



INVESTMENT MANAGEMENT

WCM Investment Management Privacy Notice

Our Privacy Policy. In managing your account, WCM Investment Management obtains certain nonpublic personal information 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 any Client information to other companies. Our privacy policy applies equally to former clients of our firm and individuals who inquire about our services. We are required to provide our clients with a document illustrating the types of information we collect and the circumstances under which we may share it. This policy statement takes the place of any previous privacy policy issued by WCM.

Information We Collect. “Nonpublic personal information” is personally identifiable financial information about you as an individual or your family. The kinds of nonpublic personal information we have about you includes the information you give us when you open your account with us or when we discuss your account with you, such as your name, address, telephone number, Social Security number, your employment, income, assets, family, and personal financial situation and your investment objectives. In most cases, you give us this information yourself, in person or by mail. We also have information about your account assets and transactions and the brokerage and custodial arrangements for your account.

Information We Disclose. We disclose nonpublic personal information about you 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.

Former Clients

We may share information about former clients with third parties as described above. However, former clients can also elect not to have their information shared, even after their relationship with us ends.

How We Safeguard Your Information. *We restrict access to nonpublic personal information as described above. We maintain physical, electronic and procedural safeguards to protect the confidentiality of all nonpublic personal information we have about you.*

How WCM Uses Email

WCM also uses email to communicate with you. However, WCM will never send emails asking for personal or account information, such as passwords, Social Security numbers, or PINs. WCM will always protect your privacy in a manner that is consistent with the principles outlined in this policy.

If you have any questions regarding our Privacy Policy, please contact us at (949) 380-0200.