

COWEN

Online Privacy Policy and Cookie Policy

This notice describes the Online Privacy Policy and Cookie Policy for Cowen Inc. and all its affiliates (collectively referred to herein as “Cowen”, “we” or “us”). The term “you” refers to the consumer with whom we have a current or former relationship.

Cowen appreciates your visits to www.cowen.com (“the Cowen Website”). Cowen seeks to maintain the highest level of confidentiality and security of personal client information. While visiting the Cowen Website, we take care to protect your personal data that is collected, processed and used during these visits. ***By accessing the Cowen Website you agree to and accept this Online Privacy Policy and Cookie Policy.***

This Online Privacy Policy and Cookie Policy applies to personal information obtained by Cowen through your use of the Cowen Website. It is not applicable to any Internet websites controlled by third parties not affiliated with Cowen that the Cowen Website may link to (“Third Party Sites”). Please be sure to review the privacy policies for those Third Party Sites.

This notice applies to both our former and current clients unless stated otherwise. This notice replaces all previous online privacy and cookie notices and may be amended from time to time. Please read this notice in its entirety to understand what we do with your personal information.

I. Information We May Collect

During your use of the Cowen Website, our webserver will automatically record details about your visit including, but not limited to, your IP address, type of browser software used, the Cowen webpages visited and the duration of your visit. Personal information may be collected as well to the extent you enroll, register or access your account(s) online. Personal information that you input online (e.g., your name, email address, etc.) may be collected. We may also gather information collected through cookies, tags and other technologies.

II. Cookies

By using the Cowen Website with your browser settings adjusted to accept cookies, you consent to our use of cookies and other tools to provide the products and services available on those sites. If you would like to modify your browser to notify you when you receive a new cookie or to disable cookies altogether, you are free to do so. The Help menu on the menu bar of most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie and how to disable cookies altogether.

Cookies are small text files that may be placed on your web browser when you visit the Cowen Website or when you view advertisements we have placed on other web sites. Cookies allow your browser to remember some specific information which the web server can later retrieve and use. Cowen does not use cookies to store any personal information that could be read or understood by others. Any cookie

we set will only contain random but unique information. The cookie does not contain any personal or sensitive information.

Cookies are used primarily for administrative purposes, to improve your experience with our Web site.

The type of information collected includes:

- **Page Information**
 - URL – the URL of the page the user is viewing
 - Title – the title of the page the user is viewing
- **Browser Information**
 - Browser name – the browser the user is using
 - Viewport or Viewing pane – the size of the browser window
 - Screen resolution – the resolution of the user’s screen
 - Java enabled – whether or not the user has Java enabled
 - Flash version – what version of Flash the user is using
- **User Information**
 - Location
 - Language

Our website uses cookies to distinguish you from other users of the website, to help us measure how users interact with Website content and/or as part of the security of this site. The use of these cookies are essential for the correct and secure operation of our website and are not being used to gather information unnecessarily.

III. How Does Cowen Use and Share Personal Information Collected on the Cowen Website?

Cowen uses the information collected via the Cowen Website in accordance with our [U.S. Privacy Policy](#) and [Non U.S. Privacy Policy](#).

IV. Protecting Your Personal Information

In addition to our internal policies governing the proper handling of your personal information, Cowen maintains physical, electronic and procedural safeguards that comply with applicable law to help protect the personal information we collect about you. It is our goal to protect your personal information against loss, misuse, damage, modification, unauthorized access, disclosure, alteration and/or destruction. We restrict access to personal information about you to those employees, agents or other parties who need to know that information to provide products and services to you or in connection with your investments with or through us. We require third parties that provide Cowen support or marketing services to adhere to appropriate security standards.

V. Security of Data Transfers

Data that is transported over an open network, such as the Internet or e-mail, may be accessible to anyone and therefore is not generally regarded as a safe environment. Cowen cannot guarantee the confidentiality of any communication or transmission of information via an open network. Cowen accepts no responsibility or liability for the security of your information while in transit over the Internet to Cowen. Other, more secure means of communication with Cowen remain available.

VI. Children's Privacy

Cowen does not knowingly collect personal information from individuals under the age of 13 without obtaining verifiable consent from their parents. We request that such individuals do not provide personal information through this service.

For more information about the Children's Online Privacy Protections Act (COPPA) please visit the FTC website at www.ftc.gov.

VII. Additional Protections Under the General Data Protection Regulation ("GDPR")

You may be entitled to additional protections under GDPR if you reside in the European Union ("EU"). Cowen has designed and developed mechanisms to ensure that personal information that is collected is only used as necessary for specific purposes, it is retained for no longer than necessary and is only made available to those with a legitimate need to know. Personal information is only collected and processed if there is a lawful basis to do so.

For further information, please see [Cowen's EMEA Privacy Notice](#)

VIII. Actions You Can Take With Respect to Personal Data Held by Cowen

In certain jurisdictions, where permitted by applicable law, you may check whether we hold your personal data, ask us to provide you with a copy of your personal data, require us to correct any of your personal data, object to further processing of your data, rescind your prior consent to process your personal data, request your data be erased or request that your data be transferred to a new service provider. If you have questions concerning your rights or would like to make a request please send a letter to the following contact.

Head of Compliance

Cowen Execution Services Limited

1 Snowden Street

London, EC2A 2DQ