

Privacy Notice

(Effective May 18, 2018)

In offering or providing investment management services to you, WCM Investment Management obtains certain non-public personal information and data about you. 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. Our privacy policy applies equally to everyone who shares this information with us (i.e., clients, former clients, prospective clients, etc.) We are sharing this Notice with you so you can understand the types of information we collect, how we may use, store, under what circumstances we may share it, as well as, the period of time for which your personal data will be stored. We also want you to know your rights with regards to this information and data we collect about you.

Information We Collect, Process and Retain

Collection and Processing of Your Information and Data

Through our process of introducing prospective investors to our firm, or providing management services to clients, or sharing updates about our firm and products, or answering your questions, we collect personal information of various kinds. These include items such as name, address, phone number, email address, tax ID number along with data regarding employment, income, net worth, and family relationships. In most cases, you give us this information yourself or through a person you have authorized to share it. We also receive information about your account assets, transactions and the brokerage and custodial arrangements.

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. We always ensure that a lawful basis exists for all of the personal information and data we collect and process at WCM.

Information We Disclose

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.

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.

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.

How We Safeguard Your Information

We restrict access to non-public personal information and data as described above. We maintain physical, electronic and procedural safeguards to protect the confidentiality of all non-public personal information we have about you.

Transfer of Personal Data

WCM stores personal information and data on servers located in the U.S., which is maintained in accordance with all applicable data protection laws. By submitting personal information and data to WCM and you are outside the U.S., you consent to its transfer for use by WCM and other recipients (such as trusted third parties) described in this notice.

Rights to Your Personal Information

You may update your personal information and data that you provided to us at any time. You also have the right to object to the processing or place restrictions on the processing and sharing of your personal information and data, if permitted by law. This however, could impact whether and to what extent we may provide investment management services to you. You have the right to lodge a complaint against WCM with a supervisory authority. Lastly, you have the right of access to and rectification or erasure of your personal data upon written request.

Contact Us

If you have questions or concerns about our use of the personal information and data you provide, please contact us at privacy@wcminvest.com or 949-380-0200.