

Payden & Rygel

U.S. Privacy Notice

Effective Date: September 1, 2026

For a printable version of this Privacy Notice, please [click here](#).

1. INTRODUCTION

PURPOSE OF THIS PRIVACY NOTICE

Welcome to Payden & Rygel's U.S. Privacy Notice ("Privacy Notice"). In the ordinary course of its business Payden & Rygel ("Payden & Rygel," "us," or "we") may receive, store and manage the personal data of individuals. It is a principle of the firm that this data will be processed lawfully, fairly and with full transparency, and such data will at all times be securely stored. We only retain and process personal data to the extent necessary to carry out the firm's normal business activities and to fulfil its commitments to our clients, shareholders, staff and contractors. Payden & Rygel respects your privacy and is committed to protecting your personal data.

This Privacy Notice applies to Payden & Rygel's information practices relating to the personal data of prospective clients, business contacts, individuals that visit our Website at <https://www.payden.com/>, or individuals who apply for a position with us.

If you are a current or former client of Payden & Rygel, or a fund shareholder, some of the personal data we may collect about you is considered "non-public personal information," as defined under the federal Gramm-Leach-Bliley Act ("GLBA"). Information about how we collect, use, and disclose "non-public personal information" subject to the GLBA is outlined in and governed by the Payden & Rygel Client Privacy Notice.

It is important that you read this Privacy Notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your personal data. This Privacy Notice supplements the other notices and is not intended to override them.

WEBSITE THIRD-PARTY LINKS

Our Website may, from time to time, include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share personal data about you. We do not control these third-party Websites and are not responsible for their privacy practices. When you leave our Website, we encourage you to read the privacy notice of every Website you visit.

CHANGES TO THIS PRIVACY NOTICE

From time to time, Payden & Rygel may update or revise this Privacy Notice, which becomes effective on the date indicated at the top of this Privacy Notice. Please check back frequently to see any updates or changes. Where required by law, we will obtain your consent or make reasonable efforts to provide at least 30 days' notice prior to any material revisions taking effect, so please ensure that any personal data we hold about you is accurate and current.

2. NOTICE AT COLLECTION

We may collect or process different kinds of personal data, depending on how you interact with our Website, or when you apply for a position with us. We may collect: Identifiers; Commercial Data; Financial Data; Internet or Other Network Activity; Audio, Electronic, Visual, or Similar Data; Location Data; Content of Communications; Demographic Data; Video Viewing History; and any other personal data you provide to us or we and third parties collect when you interact with us. For job applicants, we and third party employment services acting on our behalf, may also collect Professional or Employment Data; Education Data; and Sensitive Personal Data (such as, Social Security number, driver's license, state identification card, or passport number; health information or disability status; criminal history; and citizenship or immigration status) and any other personal data you provide to us during the application process. We may use any of this personal data collected to create inferences about you. We do not knowingly collect personal data from children (defined as individuals under the age of 16).

Personal data collected is used for: internal business purposes and basic business operations; improving our Website or services; advertising and marketing; security; and legal compliance. Job applicant personal data is also used to manage and consider your application, for pre-employment screening, and to provide information to you about additional career opportunities.

We may disclose the personal data collected from you: within Payden & Rygel; with service providers, vendors or agents; to third parties during a change in ownership, such as a merger or bankruptcy; with law enforcement agencies, courts, regulators, government authorities when legally required to do so; with our social media partners; or where we have received your direction or consent to the disclosure of your personal data.

We retain and store your personal data as long as necessary for the intended purposes and in line with our data retention policy. Please review the sections below for more specific information about what kinds of personal data we collect and how we use it, whether we sell or share your personal data, how we use, communicate, disclose and otherwise process your personal data, what rights you may have and how to contact us. If you have a general question, including about our collection of your personal data, please see the “Contact Us” section below or [click here](#).

3. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, also referred to as “personal information” under certain laws, means any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household.

We, or third parties acting on our behalf, may collect, use, store, disclose, and/or transfer the following categories of personal data about you, as follows:

- **Identifiers**, such as first name, maiden name, last name, email address, mailing address, telephone number, username, or similar identifiers.
- **Demographic Data**, including marital status; date of birth; and gender.
- **Commercial Data**, such as records of services considered.
- **Financial Data**, includes financial account, credit history, and payment card details.
- **Professional or Employment Data**, such as your employer name; employee email; employee telephone number; and job title.
- **Internet or Other Electronic Network Activity**, such as internet protocol (IP) address; your login data; device ID; browser type and version; time zone setting and location; browser plug-in types and versions; operating system and platform; internet activity or social media activity; web pages visited; and information about how you interact with or access our Website or other online content. We may also collect data about your interactions with communications we send electronically, such as our weekly market updates and prospectus information.
- **Geolocation Data**, such as an IP address that identifies your general location.
- **Content of Communications** includes the content of your phone calls, texts, or emails when you contact us, including your preferences for receiving communications from us.
- **Audio, Electronic, Visual, or Similar Data**, such as voice recordings when you contact business development, client management, or customer support, or the audio, video, or transcripts of virtual meetings we conduct with you.
- **Inferences**, which is personal data derived from other personal data that reflects your preferences, characteristics, or other attributes.
- **Sensitive Personal Data**, such as union membership.
- **Other Personal Data**, including any other personal data you may provide to us or that we may collect or process in the course of our normal business activities.

ADDITIONAL PERSONAL DATA COLLECTED FROM JOB APPLICANTS

- **Professional or Employment Data**, such as your employer name; employee email; employee telephone number; employment history; job title; and regulatory licenses, registrations, or related statuses.
- **Education Data**, including education history; education transcripts; level of education; and professional certifications or charters.
- **Sensitive Personal Data**, such as such as Social Security number, driver's license, state identification card, or passport number; criminal history from a background check, and citizenship, immigration, or work authorization/employment eligibility status.
- **Other Personal Data**, including any other personal data provided during the job application process, such as details about the type of employment you are seeking; current or desired salary; criminal history provided in a background check; and information related to any assessments you may take as part of the applicant screening process or any information provided by professional references.

CHILDREN'S PERSONAL DATA

Our Website and services are designed and intended for individuals aged 16 and older. If we learn that we have collected personal data from an individual under the age of 16 (a "child"), we will delete that personal data within the timeframe required by applicable law.

DEIDENTIFIED DATA

The term "personal data" does not include deidentified data, which is data that cannot be reasonably used to infer information about you or otherwise be linked to you. We maintain and use any deidentified data in deidentified form and will not attempt to reidentify that information.

4. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you, including through:

- **Direct interactions.** You may give us your personal data when you, fill in forms; communicate with us by mail, phone, email, or sign up for a newsletter or other published content; apply for a position with us; or provide us with feedback. The categories of personal data collected directly from you may include your Identifiers; Demographic Data; Commercial Data; Financial Data; Professional or Employment Data; Education Data; Content of Communications; Audio, Electronic, Visual, or Similar Data; Sensitive Personal Data; and Other Personal Data.
- **Cookies and similar online tracking technologies.** We may automatically collect personal data indirectly from you via cookies and similar online tracking technologies (see "Cookies" section below) when you interact with our online properties, such as our Website, social media pages, or other digital content, including marketing emails, tagged links, hosted files, interactive infographics, or landing pages delivered through third-party platforms. This collection may include your Identifiers; Internet or Other Electronic Network Activity; and Geolocation Data.
- **Service providers, third parties, or publicly available sources.** We may receive personal data about you from various third parties, such as your employer; via social media platforms (such as LinkedIn); job recruiters, job search engines, and third party employment websites, services, and apps; and marketing partners. We may also perform an Internet search to review any public-facing social media pages or Websites that contain your personal data. This collection may include your Identifiers; Demographic Data; Professional or Employment Data; Education Data; Content of Communications; Internet or Other Electronic Network Activity; Geolocation Data; Audio, Electronic, Visual, or Similar Data; Sensitive Personal Data; and Other Personal Data.

5. COOKIES AND SIMILAR ONLINE TRACKING TECHNOLOGIES

Our Website uses cookies, Software Development Kits ("SDKs"), web beacons, pixels, or other online tracking technologies (collectively, "cookies") when you visit or interact with our Website and other online properties. These tools help us to provide you with a good experience when you browse our Website and also allows us to improve our Website and online services.

How long these cookies stay on your device depends on what they need to do. For example, some cookies only work while you are visiting our Website and get deleted when you're done (session cookies). Others may stay on your device unless you choose to delete them (persistent cookies). Cookies may be placed by us (first party cookies) or by other businesses (third party cookies) when you visit our Website or other online properties.

The cookies used by us can be classified using the International Chamber of Commerce guide for cookie categories: Strictly Necessary, Performance, Functional, and Targeting. We may use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our Website. They include, for example, cookies that enable you to log into secure areas of our Website or areas requiring your acknowledgment or consent to proceed.
- **Analytical/performance cookies.** These cookies from third-party services allow us to recognize and count the number of visitors and to see how visitors move around our Website when they are using it. This helps us improve the way our Website works, for example, by ensuring that users find what they are looking for easily.
- **Functionality cookies.** These are used to recognize you when you return to our Website. This enables us to personalize our content for you, greet you by name or remember your preferences (for example, your choice of language or region).
- **Advertising/Targeting cookies.** These cookies record your visit to our Website, the pages you have visited and the links you have followed. We may use this information to make our Website more relevant to your interests. We may also share this information with third parties for this purpose.

YOUR COOKIE CHOICES

- **Google Analytics:** To help facilitate the delivery of relevant content, we use Google Analytics cookies to report on

user interactions on our Website. Google provides a complete privacy policy and instructions on opting out of Google Analytics here: <https://www.google.com/intl/en/analytics/privacyoverview.html>. Note that the opt-out is specific to Google activities and does not affect the activities of other ad networks or analytics providers that we may use.

- **Browser Signals:** The "Do Not Track" ("DNT") privacy preference is an option that may be made in some web browsers. At this time, not all browsers support DNT. In addition, the Global Privacy Control (GPC) signal is a browser or extension setting that communicates your privacy preferences to the websites you visit. GPC is supported by certain browsers and extensions, but is not widely available or enabled by default.
- **Browser Settings:** You may be able to block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. Check your browser's HELP menu to learn the correct way to change or update your cookies. You can also visit www.aboutcookies.org which contains more information on how to do this on many different browsers. Please see your mobile phone's manual or other instructions for information on how to do this on your phone's browser. Please note that if you use your browser settings to block all cookies (including strictly necessary cookies) you may not be able to access all or parts of our site.

6. HOW WE USE YOUR PERSONAL DATA

We will use your personal data in the following circumstances:

- To communicate with you about the services we provide or respond to your inquiries.
- Where we need to comply with a legal or regulatory obligation.
- For internal business purposes, such as to administer and maintain our business and Website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data).
- To use data analytics to improve our Website, products/services, marketing, customer relationships and experiences.
- For marketing or advertising purposes.
- To make suggestions and recommendations to you about services that may be of interest to you.
- To create deidentified, statistical, or aggregate data.
- To facilitate your participation in Payden & Rygel hosted events.
- To monitor and protect our Website, services, and employees, as well as to stop any activities that may be fraudulent or illegal, for debugging purposes, and to protect the security of the Website and the data we have collected.
- To evaluate your candidacy when you apply for a position with us.

Please note that we may use Artificial Intelligence ("AI") when processing personal data for the purposes set forth above.

7. DISCLOSURES OF YOUR PERSONAL DATA

We may have to disclose your personal data to the following recipients:

- Employees of Payden & Rygel, its subsidiaries, and joint venture partners.
- Service providers, vendors, contractors, or other third parties who assist us with our business operations, such as to respond to your communications or inquiries, or our Website analytics vendors.
- Law enforcement, regulators, or government agencies, when necessary to comply with applicable law, legal process, or lawful requests.
- During a change in ownership, such as a merger or bankruptcy, your personal data may be reviewed and transferred along with other business assets.
- Our social media partners (such as LinkedIn) may have access to your personal data when you click on a social media icon on our Website and are redirected to that social media partner's website.
- Professional contacts you have provided as references when you apply for a position with us.
- Your employer when you are acting on behalf of a business.

- Any other parties where we have received your direction or consent to the disclosure of your personal data.

SALE OR SHARING OF PERSONAL DATA

We work with third-party advertising and analytics partners and social media sites, and these partnerships may be considered a "sale" or "sharing" under the California Consumer Privacy Act, even though no money changes hands. For example, when you visit or interact with our Website or a webpage where cookies are present, that may be considered a "sale" or "sharing" of your personal data. Information that we may "sell" or "share" includes your Identifiers. Payden & Rygel does not knowingly sell or share the personal data of children (defined as individuals under the age of 16).

8. DATA SECURITY AND INTERNATIONAL DATA TRANSFERS

We maintain appropriate organizational, technical, administrative, and physical security measures to protect your personal data from accidental loss, use, unauthorized access, alteration, or disclosure. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to process your personal data. Please note that no data transmissions over the internet are 100% secure, so we cannot guarantee the security of any personal data you provide to us. You understand that any personal data you send is at your own risk.

We have implemented procedures to address any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so. If we learn of a personal data breach, we may attempt to notify you, including electronically, so that you can take appropriate protective steps. By using the Website or providing personal data to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of the Website. We may post a notice via our Website if a personal data breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances.

In order to communicate with you about content, the personal data that we collect from you may be transferred to, stored, used, and processed by Payden & Rygel or one of our service providers, which may be based in the United States or outside of the United States. If you are visiting from the European Economic Area or other regions with laws governing personal data collection and use that may differ from United States law, please note that the laws of the United States may not provide the same level of protection of personal data as your home country, particularly if you are resident in the European Economic Area. If you do not want your personal data transferred to the United States, please do not share your personal data with us.

9. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil our business interests, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

10. DISCLAIMER REGARDING VIDEO CONTENT

Our Website may contain video content, audiovisual content, or content of a like nature (collectively, "Video Content"). In connection with our provision of Video Content, our Website may utilize online tracking technologies and code-based tools, including, but not limited to, Software Development Kits ("SDKs"), pixels, and cookies (i.e., advertising or analytics cookies) that track information about your activity and webpage-viewing history on the Website (collectively, "cookies"). Cookies on the Website may result in information about your activity on our Website being transmitted from your browser to us and third parties, which, in turn, may result in the display of targeted advertisements on third-party Websites, platforms, and services, including advertisements for our content. In addition, whether cookies on the Website result in your browser's transmission of information to third parties depends on a number of factors that may be outside of our knowledge or control, including what third-party Websites you use, what personal data you have provided to such third parties, and whether (and the extent to which) you have limited the use of cookies by the operators of those third-party Websites, platforms, and services.

11. YOUR PRIVACY RIGHTS

OPTING OUT

You may sign-up to receive email, newsletters, or other communications from us. If you would like to discontinue receiving this information, you may update your email preferences by using the "Unsubscribe" link found in emails we send to you or by contacting us via the contact information below. If you unsubscribe, you may still receive

transactional or relationship emails from us.

ADDITIONAL RIGHTS FOR CALIFORNIA RESIDENTS

California residents, under the California Consumer Privacy Act ("CCPA"), have the following rights, subject to some legal exceptions:

- **Right to know and access** information about the categories and specific pieces of personal data we have collected about you, as well as the categories of sources from which such information is collected, the purposes for collecting such personal data, and the categories of third parties with whom we share such personal data. You may also have the right to know if we have sold or disclosed your personal data, and to whom. You may also request to receive a copy of the personal data we have collected, which we will provide in a readily usable electronic form.
- **Right to delete** your personal data.
- **Right to correct** your personal data if inaccurate.
- **Right to opt out of the sale or sharing for cross-contextual behavioral advertising purposes** of your personal data to third parties.
- **Right to limit the use and disclosure** of your sensitive personal data if we use such personal data to infer characteristics about you.
- **Right to withdraw consent** at any time, where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you opt out, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you opt out.
- **Right to non-discrimination** for exercising any of these rights.

SUBMITTING A CCPA RIGHTS REQUEST

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

You may also authorize another individual or business, called an "authorized agent," to submit rights requests on your behalf. If you wish to have an authorized agent make a verifiable rights request on your behalf, they will need to provide us with sufficient written proof that you have designated them as your authorized agent, and we will still require you to provide sufficient personal data to allow us to reasonably verify that you are the person about whom we collected personal data.

We may have a reason under the law why we are not required to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response.

We will respond to all legitimate rights requests within the timeframe required under applicable law. Note that there are restrictions on the number of times you can exercise some of these rights.

RIGHTS UNDER OTHER LAWS

- **California's "Shine the Light" law:** California law allows California residents to request certain information regarding our disclosure of personal data to third parties for their direct marketing purposes. We do not disclose your personal data to third parties for the purpose of directly marketing their goods or services to you unless you request such disclosure.
- **Nevada residents:** Residents of Nevada have the right to opt-out of the sale of certain personal data to third parties. Currently, we do not engage in such sales.

To opt-out, please see Section 12, below, for ways you may contact us.

12. CONTACT US

If you have any questions, concerns, or if you wish to exercise any of the rights outlined above, please contact us.

Via email: welcome@payden.com

Via phone: (888) 419-4213

Via mail: 333 South Grand Avenue

39th Floor

Los Angeles, CA 90071