

Privacy Notice

FACTS - What does Westwood 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 may include:

- Social Security Number
- Income
- Assets
- Investment Experience
- Account Transactions
- Risk Tolerance

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 Westwood chooses to share; and, whether you can limit this sharing.

Reasons we can share your personal information	Does Westwood share?	Can you limit this sharing?
For our everyday business purposes - such as to process your transactions, maintain your account(s) or respond to court orders and legal investigations	Yes	No
For our marketing purposes - to offer our products and services to you	Yes	Yes
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes - information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes - information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For non-affiliates to market to you	Yes	Yes



Additional information

For more details on how we protect your personal information, please visit our website at <https://westwoodgroup.com/privacy-policy/>

If you have questions or want to limit our sharing:

**For Westwood Trust or Westwood Advisors, LLC clients,
call Michelle Neber at 214.756.6984**

For Westwood Management clients, call Emily Dowden at 214.756.6991

Please note: If you are a new customer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

Revised 10/2019



Who is providing this notice? Westwood Holdings Group, Westwood Management Corp., Westwood Trust, Westwood Advisors, LLC and Westwood International Advisors, Inc.

How does Westwood 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 Westwood collect my personal information? We collect your personal information, for example, when you

- Open an account
- Seek Financial Advice
- Seek Advice about your investments
- Tell us about your investment or retirement portfolio
- Give us your employment history

Why can't I limit all sharing? Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes - information about your creditworthiness
- affiliates from using your information to market to you
- sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

What happens when I limit sharing for an account I hold jointly with someone else? Your choices will apply to everyone on your account - unless you tell us otherwise.

Definitions

Affiliates: Companies related by common ownership or control. They can be financial and non-financial companies. Our affiliates include Westwood Management Corp., Westwood Trust, Westwood Advisors, LLC and Westwood International Advisors, Inc.

Non-Affiliates: Companies not related by common ownership or control. They can be financial and non-financial companies. Westwood only shares information with non-affiliates with your consent or for our or our affiliates' everyday business purposes.

Joint Marketing: A formal agreement between non-affiliated financial companies that together market financial products or services to you. Westwood Trust and Westwood Advisors, LLC enter into joint marketing agreements with unaffiliated financial companies, but these agreements prohibit disclosure of your nonpublic personal information except as may be permitted by applicable law.

Other Important Information



Westwood Trust Department of Banking Disclaimer: Westwood Trust is chartered under the laws of the State of Texas and by state law is subject to regulatory oversight by the Texas Department of Banking. Any consumer wishing to file a complaint against Westwood Trust should contact the Texas Department of Banking through one of the means indicated below:

- In person or U.S. Mail: 2601 North Lamar Boulevard, Suite 300, Austin, TX 78705-4294
- Fax Number: 512.475.1313
- E-mail: consumer.complaints@banking.state.tx.us
- Website: www.banking.state.tx.us

Revised 10/2019



Privacy Notice Supplement

Because Your Trust Is So Important

This PRIVACY NOTICE supplements the information contained in the Privacy Statement of Westwood Holdings Group, Inc. (“WHG”) and its subsidiaries. Your trust is the cornerstone of our relationship. That is why we work so diligently to safeguard your privacy. The information that you provide us is kept in the strictest of confidence. We have no intentions of selling personal information about our clients to third-party businesses. We are proud to make that commitment to you, because your trust is the foundation of our business.

Additionally, this notice is intended to comply with the **California Consumer Privacy Act of 2018 (“CCPA”)**, other California privacy laws, and the laws of various states with substantially similar pending or passed legislation. The CCPA was enacted to protect the personal information of California residents. Any terms defined in the CCPA have the same meaning when used in this notice.

All business lines and all employees are expected to adhere to our policies regarding information security. In addition to our Privacy Notice, the following provides further detail on how we use and protect our clients’ information. We ask that you read it carefully.

Westwood, we, our, and us, when used in this supplement, shall mean Westwood Holdings Group, Inc., Westwood Management Corp., Westwood Trust, Westwood Advisors, LLC and Westwood International Advisors, Inc.

You and your, when used in this supplement, shall mean all current and former Westwood clients, prospects, and consumers who have shared personal information with Westwood.

The Information We Collect

We collect personal information in connection with providing a financial product or service to you. To help the government fight the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. Therefore, when you open an account, we collect information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household (“personal information”). In particular, if indicated with a “yes” below, we have collected the categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifiers, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
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, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act [20 U.S.C. Section 1232g, 34 C.F.R. Part 99]).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

Personal information does not include:

- Information lawfully made available in government records, such that it is considered publicly available.
- De-identified or aggregated consumer information.
- Information excluded from the CCPA's scope, such as:
 - Health or medical information covered by the Health Insurance and Portability Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver's Privacy Protection Act of 1994.

Use of Personal Information

The reasons that we can share your personal information are set out in the Privacy Notice above. In addition, we may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided. For example, if you provide us with personal information in order for us to determine risk tolerance, we will use that information to determine risk tolerance and an appropriate investment strategy.
- To improve our website performance and how its contents are presented to you.
- For analyzing current products and services and for product development.
- As necessary or appropriate to protect the rights, property or safety of us, our clients, or others.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by us is among the assets transferred.

We will not collect additional categories of personal information or use the personal information we collect for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

As stated in the Privacy Notice above, we may disclose your personal information with your written and informed consent. We may also disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

Category A: Identifiers

Category B: California Customer Records personal information categories

We disclose your personal information for a business purpose to the following categories of third parties:

- Our affiliates.
- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.

In the preceding twelve (12) months, we have not sold any personal information.

Destruction of Sensitive Data. All records and data are properly shredded prior to disposal.

Destruction of documents is handled by authorized employees and/or bonded companies when the shredding of large quantities of documents is required.

The Confidentiality, Security, and Integrity of Your Information

At Westwood, we restrict access to information about you to those employees who need to know that information in order to provide products and services to you. We maintain physical, electronic, and procedural safeguards to protect this information. We also understand that clients play a critical role in the protection of online accounts from protecting passwords to keeping your computer updated and patched. We share occasional insights on our cybersecurity site that may be of interest in this regard.

Westwoodgroup.com does use “HTTP cookies” — tiny pieces of information that we ask your browser to store. However, we make very limited use of these cookies for website statistical information only. We will not share the information in our cookies.

Social Media

Westwood and select Westwood employees maintain profiles and/or pages on various social media platforms, including Twitter, Facebook, YouTube, Google+, Google My Business and LinkedIn (such social media platforms and any similar social media platforms added in the future are referred to hereinafter as the “platforms”). If you choose to “Follow” Westwood on any platforms or take any similar action on another similar platform, you are providing your consent to receive informational updates, including solicitations, from Westwood. To stop receiving this information from Westwood on a platform,

you must follow the procedure established by the platform. For example, on Twitter, you must click “Unfollow” on Westwood’s profile page.

What You Can Do

To protect your nonpublic, personal information, we recommend that you do not provide your account information or WHG’s username and password to anyone. If you become aware of any suspicious activity relating to your account, please contact us immediately at 214.756.6900.

California Consumer Protection Act: Your Rights and Choices

The CCPA provides California consumers (hereinafter, “Consumer”) with specific rights regarding their personal information. This section describes a Consumer’s CCPA rights and explains how to exercise those rights.

Requests to Know

Consumers have the right to request that we disclose certain information about our collection and use of personal information over the past twelve (12) months. Once we receive and confirm a verifiable consumer request, we will disclose the following to the Consumer:

- The categories of personal information we collected about the Consumer.
- The categories of sources for the personal information we collected about the Consumer.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about the Consumer.
- The personal information that was disclosed to third parties and the business purpose for disclosing that personal information to the third parties.

We, however, are prohibited from disclosing certain specific personal information for the purpose of balancing the Consumer’s right to know with the harm that may result from the inappropriate disclosure of information. Specific information that we are prohibited from disclosing includes: Social Security number, driver’s license number or other government-issued identification number, financial account number, account password, and security questions and answers.

Request to Delete

Consumers have the right to request that we delete any personal information that we collected from the Consumer and retained, subject to certain exceptions. Once we receive and confirm the Consumer’s verifiable consumer request, we will delete (and direct our service providers to delete) the Consumer’s personal information from our records, unless an exception applies.

We may deny a Consumer’s deletion request if retaining the information is required for us or our service providers to:

- Complete the transaction for which we collected the personal information, provide a good or service that was requested, take actions reasonably anticipated within the context of our ongoing business relationship with the Consumer, or otherwise perform our contract with the Consumer.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
- Debug products to identify and repair errors that impair existing intended functionality.
- Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 seq.).
- Comply with a legal obligation.
- Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access and Deletion Rights

To exercise the access and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 214.756.6900
- Visiting www.westwoodgroup.com

Only the Consumer or a person legally authorized to act on the Consumer's behalf may make a verifiable consumer request related to personal information. A Consumer may also make a verifiable consumer request on behalf of a minor child.

A Consumer may only make a verifiable consumer request for access twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify the Consumer is the person about whom we collected personal information or an authorized representative.
- Describe the Consumer's request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to a Consumer's request or provide the Consumer with personal information if we cannot verify the Consumer's identity or authority to make the request and confirm the personal information relates to such Consumer. Making a verifiable consumer request does not require a Consumer to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. The Consumer will be notified if we are unable to verify their identity or authority to make the request.

Response Timing and Format

We will use best efforts to confirm receipt of a request to know or request to delete within 10 days and provide information about how we will process the request, our verification process, and when the Consumer should anticipate a response. We will use best efforts to respond to a verifiable consumer request within 45 days of its receipt. If we require more time (up to 90 days in total), we will inform the

Consumer of the reason and extension period in writing. If the Consumer has an electronic account with us, we will deliver our written response to that account. If the Consumer does not have an account with us, we will deliver our written response by mail or electronically, at the Consumer's direction. Any disclosures we provide will only cover the 12-month period preceding the receipt of the verifiable consumer request. If appropriate, the response provided will explain the reasons we cannot comply with a request. Responses to requests for personal information data will be provided to a Consumer in a form that is readily useable, which should allow the Consumer to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to a Consumer's verifiable consumer request unless it is excessive, repetitive, or unfounded. If we determine that the request warrants a fee, we will tell the Consumer why we made that decision and provide a cost estimate before completing the request.

Non-Discrimination

We will not discriminate against a Consumer for exercising any CCPA rights. Unless permitted by the CCPA, we will not:

- Deny the Consumer goods or services.
- Charge the Consumer different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide the Consumer a different level of quality of goods or services.
- Suggest that the Consumer may receive a different price or rate for goods or services or a different level or quality of goods or services.

Changes to Our Privacy Notice

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will provide notice through email or a posting on our website (www.westwoodgroup.com).



Contact Information

If you have any questions or comments about this notice, our Privacy Statement, the ways in which we collect and use your personal information, your choices and rights regarding such use, or wish to exercise your rights under the CCPA, please contact us at:

Phone: 214.756.6900

Website: www.westwoodgroup.com

Address: Westwood Holdings Group, Inc.
C/O Julie K. Gerron, General Counsel & CCO
200 Crescent Court
Suite 1200
Dallas, TX 75201

