

ONLINE PRIVACY POLICY

Last updated: March 20, 2020

WCM Investment Management, LLC (“We”, “Our”, “Us”) respects your privacy rights. This Privacy Policy describes how we collect, use and share the personal data that we gather on our website (www.wcminvest.com and www.wcminvestfunds.com) and in connection with the marketing of our advisory or investment services. For specific privacy disclosures concerning your investment or prospective investment in one or more of our WCM funds, please refer to our <https://www.wcminvest.com/disclosures>.

1. What Types of Personal Information Do We Collect?

Information You Give Us. You may provide us information in your correspondence and transactions with us in person, by phone, mail, e-mail or other electronic means.

The categories of information include:

- Contact information, such as name, address, email, telephone number

Information We Automatically Collect. Like many website operators, we collect information that your browser sends whenever you visit our website. This Log Data may include information such as your computer’s Internet Protocol (“IP”) address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics. This information may be collected via several technologies, including cookies, such as Google Analytics.

You can control cookies in your browser to enable or disable them. Learn more in our Cookie Policy below.

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

3. How Do We Use Personal Information?

We use your personal information as follows:

- To fulfill your requests for information regarding our financial and investment products
- To deliver to you any communications relevant to your consideration of the products and/or services
- To market our advisory or investment services to you on our website
- To analyze website usage and improve the services offered
- 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?

Affiliates and Service Providers. We share your information with our subsidiaries, affiliates, third-party service providers, and/or any subcontractors as required to offer you our products and services. Any party who we disclose information to is required to maintain confidentiality and only use your personal information to perform services.

Third Party Links and Websites. Our Site and/or App may contain links to and from the websites of third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any data to these websites.

Disclosures Required by Law. We may be required to disclose your data in response to lawful requests by public authorities, including to meet law enforcement requirements. We may be under a duty to disclose or share your personal data in order to comply with any legal obligation, to enforce or apply our terms and conditions and other agreements, to protect our rights, property, or safety, or to protect the rights, property, or safety of others. This includes exchanging information with other companies and organizations for the purposes of fraud protection.

5. How Do We Respond to ‘Do Not Track’ Signals?

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. DNT is a way for users to inform websites and services that they do not want certain information about their webpage visits collected over time and across websites or online services. We do

not recognize or respond to browser-initiated DNT signals, as the Internet industry is currently still working toward defining exactly what DNT means, what it means to comply with DNT, and a common approach to responding to DNT.

6. Cookie Policy

Google Analytics. We use Google Analytics. We use the information we get from Google Analytics only to improve this site. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Please refer to Google's [Privacy Policy](#) for more information. You may also choose to download the [Google Analytics opt-out browser add-on](#).

7. Your Privacy Choices

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).

California Disclosures

Request for Information. California consumers have the right to request, up to twice in a 12-month period, that a business that collects personal information about the consumer disclose to the consumer the information listed below for the preceding 12 months. We have the right to request verification of your identity for all requests for information.

- (1) The categories of personal information it has collected about that consumer.
- (2) The categories of sources from which the personal information is collected.
- (3) The business or commercial purpose for collecting or selling personal information.
- (4) The categories of third parties with whom the business shares personal information.
- (5) The categories of personal information that the business sold about the consumer and the categories of third parties to whom the personal information was sold, by category or categories of personal information for each third party to whom the personal information was sold.
- (6) The categories of personal information that the business disclosed about the consumer for a business purpose.
- (7) The specific pieces of personal information it has collected about that consumer.

To make such a request, please contact us at the contact information below.

Do Not Sell My Personal Information. We do not sell, rent or trade your information with other companies.

Third Party Marketing. California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information to third parties for the third parties' direct marketing purposes. We do not disclose your personal information to third parties for the third parties' direct marketing purposes.

EEA/ UK Disclosures

Right to Object to Processing. You 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.

Automated Processing. WCM does not use automated processing/ profiling of an individual in order to make investment decisions on their behalf, e.g. automated scoring based on background checks.

Complaints. You have the right to lodge a complaint against WCM with a local supervisory authority.

8. Legal Bases for Processing (EEA and UK)

If you are from the European Economic Area or the United Kingdom, our legal bases for collecting and using your Personal Information is as follows:

- The processing is necessary in order to take steps at your request prior to entering into a contract.
- Our legitimate business interests. For example, fraud prevention, maintaining the security of our network and services, direct marketing to you, and improvement of our services.
- Compliance with a mandatory legal obligation. For example, accounting and tax requirements, which are subject to mandatory retention periods. We may also collect your Personal Information to record your requests to exercise your rights and to verify your identity for such requests.
- Consent you provide where we do not rely on another legal basis. Consent may be withdrawn at any time.
- In some limited cases, we may also have a legal obligation to collect Personal Information from you, in response to lawful requests by public authorities, including to meet law enforcement requirements, as described above in "How Do We Share Personal Information?"

If you have questions about or need further information concerning the legal basis on which we collect and use your Personal Information, please contact us using the contact details provided in the "Contact Information" section below.

9. International Transfers of Data

Any data that you provide to us may be accessed, shared or processed by our offices, located in the United States, and service providers located in the United States, if such data transfer is necessary for the specific purpose for which you submitted your data (such as the provision of goods or services under a written contract).

This may entail a transfer of your personal information across international borders. The data protections standards may differ and be lower than the standards enforced in your jurisdiction.

We maintain appropriate safeguards as required by applicable law for any personal information transferred internationally, and as required by applicable law, will seek your consent prior to such transfers.

10. Children's Privacy

This Site is not directed at individuals under the age of 16. We do not knowingly collect personal information from children under 16. If you become aware that a child has provided us with personal information, please contact us at the contact information below. If we become aware that a child under 16 has provided us with personal information, we will take steps to delete such information.

11. 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.

12. 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.

13. Policy Changes

We may change our Privacy Policy at any time. We encourage you to periodically review this Privacy Policy to ensure you are familiar with the most current version.

14. Contact Information

If you wish to contact us or have any questions about or complaints in relation to this Privacy Policy, please contact us at the following contact details:

privacy@wcminvest.com

949-380-0200

www.wcminvest.com