

Nasdaq, Inc.

Information Protection and Privacy Practices

As a global technology company and exchange operator, Nasdaq views data as its lifeblood. Accordingly, we are committed to appropriately securing non-public data used as part of our business operations, including information that Nasdaq generates in the performance of its services, and data provided to us by third parties, including customers, vendors, business partners, employees and other stakeholders.

This commitment is reflected in our engrained culture of security, our robust policies and procedures for data systems and processing activities, our mechanisms for monitoring our information systems and data use, the rolebased training that we provide to staff on data protection, and the team of skilled information security and technology professionals who design, protect, and maintain our information systems. Reflecting the unique risks and potential harm posed by mishandling or misuse of personal data, Nasdaq's privacy program builds on the foundation of our information security program to apply special governance, policies, procedures and training on the use, handling and processing of personal data and performance of activities that impact privacy rights (as determined by the jurisdictions in which we operate).

Nasdaq Guiding Principles – Information Protection

As set forth in the Nasdaq Code of Ethics, Nasdaq personnel are expected to protect and secure the confidentiality of non-public information that they receive, access or create in connection with their work at the company. This includes adhering to any laws, regulations and/or non-disclosure agreements that restrict the use of data, require measures to safeguard it, and limit disclosure of information. It also requires that personnel limit their use of information technology assets (e.g., laptops, phones and other devices) to permitted activities so that data is not put at risk, and that they promptly report any suspected improper use or potential disclosure of data.

To support these principles, Nasdaq maintains a comprehensive and consistent set of information security documentation and requirements intended to ensure the security, reliability, integrity, accuracy, confidentiality, and availability of Nasdaq information assets. These documents record the security controls and personnel responsibilities established to protect Nasdaq information and information systems against both accidental and unauthorized access, modification, interference, disclosure, and destruction. These include our Information Security Policies, which apply to personnel (both employees and contractors) working for Nasdaq. Our Information Security Policies establish the following primary requirements:

- Nasdaq information and systems should be protected in a manner commensurate with their sensitivity, value and criticality; protections for information and systems should be maintained in due proportion with applicable and emerging threats.
- Nasdaq information and systems should be used only in an approved, ethical, and lawful manner.
- Nasdaq data should be classified using our internal data classification schema to ensure consistent handling and protection.

Nasdaq Information Security Policies are further supported by detailed Information Security Standards, Information Security Guidelines, and Security Technical Implementation Guides, which each provide greater detailed requirements for specific systems and information technology activities.

Information Protection Best Practices

- **Risk Assessment and Management:** Regularly conducting risk assessments to identify and mitigate potential threats.
- **Data Encryption:** Encrypting sensitive data both in transit and at rest to prevent unauthorized access.
- **Access Control:** Implementing robust access control mechanisms to ensure that only authorized individuals can access sensitive information.
- **Incident Response Planning:** Developing and regularly updating incident response plans to quickly address and mitigate the impact of data breaches.
- **Employee Training and Awareness:** Regularly training employees on information protection policies and practices to reduce the risk of human error.
- **Continuous Monitoring and Auditing:** Implementing continuous monitoring and regular internal and third-party audits to detect and respond to security incidents promptly.

Nasdaq Guiding Principles – Personal Data and Privacy

Nasdaq recognizes that special obligations may attach to situations where it receives or processes personal data as part of its operations. This can extend to data supplied by personnel in connection with their employment or contracted work with Nasdaq, information provided by clients to support their work with Nasdaq or deliver contracted services, or members of the public who wish to receive information or materials that we generate or use publicly available services that we offer.

As set forth in our Code of Ethics and the public-facing Privacy Policy, Nasdaq is committed to respecting and complying with laws and regulations that apply to the collection, use, distribution, destruction, and other processing of personal data. Subject to local legal requirements, personal data encompasses any data about an identified or identifiable individual.

In following the requirement of the Code of Ethics, we expect employees to handle personal data using the “minimum necessary” standard. This means that employees should use such data only as permitted and necessary to our work and disclose such information only to authorized recipients for them to perform their work. In particular:

- Where information is gathered from one of our public websites, employees should adhere to the privacy policy in effect for the site at the time it was collected,
- Employees should comply with contract requirements with customers, suppliers, and others related to processing personal data,
- Employees should adhere to the Global Employee Privacy Policy and European Union Employee Privacy Policy (as applicable) when handling employee data.

When using and storing personal data, employees should secure it in compliance with the Data Classification Policy and other relevant Information Security Policies and Standards as well as contractual requirements.

Personal Data and Privacy Best Practices

- **Data Minimization:** We collect only the data necessary for the intended purpose and retaining it only as long as required.
- **User Consent and Transparency:** We ensure users are informed about data collection practices and obtain their explicit consent, where needed.
- **Anonymization and Pseudonymization:** We implement techniques to anonymize or pseudonymize personal data to protect individual privacy.
- **Data Subject Rights:** We respect and facilitate data subject rights, including the right to access, rectify, and delete personal data (see more information below).
- **Compliance with Regulations:** We adhere to relevant data protection regulations and standards, such as GDPR, CCPA, and HIPAA.
- **Governance:** Nasdaq has a deep foundation in applying strong governance to our business and compliance activities. To ensure accountability and vigilance, we have established executive management structures and board oversight to provide mechanisms for escalating risk, prioritizing actions and providing support to initiatives.
- **Policy and Notice Review:** We are regularly reviewing and updating our company-wide Code of Ethics, information security and privacy policies, as well as privacy related procedures to meet the relevant regulatory developments and case law.
- **Contracting Processes:** We are regularly reviewing and updating our contract templates and terms to include the necessary personal data processing terms.
- **Product Development:** Our Product Development Lifecycle process apply privacy-by-design and default standards and a process for conducting a data protection impact assessment if required.

Privacy Program Controls

Nasdaq has established a robust and mature ongoing privacy compliance program to respond to evolution in law and guidance as well as address changes within our business. The following are some of the key initiatives:

- **Comprehensive Data Processing Assessment and Analysis:** We have established a thorough data mapping of our business systems and processes across our enterprise. Where we identify personal data processing, we assess the basis for processing and evaluate that appropriate technological and organizational measures are in place to protect the data.

Data Subject Rights

Nasdaq respects individuals' ability to exercise their legal rights over their personal data, including, as allowed under applicable law, the right to:

- obtain and correct information,
- have information rectified or deleted,
- object to or restrict the processing,
- lodge a complaint with the supervisory authority,
- right to portability.

Any questions related to our Privacy Program should be directed to dsar@nasdaq.com.

Engagement in Information Protection and Privacy Community

Nasdaq is committed to being an active participant in relevant industry groups and forums related to information security and privacy, so that our programs can stay abreast of risks, industry practices, and emerging trends. We also seek to contribute thought leadership in these areas through active engagement.

We will periodically review this Information Protection and Privacy Practices Statement to reflect our current activities.

This statement reflects Nasdaq's expectations and aspirational standards for its own business. Specific current requirements for conduct are found within relevant provisions the operative Nasdaq Code of Ethics, Employee Handbooks and company policies. The inclusion of a statement in this document does not constitute a representation regarding past or future performance. This statement relates only to Nasdaq's internal business operations only; Nasdaq recognizes that one-size does not fit all and that different standards are appropriate for different companies. Expectations and requirements for Nasdaq listed companies, exchange members and other market participants are found in the applicable rulebooks, published standards and applicable laws and regulations.

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