



| FACTS | WHAT DOES KEYCORP DO WITH YOUR PERSONAL INFORMATION? |
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| Why? | Financial companies choose how they share 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 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 and services you have with us. This information can include: <ul style="list-style-type: none"> • Social Security number and income • Account balance and payment history • Credit history and credit scores |
| How? | All financial companies need to share customer's 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 KeyCorp (Key) chooses to share, and whether you can limit this sharing. |

| Reasons we can share your personal information | Does Key Share? | Can you limit the sharing? |
|---|-----------------|----------------------------|
| For our everyday business purposes - such as to process your transactions, maintain your accounts, and 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 | YES | NO |
| For our affiliates' everyday business purposes - information about your transactions and experiences | YES | NO |
| For our affiliates everyday purposes - information about your credit worthiness | YES | YES |
| To our affiliates to market to you | YES | YES |
| For nonaffiliates to market to you | NO | We don't share |

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| To limit our sharing | <ul style="list-style-type: none"> • Call 1-800-361-0968 - our menu will prompt you through your choices • Visit us online: www.key.com/security <p>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 can continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p> |
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| Questions? | Call 1-800-361-0968 or go to www.key.com/security |
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Page 2

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| Who we are | |
| Who is providing this notice? | KeyCorp (Key) and the Key family of companies (see affiliate list below). |

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| What we do | |
| How does Key protect my personal information? | To protect your information from unauthorized access and use, we use security measures that comply with federal law. These measures includes computer safeguards and secured files and buildings. |
| How does Key collect my personal information? | We collect your personal information, for example, when you <ul style="list-style-type: none"> • Open and account or deposit moneys • Pay bills or apply for products and services • Use your credit card or debit card. We also collect your personal information from others such as credit bureaus, affiliates, or other companies. |
| Why can't I limit all sharing? | Federal law gives you the right to limit only <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 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? | If you have a product held jointly with another person(s), each of you may opt out individually or you may opt out for each other. |

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| Definitions | |
| Affiliates | Companies related by common ownership or control. They can be financial and nonfinancial companies. The Key family of companies, includes: KeyBank National Association; KeyBanc Capital Markets Inc.; Victory Capital Management Inc.; Victory Capital Advisers, Inc.; Key Financial Services Inc.; Key Investment Services LLC; KeyCorp Insurance Agency, Inc. (NY); KeyCorp Insurance Agency USA Inc.; KeyCorp Insurance Agency USA Inc. (ID); KeyCorp Insurance Agency USA Inc. (WA); KeyTrust Company National Association; Austin Capital Management LTD; Austin Capital Offshore Management, LLC; Key Trust Company of |

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| | <p>Company National Association, Austin Capital Management L.P., Austin Capital Onshore Management, LLC, Key Trust Company of Delaware.</p> <p>For a current list of the members of the Key family of companies, visit www.key.com/privacy.</p> |
| Nonaffiliates | Companies not related by common ownership or control. They can be financial and nonfinancial companies |
| Joint Marketing | A formal agreement between nonaffiliated financial companies that together market financial products or services to you. |

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| Other Important Information | | | | | | | | | | | | | |
| <p>You may have other privacy protections under applicable state laws. For example, if you have a California or Vermont mailing address we will automatically limit internal sharing and sharing for marketing use within the Key family of companies. Key does not share customer information with third parties, except as permitted by law. These sharing limitations will continue for as long as our records indicate you are a Vermont or California consumer. If our records show you no longer reside in Vermont or California, your opt outs will revert back to the preference(s) originally on file with Key. However, you may still limit sharing by recording your preferences with Key, by calling our toll-free Privacy Line at 800-361-0968.</p> <p>Special Notice for Nevada (Nevada law also requires that we provide you with the following contact information)</p> <table> <tr> <td>KeyCorp</td> <td>Bureau of Consumer Protection</td> </tr> <tr> <td>Privacy Department</td> <td>Office of the Nevada Attorney General</td> </tr> <tr> <td>OH-01-10-0602</td> <td>555 E. Washington Street, Suite 3900</td> </tr> <tr> <td>100 Public Square</td> <td>Las Vegas, Nevada 89101</td> </tr> <tr> <td>Cleveland, OH 44113-2207</td> <td>Phone: (702) 486-3132</td> </tr> <tr> <td></td> <td>Email: BCPINFO@ag.state.nv.us</td> </tr> </table> | | KeyCorp | Bureau of Consumer Protection | Privacy Department | Office of the Nevada Attorney General | OH-01-10-0602 | 555 E. Washington Street, Suite 3900 | 100 Public Square | Las Vegas, Nevada 89101 | Cleveland, OH 44113-2207 | Phone: (702) 486-3132 | | Email: BCPINFO@ag.state.nv.us |
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