf, for example, from forms you complete online or at events, or when you call us to request information about or obtain our products and services
- Automatically collected from Internet or other network activity regarding your interaction with our websites, applications, and advertisements
- Government entities from which public records are maintained and other publicly available sources
- Our affiliated entities and unaffiliated service providers, including those that may not be defined as such under the CCPA, such as those that provide personal information to support our business, products, services and operations, information security and fraud prevention, marketing including data resellers advertising networks, and consumer reporting agencies
- Third parties to whom you direct or authorize us to disclose your personal information, independent of or in connection with your relationship with TD Ameritrade



How We Use Your Information

We have used or disclosed personal information, including where applicable, sensitive personal information, collected for one or more of the following business purposes within the last 12 months (excluding uses or disclosures we may be prohibited from reporting under applicable law):

- To conduct our business and provide our products and services, including developing, supporting, managing, and improving our products and services, and, where necessary, to verify your identity
- To support our operations, including communicating with you, fulfilling your requests, addressing your inquiries and concerns, monitoring and improving our responses, and to carry out the purposes for which you provide your personal information
- To meet our legal and compliance obligations, including monitoring and reporting, supporting our information security and fraud prevention programs, performing due diligence, supporting audit, investigations, and legal requests, and complying with our internal policies, procedures, and contractual obligations
- For our marketing and promotional event services, including market data and research
- To personalize your experience with our business and to deliver content, product, and service offerings relevant to your interests, including targeted offers and ads through our websites and mobile applications, third-party sites, and via email or text message (with your consent, where required by law)
- To help maintain the safety, security, and integrity of our business, including our products and services, and to respond, where necessary, to requests from regulators and law enforcement or as otherwise required by applicable law, regulation, court order, or similar demand
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all TD Ameritrade's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by TD Ameritrade is among the assets or business operations transferred

Personal Information Disclosed for Business Purposes

We have disclosed the categories of personal information listed above for business purposes to the following categories of parties within the last 12 months (excluding disclosures we may be prohibited from reporting under applicable law):

- Our affiliated entities and unaffiliated service providers, including those that may not be defined as such under the CCPA, to help conduct our business such as providing our products and services, supporting our everyday operations, marketing, business development and management
- Government agencies to support our legal and regulatory requirements
- Third parties to whom you direct or authorize us to disclose your personal information, independent of or in connection with your relationship with TD Ameritrade
- Third party network advertising partners
- Our lawyers, auditors, and consultants

Personal Information Sold or Shared with Third Parties

TD Ameritrade does not sell your personal information in the usual sense of the word. That is, we do not give your information to third parties in exchange for money.

We use cookies to make our sites work like we believe you expect them to. We also use cookies to capture information about your device or browser. These cookies may be shared with certain providers for marketing purposes including influencing which kinds of ads you may see on other sites. Such sharing nonetheless may be considered a "sale" or "share" under the CCPA.

If we determine that you reside in California, you will see a "Do Not Sell or Share my Personal Information" link on the footer of our homepage. If you have ad blocking technology enabled, this functionality may not work as intended. To opt out of the sale or share of your personal information, click on the link and follow the prompts. Please note that by opting out, you may see more TD Ameritrade ads, or less relevant TD Ameritrade ads such as for products and services you may already have.

We do not knowingly sell or share personal information of consumers under 16 years of age.

Retention

We have established retention periods and requirements to retain the categories of Personal Information described above for as long as is necessary for our business and operational purposes such as audits and reporting, and for our legal and regulatory compliance obligations, such as books and records requirements and legal holds.

Your CCPA Data Rights

The CCPA provides California Consumers with certain data rights with respect to your personal information.

You have the following "Rights to Know":

1. The specific pieces of personal information we have collected about you
2. The categories of personal information we have collected about you
3. The categories of sources from which your personal information is collected
4. The categories of personal information that we have disclosed for a business purpose about you
5. The categories of third parties to whom personal information was disclosed for a business purpose
6. The business or commercial purpose for collecting, selling, or sharing personal information

Your CCPA Data Rights continued

You also have the right to:

7. Request that we correct inaccurate personal information that we maintain about you
8. Request that we delete personal information that we have collected from you (unless an exception applies, or deletion is otherwise restricted or prohibited by law, rule, or regulation)

Refer to the “Personal Information Sold or Shared with Third Parties” section above for information we may share and how you can limit that sharing.

Instructions for Submitting a CCPA Data Rights Request

You may exercise any of your data rights (subject to certain exceptions and limitations) by following the instructions below that apply to your relationship with TD Ameritrade.

Current and Former Employees, Contractors, and Job Applicants

To submit a CCPA data rights request in the context of your relationship with TD Ameritrade or Schwab as a current employee, contractor, or job applicant, please refer to the privacy notices available on Schwab’s intranet and on [schwabjobs.com](https://www.schwabjobs.com) for information on the collection and processing of your personal information in relation to your role with us.

If you are a former TD Ameritrade associate, you may submit a verifiable request to us by contacting Schwab’s Human Resources Help Desk by telephone at 800-725-3535 or by email, MyHR@Schwab.com.

All Other Requests

Submit your right to know (access) or deletion requests [here](#).

For any other California Consumer Privacy Act specific questions, please call us at 800-582-0387.

What to expect once you submit a request.

We will work to confirm receipt of your request within 10 business days (and provide you with information on how we will process your request, including our verification process) and to respond to your request within 45 calendar days from the date of our receipt of your request (unless additional time is necessary, and, in such cases, we will explain to you the reason it may take more than 45 calendar days to respond).

We may ask you to provide additional information to verify your identity. We will only use any additional information we collect for the purposes of verifying your identity and for security or fraud-prevention purposes. In cases where additional information is required and we are unable to contact you with the contact information you have provided or are otherwise unable to sufficiently verify your identity, we may be unable to respond to your request.

If your request covers the personal information of other individuals, including individuals with a shared address and device or service, we may be obligated to take additional steps to verify the request, including obtaining the consent of the other individuals whose personal information is covered by the request.

Authorized Agents

You can designate an authorized agent to make a data rights request under the CCPA on your behalf.

- **Who is an “authorized agent”?** An authorized agent is a person or a business entity that you have authorized to act on your behalf. If you are an authorized agent and submit a data rights request on behalf of a California Consumer, we may require that the California Consumer provide you with written authorization to make the request on their behalf and verify their own identity directly with us.
- **Authorized agents** acting on behalf of a California consumer can call us at 800-582-0387 to submit a data rights request.

Non-Discrimination

You have the right not to receive discriminatory treatment for exercising any of these data rights. TD Ameritrade does not discriminate or retaliate against any California Consumer for exercising their rights under the CCPA.

Questions

If you have questions or comments about this Notice or any of TD Ameritrade’s other privacy policies and practices, please call 800-326-7141 or go to www.tdameritrade.com/privacy-policies.html.

Information security and privacy is a partnership and a key aspect of our business. You can read about how we protect client accounts and information by visiting www.tdameritrade.com/security.html.

We recognize data privacy is an ongoing responsibility. We reserve the right to update or amend this Notice from time to time, and any such updates or amendments will be reflected in the Notice available on our website.