



PRIVACY NOTICE

Edgewood Management LLC (“Edgewood”) is committed to protecting clients’ nonpublic personal information (“Client Information”). This Privacy Notice (the “Notice”) summarizes our policy regarding the confidentiality and disclosure of Client Information.

Edgewood collects Client Information for the purpose of providing investment advisory services, processing requests and transactions, data storage, and servicing client accounts. Edgewood only shares such information with non-affiliated third parties with your consent or as permitted by applicable law to service your account and as stated in this Notice. Edgewood does not sell Client Information to third parties.

The types and categories of 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)

Edgewood may use Client Information to provide advisory services, to open an account, to process a transaction or otherwise in furtherance of Edgewood’s business. Edgewood limits the collection and use of personal information to what is necessary to provide advisory services. Edgewood may provide Client Information to firms that assist Edgewood in servicing client accounts and have a need for such information such as a broker.

Edgewood maintains physical, electronic and procedural safeguards designed to protect Client Information. Edgewood requires third party service providers to protect the confidentiality of Client Information and to use Client Information only for the purposes for which Edgewood discloses the Client Information to them. Edgewood may disclose Client Information to nonaffiliated third parties as required or permitted by law such as in response to subpoenas or requests for information from government agencies and private litigants, in connection with the proposed or actual sale, merger or transfer of all or a portion of the business, or as otherwise permitted by law.

Edgewood’s commitment to protecting the security and confidentiality of Client 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 Client Information. Edgewood’s employees will be subject to appropriate disciplinary action, including dismissal, for knowingly revealing Client Information in violation of Edgewood’s policies.

In the event you would like to obtain a copy of Edgewood’s policies and procedures regarding the protection of Client Information including its Written Information Security Policy, please contact Edgewood at 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 Client Information we collect about you. We require a verifiable request from you to ensure that it is, in fact, you who is requesting such Client Information disclosure. Once the request is appropriately verified, the information will be provided to you.

A request for disclosure can apply to any such Client 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 Client 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 Client 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 Client Information we have collected from you. Unless restricted by law or regulation, Edgewood will comply with such requests and delete applicable Client 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.