NEUBERGER | BERMAN

Rev. 01/2020

EMPLOYEE PRIVACY NOTICE

Neuberger Berman Group LLC, together with its affiliates and subsidiaries (collectively, "Neuberger Berman**,**" "we," us," or "our"), provides this Employee Privacy Notice (the "Privacy Notice"), as Neuberger Berman believes your privacy is important. The Privacy Notice applies to all Neuberger Berman employees based in the United States or Canada or employed by a United States or Canadian affiliate. We ask that you read this Notice carefully.

This Privacy Notice describes how we collect, use, and disclose information from employees, owners, directors, officers, and contractors of Neuberger Berman. The words "user," "employee," "you," and "your" shall refer to our employees, owners, directors, officers, or contractors.

I. INFORMATION WE COLLECT

We collect information in connection with your working relationship with us.

Certain of the information we collect may be personal information, by which we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a natural person or household, such as a real name, postal address, e-mail address, telephone number, payment information, and account ID. When other information is directly associated with personal information, we also consider that information to be personal information. Information that is aggregated, de-identified, or anonymized will not be considered personal information. Publicly available information that is made available from federal, state, or local government records, also is not personal information.

The information we collect varies depending on how you interact with us. In addition, we may receive this information from you directly, or we may obtain information about you automatically, or from third parties. This information can include:

- Identification and contact information (for example, name, job title, work location, gender, home address, work and personal email addresses, work and personal telephone numbers, mobile phone number, Social Security Number, taxpayer or government identification number, driver's license number, date of birth/age, marital status, race or ethnic origin, veteran status, disability status, employee identification number, emergency contacts, dependent names);

- Residency, citizenship, or work permit status, visa number, military status, nationality, and passport information;

- Payroll information (for example, banking details, W-2 forms), and other banking or other financial information for reimbursements, or other payments, authorized by you, or on your behalf;

- Wage, salary, and benefit information;

- Sick pay, Paid time Off ("PTO") and requests, retirement accounts, pensions, insurance, and other benefits information (including from beneficiaries or dependents), whether through Neuberger Berman or otherwise;

- Information collected from the hiring and termination processes (for example, interview information, CV or resume, cover letters, references, reference letters, transcripts, pre-hire interactions, letters of reference, social media, letters of offer and acceptance dates of hire, start and end dates, resignation date and reasons);

- Skills, work experience (including at Neuberger Berman and outside Neuberger Berman), education, certificates, registrations, professional license numbers, training, and language abilities;

- Performance-related information (including reviews, references, disciplinary procedure information, attendance records);

- Other information provided in forms as required for benefits, payroll, or human resources, in accordance with applicable laws;

- Height, weight and clothing sizes, as needed;

- Physical limitations and special accommodations needed;

- Where permitted by law and applicable, we may collect the results of credit and criminal background checks, the results of drug and alcohol testing, screening, health certifications, vehicle registration and driving history;

- Information required for us to comply with laws, including at the direction of law enforcement authorities or court orders;

- Acknowledgements relating to receipt of or agreement to Neuberger Berman policies;

- Employee photo, video surveillance footage, other images or photographs, and key card use times and locations;

- Biometric information (for example, fingerprints) for security purposes;

- Voicemails, e-mails, correspondence, documents, and other work product and communications created, stored or transmitted using our networks, applications, devices, computers, or communications equipment;

- Online browsing information;

- Location information, including through GPS tracking technology, of Neuberger Berman devices and computers;

- Medical and health information, as needed, and in accordance with applicable laws;

- User I.D., password, and any other credentials used to access Neuberger Berman networks, applications, devices, computers, or communications equipment;

- Identification information for verification (for example, a copy of a state identification card);

- Purchase activity (for example, if you have purchased any products or services in the past);

- Survey or feedback information (for example, if you fill out a survey, or provide feedback, we collect your responses);

- Other personal information that you may provide to us, and that may be personal information.

We reserve the right to monitor the use of our premises, equipment, devices, computers, network, applications, software, and similar assets and resources. In the course of such monitoring, we may collect personal information about you. The use of the information will be in accordance with this Privacy Notice.

II. HOW WE USE INFORMATION WE COLLECT

We may use your information in accordance with this Privacy Notice to:

- Recruit employees and complete the hiring process;
- Provide you with equipment, training, educational training, and support, and track compliance, as needed;
- Administer, pay, provide, and manage benefits;
- Manage staffing resources, financial planning, corporate compliance, internal audits, and other administration;
- Communicate with you, and facilitate communications between you and other individuals;
- Comply with legal obligations, including health and safety requirements, and requests for information from government agencies, and security investigations, or to assert or defend a legal claim;
- Pay you, including your salary, reimbursements, and other expenses;
- Monitor and evaluate your performance;
- Track time and attendance;
- Recognize, reward, and empower you as an employee, and understand what makes you perform better;
- Provide employment references, if requested by you or a potential employer;
- Administer our applications, software, and electronic systems;
- Improve employee satisfaction and performance;
- Process employee work-related claims (including workers' compensation);
- Provide the services you or others request;
- Complete the transactions you have requested;
- Provide you with an account, and manage your account;
- Respond to communications from you;
- Notify you about updates to our websites, business, mobile applications, or services;
- Measure and improve our business, services, and performance, including our current and future services and tools, customer service and sales performance, mobile applications, social media presence, and website layout and content;
- Perform analyses on the data we have collected, such as market analyses, trends, and other research for statistical purposes;

- Process, provide, and administer surveys, events, and special promotions;
- Provide, administer, and utilize our social media pages and websites;
- Compare information and identification for accuracy and verify it, including for identification purposes;
- Assist you with obtaining an immigrant visa or work permit, or verify your eligibility to work in the United States, as needed;
- Anonymize or otherwise protect your data;
- Prevent potentially fraudulent, prohibited, or illegal activities;
- Protect the safety and security of our workforce, guests, property, and assets (including controlling and facilitating access to and monitoring activity on and in our premises and activity using our computers, devices, networks, communications, and other assets); and
- Generally manage all aspects of an employee's employment relationship with us, including but not limited to establishing, maintaining, and terminating employment relationships, general operations, and administrative, financial, and human resources related purposes.

We may disclose other purposes, or update this Privacy Notice, from time to time.

III. CATEGORIES OF THIRD PARTIES WITH WHOM WE SHARE INFORMATION

Neuberger Berman does not sell your personal information to third parties, and will not sell your personal information to third parties. We may, at times, disclose personal information we collect to the following categories of third parties, for the purposes identified above, or with your consent:

- Our group of companies, affiliates, and subsidiaries in accordance with this Privacy Notice;
- With third parties to manage aspects of your relationship with us and to effectuate the uses of personal information described in the How We Use Personal Information We Collect section above, including third party service providers who access information about you to perform services on our behalf;
- Third parties who may provide professional advice (for example, lawyers, bankers, accountants);
- With other persons with whom you have requested that we share information, in order to fulfill services you request;
- In connection with, or during the negotiation of, any merger, sale of company stock or assets, financing, acquisition, divestiture, or dissolution of all or a portion of our business;
- If we believe that disclosure is reasonably necessary (a) to comply with any applicable law, regulation, legal process or governmental request; (b) to enforce our policies, (c) to protect our rights or property, or the security or integrity of our services, or (d) to protect us, users of our services or the public from harm or potentially prohibited or illegal activities.

When sharing information with third parties, we require that they only use or disclose your personal information as necessary to effectuate the purpose and uses described.

IV. SECURITY

We take reasonable precautions, including physical, electronic, and procedural safeguards, to protect your information. We make reasonable efforts to maintain security on our systems. Despite our efforts,

we cannot guarantee that personal information may not be accessed, disclosed, or altered by breach of our safeguards. We urge you to take adequate precautions to protect your personal information.

V. CHANGES TO THIS PRIVACY NOTICE

We may update this Privacy Notice periodically to account for changes in our collection and use of your personal information. If we make any changes to this Privacy Notice, we will provide notice of such changes, as appropriate. For example, we may send you an email notification, or we may post a new Notice on the firm's intranet site. For administrative changes, we may provide indication in our Privacy Notice by updating the "Rev." date at the top of this document.

VI. CONTACT

If you have any questions regarding our Privacy Notice, or if you need to access the Notice in an alternative format due to a disability, please contact the firm's Privacy Hotline at NBPrivacyOfficer@nb.com or by telephone at (646) 497-4003 or toll-free at (866) 483-1046.