

Privacy Notice

FACTS	WHAT DO THE SAROFIM ADVISERS DO WITH YOUR PERSONAL INFORMATION?	
WHY?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
WHAT?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ▪ Social security number ▪ Income ▪ Assets ▪ Risk tolerance ▪ Wire transfer instructions ▪ Transaction history 	
HOW?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Sarofim chooses to share; and whether you can limit this sharing.	
Reasons we can share your personal information	Does Sarofim Share?	Can you limit this sharing?
For our everyday business purposes - such as to process your transactions, maintain your accounts(s) or respond to court orders and legal investigations.	Yes	No
For our marketing purposes - to offer our products and services to you	No	We don't share
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes - information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes – information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share
Questions?	Call your account executive or Mrs. Raye G. White at 713-654-4484	

Who we are	
Who is providing this notice?	Fayez Sarofim & Co. Sarofim International Management Company Sarofim Trust Co. Sarofim Realty Advisors LLC
What we do	
How does Sarofim protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Sarofim collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> Enter into an investment advisory contract Seek financial advice Make deposits or withdrawals from your account Tell us about your investment or retirement portfolio Give us your employment history <p>We also collect your personal information from others, such as affiliates or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes—information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <p><i>Sarofim does not share with our affiliates other than for such affiliates' everyday business purposes.</i></p>
Nonaffiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <p><i>Sarofim does not share with nonaffiliates so they can market to you.</i></p>
Joint Marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <p><i>Sarofim does not jointly market.</i></p>
Other important information	

Supplement for California Residents	
Who does this	To the extent that you are a resident of California, this section supplements the above Privacy Notice with respect to specific obligations and rights granted under the California Consumer Privacy Act of 2018 (the “CCPA”) as amended and expanded by the California Privacy Rights Act of 2020 (CPRA) to natural person California residents and provides information regarding how such California residents can exercise their rights under the CCPA/CPRA.
Why?	The CCPA/CPRA requires us to make certain additional disclosures and provides California residents with the ability to request additional information about their personal information.
Definitions	For the purposes of this supplement all terms used shall be understood to have the meanings assigned under the CCPA as amended and expanded by the CPRA.
Personal Information (PI)	“Personal information” or “PI” means information that identifies, relates to, describes, is <i>reasonably</i> capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Cal Civil Code Section 798140 (v)(1).
Selling and Sharing	Under the CPRA, “Sell,” “selling,” “sale,” or “sold,” means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a consumer’s personal information by the business to a third party for monetary or other valuable consideration. .”Cal Civil Code Section 798140 (ad)(1). Sharing is defined as the disclosure of personal information to third parties for purposes of “cross-context behavioral advertising.” Cal Civil Code Section 798.140 (ah)(1).
Collection, Use, and Disclosures of Personal Information	
Does Sarofim collect Sensitive Personal Information?	Subject to the relevant jurisdictional regulatory requirements, we may process sensitive personal information . Within the last twelve (12) months, we have collected and processed the following categories of sensitive personal information (SPI) : <ul style="list-style-type: none"> • A consumer’s social security, driver’s license, state identification card, or passport number; • A consumer’s account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; • A consumer’s racial or ethnic origin, religious or philosophical beliefs, or union membership; • The contents of a consumer’s mail, email, and text messages unless the business is the intended recipient of the communication. <p>We will only use and disclose sensitive personal information for a purpose for which it was originally collected. Unless we request it, we ask that you not send us, or disclose, any sensitive personal information.</p>
Does Sarofim Sell or Share my PI?	Sarofim does not sell or share your personal information or sensitive personal information and has not done so within the past twelve (12) months.
Does Sarofim Disclose my PI?	For business purposes, Sarofim may sometimes need to disclose personal information to third parties. The following table indicates the categories of personal information that Sarofim has collected and or disclosed within the past twelve (12) months.

Information Categories	Examples	Collected	Disclosed
A. Identifiers.	A real name, alias, postal address, unique personal identifier, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES	NO
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, education, employment, employment history, bank account number or any other financial information. Some personal information included in this category may overlap with other categories.	YES	NO
C. Protected classification characteristics under California or federal law.	Age, citizenship, marital status and gender	YES	NO
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES	NO
I. Professional or employment-related information.	Current or past job history	YES	NO
How long does Sarofim retain my Personal Information ?	<p>Sarofim will not keep Personal Data longer than is necessary for the purpose or purposes for which it was collected. It will take all reasonable steps to erase all Personal Information which is no longer required.</p> <p>Your PI will be retained only for as long as the information is needed to fulfill the purposes for which it was collected and processed. We reserve the right to retain and use your PI for as long as necessary to comply with our legal obligations and business requirements and/or to resolve ongoing disputes and enforce our agreements.</p>		
What are my rights under CCPA and the CPRA?	<p>If you are an individual who resides in California and whose Personal Information is collected and processed by Sarofim, you may have the right to:</p> <ul style="list-style-type: none"> • Request that we disclose to you, free of charge, the categories of the PI we collect, specific to you over the last twelve (12) months, including the categories of sources from which the PI was collected (and/or, if applicable, sold, shared or otherwise disclosed to a third party), and the business purpose for collecting PI. • Request the correction of any inaccurate Personal Information maintained by us about you. • Request that we limit the use of your Sensitive Personal Information. • Choose to opt-out of the sale of Personal Information. Currently, however, Sarofim does not sell personal information. • Request that we delete the PI we have collected. Following our verification of the request, we will comply with the request and delete any or all the PI in our possession that we collected from the California resident and/or any or all such PI in the possession of our service providers, unless otherwise restricted by law or regulation. 		
How can I exercise my rights?	<p>To exercise your rights, please contact us at RGWhite@sarofim.com or 800-288-7125. Prior to processing your request, we will attempt to verify your identity, taking into account the sensitivity of the personal information involved and the nature of the request. We may do this by requesting additional information from you. We will</p>		

	inform you if we are unable to verify your identity, in which case we will not be able to complete your request. Prior to processing your request, we will attempt to verify your identity, taking into account the sensitivity of the personal information involved and the nature of the request. We may do this by requesting additional information from you. We will inform you if we are unable to verify your identity, in which case we will not be able to complete your request.
Non-Discrimination for Exercising Your PI Rights	We follow the requirements of California Civil Code §1798.125 and will not discriminate against any consumer who exercises the rights set forth in this privacy policy.
Authorized Agent:	You have the right to appoint an authorized agent to exercise your rights on your behalf. If you would like to do so, please contact RGWhite@sarofim.com .
Questions or Concerns	If you have any questions or concerns regarding the information in this supplement to the privacy notice, please contact Mrs. Raye G. White at 713-654-4484
Other important information	