

BNY Mellon Capital Markets, LLC

October 2008

Policy on the Protection of Social Security Numbers

Like all financial services companies, we collect a variety of information about individuals, including but not limited to our customers and employees. In many cases that information includes individuals' Social Security numbers. We use records of Social Security numbers for many purposes, especially to comply with federal and state laws such as tax laws and anti-money-laundering laws.

Our policy is (i) to comply with all laws restricting the use and disclosure of Social Security numbers, (ii) to protect the confidentiality of Social Security numbers, (iii) to prohibit the unlawful disclosure of Social Security numbers, and (iv) to limit access to Social Security numbers to our employees, and in certain cases to nonaffiliated parties that provide services to us, based on their responsibilities. To safeguard Social Security numbers, we maintain physical, electronic, and procedural safeguards that are designed to comply with applicable legal standards. Our employees are prohibited from disclosing Social Security numbers for unauthorized purposes.

We may share Social Security numbers among our affiliated companies or with nonaffiliated parties for administrative purposes, such as to process transactions, verify identities, and service accounts. We disclose Social Security numbers as required or permitted by law, such as to the Internal Revenue Service or to credit bureaus. When necessary, we disclose Social Security numbers to regulatory agencies, law enforcement agencies, courts, and parties to lawsuits.

We may share Social Security numbers among our affiliated companies for marketing purposes, but only in compliance with legal restrictions, including required opportunities to opt out of such sharing. We do not, without consent of the individual involved, share Social Security numbers with parties not affiliated with us to enable them to market their own products or services.

