Dodge&Cox®

# **Privacy Notice**

This Privacy Notice describes how Dodge & Cox handles your personal information. The first section of this notice— Notice for California Residents—applies to California residents who are employees or other representatives of current or prospective institutional investors or clients. The second section of the notice—Financial Privacy Notice applies to current or prospective individual investors and clients who engage with Dodge & Cox in their personal or household capacity.

## **Notice for California Residents**

This notice applies only to California residents who are employees or other representatives of current or prospective institutional investors or clients, in accordance with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (the "CCPA").

#### **Personal Information We Collect**

We may collect the following categories of personal information:

- Identifiers, such as name, postal and residential address, and email address.
- Professional or employment-related information, such as corporate contact information and professional history.
- Information classified as personal or protected information by state or federal law, including nationality, and place and date of birth.
- Electronic or visual information, such as your signature.
- Sensitive personal information, including contents of mail or email, information concerning health, racial or ethnic origin, philosophical beliefs, or union membership that is shared with a Dodge & Cox representative, and account login or financial account number in combination with any access code, password, or account credentials.

We collect these categories of personal information either directly from you, from third parties acting on your behalf, or from financial advisors, consumer reporting agencies, consultants, or custodians.

#### How We Use Personal Information

We use personal information for the following purposes:

- **To provide our services**, including to assess and process investors' applications and administer investments in funds we manage, receive and make payments, communicate with investors as necessary in connection with their investments, and verify investors' or their representatives' identities in order to prevent fraud or other financial crime.
- To administer funds we manage, including to conduct audits, implement risk management processes, deploy corporate governance, provide tax documentation, maintain and monitor IT systems, and manage third party service providers.
- For marketing, including to contact you with information about other Dodge & Cox products or services that may be of interest to you.
- For compliance and protection, including to enforce our agreements, comply with legal obligations, defend against legal claims or disputes, protect the security and integrity of our services, and identify and investigate fraudulent, harmful, unauthorized, unethical, or illegal activity.

#### How We Disclose Personal Information

We do not sell or share personal information. We may disclose personal information to:

- Dodge & Cox affiliates, for purposes consistent with this Privacy Notice.
- Third party service providers that provide services on our behalf or help us operate our website (such as customer support, transfer agents, custodians, email delivery, marketing, identity verification, fraud detection, and database management).
- **Professional advisors**, such as lawyers, bankers, accountants, auditors, and insurers, where necessary in the course of the professional services that they render to us.
- Law enforcement, government authorities, and private parties, as required by law, legal process, or for the compliance and protection purposes described above.
- Other third parties to which you or your agents authorize or require us to disclose your information.

We may also disclose personal information in connection with any divestiture, merger, consolidation, acquisition, reorganization or sale of assets, or bankruptcy or dissolution in relation to our business.

#### **Retention of Personal Information**

We retain personal information as necessary to fulfil the purposes for which it was collected and processed, in accordance with our policies and with applicable laws, based on factors such as the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of personal information, and the purposes for which we use personal information.

#### **Personal Information Requests**

You have the right to request the following in relation to your personal information:

- Information about how we have collected and used your personal information. We have made this information available to you without having to request it by including it in this notice.
- Access to a copy of the personal information that we hold about you. Where applicable, we will provide the information in a portable, machine-readable, readily usable format.
- Correction of personal information that is inaccurate or out of date.
- Deletion of personal information that we no longer need to provide our online services or for other lawful purposes.

To make a request, please call us at 800-854-7420 or email us at privacy@dodgeandcox.com. We may ask for specific information from you to help us confirm your identity. You are also entitled to empower an "authorized agent" to submit requests on your behalf. We will require authorized agents to confirm their identity and authority, in accordance with applicable laws. You are entitled to exercise the rights described above free from discrimination.

Your choices may be limited, such as where fulfilling your request would impair the rights of others, our ability to provide a service you have requested, or our ability to comply with our legal obligations and enforce our legal rights. If you are not satisfied with how we address your request, you may submit a complaint by contacting us as provided above.



### **Financial Privacy Notice**

This Financial Privacy Notice applies to individuals who engage with Dodge & Cox in their personal or household capacity.

FACTS	WHAT DOES DODGE & COX 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?	The types of personal information we collect and share depend on the product or service you have with us.         This information can include:         • Social Security number       • Account balances         • Account transactions       • Transaction history         • Checking account information       • Wire transfer instructions         When you are no longer our customer, we continue to share your information as described in this notice.	
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 Dodge & Cox chooses to share; and whether you can limit this sharing.	

Reasons we can share your personal information	Does Dodge & Cox share?	Can you limit this sharing?
For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
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 nonaffiliates to market to you	No	We don't share

QUESTIONS?

Call 415-981-1710 or go to dodgeandcox.com

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What we do	
How does Dodge & Cox 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 Dodge & Cox collect my personal information?	<ul> <li>We collect your personal information, for example, when you</li> <li>Open an account</li> <li>Pay us by check</li> <li>Give us your contact information</li> </ul>
Why can't I limit all sharing?	<ul> <li>Federal law gives you the right to limit only</li> <li>Sharing for affiliates' everyday business purposes— information about your creditworthiness</li> <li>Affiliates from using your information to market to you</li> <li>Sharing for nonaffiliates to market to you</li> <li>State laws and individual companies may give you additional rights to limit sharing.</li> </ul>
Definitions	
Affiliates	<ul> <li>Companies related by common ownership or control. They can be financial and nonfinancial companies.</li> <li>Dodge &amp; Cox affiliates include financial companies Dodge &amp; Cox Funds, Dodge &amp; Cox Worldwide Funds plc, Dodge &amp; Cox Worldwide Investments Ltd., and Dodge &amp; Cox (Europe)GmbH</li> <li>Dodge &amp; Cox doesn't share with nonaffiliates so they can market to you.</li> </ul>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. Dodge & Cox doesn't share with nonaffiliates so they can market to you.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Dodge & Cox doesn't jointly market.