

# INVESTOR PRIVACY NOTICE

*Last updated: March 14, 2024*

WCM Investment Management, LLC (“WCM”, “We”, “Our”, “Us”) respects your privacy rights. In offering or providing investment management services to you, WCM obtains certain non-public personal information. We recognize the sensitive nature of this information and take appropriate precautions to protect your privacy.

Our policy is to keep this information strictly safeguarded and confidential, and to use or disclose it only as necessary to provide services to you or as otherwise permitted or required by law. We do not sell, rent or trade your information with other companies. We are sharing this Notice with you so you can understand how we use, store, and share your data. We also want you to know your rights with regards to this information and the data we collect about you.

For privacy disclosures concerning your visits to our website or general marketing of our services, please refer to our online privacy policy <https://www.wcminvest.com/privacy-policy>.

**This privacy disclosure applies to all clients, including investors in our funds.**

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## **1. What Types of Personal Information Do We Collect?**

**Information You Give Us.** You may give us information in subscription agreements, investor questionnaires, applications or other forms. You may also provide us information in your correspondence and transactions with us in person, by phone, mail, e-mail or other electronic means. In most cases, you give us this information yourself or through a person you have authorized to share it.

The categories of information include:

- Identifiers, such as name, address, email, telephone number
- Personal information under [California Civil Code section 1798.80](#), such as signature or date of birth.
- Background information, such as information revealed in know-your- customer (KYC) and anti-money laundering (AML) due diligence
- Financial information, such as assets, income, net worth, investment amounts and history, transaction information, tax information, brokerage, custodial arrangements, and family relationships (for family trusts)
- Professional or employment-related information, such as your employer and employment history
- Inferences drawn from any of the above information categories

The categories of sensitive personal information include:

- National identification information, such as social security number, taxpayer identification number, driver's license, passport, or other government identification

**Information We Collect From Third Parties.** We may collect your information from third party service providers, such as broker-dealers, screening companies, investor placement entities, or public databases, who perform services on our behalf or at your request to verify or supplement our information.

## **2. Retention of Information We Collect and Process**

We will only retain your personal information and data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

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

## **3. How Do We Use Personal Information?**

We use your personal information as follows:

- To fulfill your requests for financial and investment products and services offered and subscribed or accepted by you, through any medium of communication
- To enforce our rights or the rights of other persons engaged in carrying out the financial and investment products and services offered and subscribed or accepted by you
- To deliver to you any administrative notices, advice and communications relevant to your use of the products and/or services
- To market our advisory or investment services to you

- For market research, project planning, troubleshooting problems
- For detecting and protecting against error, fraud or other criminal activity

#### **4. How Do We Share Personal Information?**

We may disclose non-public personal information about you that we have collected, only to those persons that provide necessary services to your account or as permitted or required by law or specifically authorized by you. The following discussion identifies categories of persons who may have access to this information.

##### *Within WCM*

WCM employees are permitted access to the information they need to perform their jobs on your behalf. We maintain strict internal policies against unauthorized disclosure or use of client information by employees.

##### *Companies That You Ask Us to Share With*

From time to time, you may request that we provide information to third parties such as financial planners, portfolio consultants, tax advisors or legal counsel. In these cases, WCM will obtain your permission prior to sharing your information with the outside firm. WCM may get your written, online, or verbal permission to share your information. Your consent will apply only to the specific parties you request. If you have previously requested that we block the sharing of your information, that request will remain in place for all other situations, except where required by law.

##### *Outside Service Providers*

We have arrangements with companies whose experience is essential for our advisory services to operate properly. For example, we work with firms that execute securities transactions for us or our clients, custody client assets, provide systems or write software for accounting, compliance and other critical operational functions. These companies work at WCM's direction and only the client information necessary for them to perform these functions is shared. They are required to safeguard your information and only use it for authorized purposes, and within the guidelines established by WCM for the protection of client information. We also work with legal, tax, and accounting advisors for compliance purposes and to enforce our rights or the rights of other persons engaged in carrying out the financial and investment products and services offered and subscribed or accepted by you. These advisors are under professional duties of confidentiality.

##### *Courts and Government Bodies*

Certain federal and state laws may require us to share information about you. For example, if you are involved in a legal matter with a third party, we may be ordered to provide information to a court or other party. In these circumstances, only the specific information required by law,

subpoena, or court order will be shared. The Fair Credit Reporting Act and other laws allow us to share specific details about your transactions and experience with us. The use of this information is limited by federal law to specific permissible purposes, such as applications for credit, insurance or employment. In addition, we may share information with courts, government bodies, and other parties to enforce our rights or the rights of other persons engaged in carrying out the financial and investment products and services offered and subscribed or accepted by you.

## **5. Your Privacy Choices**

We have listed several privacy rights below, but we understand you may have additional rights in your jurisdiction. You may contact us directly at any time about exercising your data protection rights. We will consider your request in accordance with applicable laws.

**Right to Access/ Rectification:** Please contact us if you would like to request a copy of your information or to make any changes to your personal information.

**Marketing Opt-Out:** We may use your personal information to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe instructions provided in any email we send. You will still continue to receive service-related messages concerning products and services you have purchased (unless we have indicated otherwise).

## **6. Safeguarding Your Data**

To protect the personal information of individuals, we permit access only by authorized employees who need access to that information to provide services to us and to you. To guard investors' personal information, we maintain physical, electronic and procedural safeguards that comply with applicable federal and state standards.

Your right to privacy extends to all forms of contact with us, including telephone, written correspondence and electronic media, such as the internet.

## **7. Change of Control**

Personal information may be transferred to a third party as a result of a sale, acquisition, merger, reorganization or other change in control. If we sell, merge or transfer any part of the business, part of the sale may include your personal information.

## **8. Policy Changes**

For current investors, we will provide you with a copy of this Privacy Notice annually. For prospective investors, we encourage you to periodically review this Privacy Notice to ensure you are familiar with the most current version.

## **9. Contact Information**

If you wish to contact us or have any questions about or complaints in relation to this Investor Privacy Notice, please contact us at:

[privacy@wcminvest.com](mailto:privacy@wcminvest.com)

949-380-0200