



PRIVACY NOTICE

This Privacy Notice (the “Notice”) describes Edgewood’s policies and procedures for collecting and using nonpublic personal information in accordance with applicable privacy and data protection laws. We do not sell your personal information and only share it with third parties as described in this notice.

Edgewood collects personal information, through various means, for the purpose of providing investment advisory services including processing requests and transactions and servicing client accounts. Edgewood only shares such information with non-affiliated third parties or as permitted by applicable law and as stated in this Notice.

Information We Collect. The types and categories of personal information we collect about you include:

- Information we receive from you on applications and other forms to open an account or provide investment advice to you (such as your name, home or business address, social security number, telephone number, and financial information);
- Information that we generate to service your account (such as trade tickets and account statements);
- Information that we may receive from third parties with respect to your account or about your transactions (such as trade confirmations from brokerage firms)

How We Use and Disclose This Information. To provide our advisory services, we may share your information with third parties for a number of purposes including opening an account, processing a transaction or as otherwise required to service your account. Edgewood may provide customer information to third parties as needed to conduct its business and have a need for such information such as a brokers, auditors, and attorneys. We may also share your personal information with government agencies, regulators, private litigants, and law enforcement to comply with our legal obligations including in response to subpoenas or requests for information; in connection with the proposed or actual sale, merger, or transfer of all or a portion of the business; or in the prevention of fraud or other financial crime, or as otherwise permitted by law.

How We Protect Your Personal Information. Edgewood limits the collection and use of personal information to what is necessary to provide advisory services. Edgewood maintains physical, electronic, and procedural safeguards designed to protect customer information. Edgewood requires third party service providers to protect the confidentiality of customer information and to use customer information only for the purposes for which Edgewood discloses the customer information to them. We will retain your personal information for as long as you are a customer and thereafter for as long as is necessary to fulfill our legal and regulatory obligations.

Incident Notification. In the event of an incident involving unauthorized access to or use of your sensitive customer information, we will notify you as soon as practicable, but no later than 30 days after we become aware of the incident. The notice will include a general description of the incident, the type of sensitive customer information that was accessed, the date of the incident, and contact information for you to obtain more information.

Edgewood’s commitment to protecting the security and confidentiality of customer information will continue even after a client terminates the relationship with Edgewood. All Edgewood employees are required to certify annually that they will comply with Edgewood’s policies and procedures to protect the

security and confidentiality of customer information. Edgewood's employees will be subject to appropriate disciplinary action, including dismissal, for knowingly revealing customer information in violation of Edgewood's policies.

Who to Contact with Questions. If you have any questions about this Privacy Notice, please contact Edgewood at (212) 652-9100 or email dataprivacy@edgewood.com.

For California residents:

The California Consumer Privacy Act ("CCPA") grants California residents increased control over their personal data. The CCPA provides you with certain rights in regard to what we do with your personally identifiable information. This section details those rights, how to exercise them, and what Edgewood will do in response.

You have the right to request that we disclose to you, free of charge, the categories and specifics of the customer information we collect about you. We require a verifiable request from you to ensure that it is, in fact, you who is requesting such customer information disclosure. Once the request is appropriately verified, the information will be provided to you.

A request for disclosure can apply to any such customer information mentioned in the previous paragraph for as much as twelve months preceding your request. Be advised that we are not required to disclose such information about the customer information we collect about you more than twice in a twelve-month period.

Subsequent to the verification of your request, we will disclose to you, unless otherwise restricted by law or regulation, the following customer information we collect about you:

1. The categories of personal information we have collected about you.
2. The categories of sources from which the personal information is collected.
3. The business or commercial purpose for collecting or selling that personal information.
4. The categories of third parties with whom we share personal information.
5. The specific pieces of personal information we have collected about you.

The CCPA provides for the right to request deletion of customer information we have collected from you. Unless restricted by law or regulation, Edgewood will comply with such requests and delete applicable customer information subsequent to receipt and verification of such request.

Edgewood does not discriminate against a client exercising rights set forth in this Privacy Notice.

You may contact us by calling (212) 652-9100 or sending an email to dataprivacy@edgewood.com.

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