

When used in this Privacy Notice, the terms “we,” “our” and “us” mean Goldberg Capital Management. When we use the words “you” and “your” we mean our current and former individual investment advisory clients and fund investors.

Our Privacy Policy

We recognize that safeguarding Personal Information (as such term is defined in the following section) about our clients and investors is an essential commitment we make and trust we hold. In this regard, we have adopted certain policies and procedures concerning the use of Personal Information about our clients and investors. These policies and procedures govern the activities of our firm and our employees and strictly limit our ability to use or distribute Personal Information about you. This Privacy Notice identifies the Personal Information we collect and hold, and describes how we use, share and secure such information.

Some Useful Definitions

In this Privacy Notice, the term:

“Affiliate” means a company that we own or control, a company that owns or controls us, or a company that is owned or controlled by the same company that owns or controls us.

“Nonaffiliated Third Party” means a company that is not an affiliate.

“Personal Information” means nonpublic personal information about you that we collect in connection with providing a financial product or service to you. Personal Information includes all the information set forth in the following section, but does not include information that is available from public sources, such a telephone directories or government records.

Why and How We Collect Personal Information

We collect Personal Information about you to:

- Accurately identify you;
- Protect and administer you records, accounts and funds;
- Help us evaluate your financial needs;
- Process your requests and transactions; and
- Comply with certain laws and regulations.

The categories of Personal Information we collect from you depends upon the scope of our advisory relationship with you. In the course of providing services to you, we may collect the following types of Personal Information about you:

- Information we receive from you on applications and other forms, such as your name, address, social security number, the types and amounts of investments and bank account information;

- Information you provide to us orally;
- Information you direct or authorize us to obtain from third parties, such as investment, legal and insurance advisers or brokerage houses, banks and asset custodians; and
- Information that we generate to service your account or from our transactions with you, our affiliates and others, such as account statements and other financial information.

How We protect Your Personal Information

People. We educate our employees to treat Personal Information with care and work to limit access to this information to individuals who need it to perform their jobs, such as to conduct our business, service your account or help you pursue your financial objectives. Employees who have access to your Personal Information are required to maintain and protect the confidentiality of that information.

Procedures. In compliance with applicable laws and regulations, we maintain physical, electronic and procedural safeguards to protect your Personal Information.

Security. We take such security measures as we deem appropriate to keep Personal Information confidential and secure against unlawful processing and to prevent loss, destruction or damage.

Guidelines for Disclosing Information

We do not sell or rent your Personal Information, nor do we provide your Personal Information to mailing list vendors or solicitors for any purpose. We do not disclose, nor do we reserve the right to disclose, any Personal Information about you to anyone, except as permitted or required by law. For example, we are occasionally required to provide Personal Information to comply with investigations by regulatory authorities or law enforcement agencies or to protect against or prevent actual fraud or potential fraud, unauthorized transactions, claims or other liabilities.

We also may provide Personal Information to individuals authorized by you, such as your attorney, accountant, and insurance agent. In addition, we are permitted to provide Personal Information, such as your name, address and transaction history, to:

- (a) Affiliates as reasonably needed to provide you with investment advisory services; and
- (b) Companies who are authorized service providers that assist us with a variety of business activities and who need this information to perform services for us in connection with your account and our financial products and services.

These services include:

- Account administration;
- Research and analysis;

- Data processing;
- Computer software maintenance and development;
- Transaction processing; and
- Marketing services.

All companies with whom we do business are contractually obligated to comply with strict standards regarding the security and confidentiality of your Personal Information. The Personal Information provided to such companies can only be used for the sole purpose of providing the service we have requested the company to perform.

Accuracy of Personal Information

We endeavor to keep our records of your Personal Information current and complete. If you become aware of any discrepancies in your Personal Information, please notify us and we will make the necessary corrections.

Ongoing Commitment

Clients and investors will receive a current copy of our Privacy Notice on an annual basis. We hope that this information is useful to you. Confidentiality is the key to a strong relationship and we are committed to protecting your privacy.

Former Clients and Investors

We do not disclose Personal Information about former clients and investors, except as permitted or required by law.