

Brown Capital Management 2022 Privacy Notice

FACTS	WHAT DOES BCM DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> • Social Security number and assets • Account balances and transaction history • Wire transfer instructions and risk tolerance <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
How?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons BCM chooses to share; and whether you can limit this sharing.

Reasons we can share your information	Does BCM share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, and credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	No	We don't share
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes – information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes – information about your creditworthiness	No	We don't share
For nonaffiliates to market to you	No	We don't share

Questions?

Call: (410) 837-3234 or Email: Compliance@browncapital.com

What we do

How does BCM protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does BCM collect my personal information?

We collect your personal information, for example, when you:

- Open an account or seek advice about your investments
- Make a wire transfer or direct us to buy securities
- Enter into an investment advisory contract

Can I limit all sharing?

Federal Law gives you the right to limit only

- sharing for affiliates' everyday business purposes – information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Who are our affiliates

Does BCM have any affiliates with access to my personal information?

BCM is a majority owner of Commonwealth Fund Services (CFS), a full-service, fund accounting, transfer agency and shareholder-services firm in Richmond, VA. BCM does not share its institutional or retail client information with CFS.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *BCM does not share with non-affiliates so they can market to you.*

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *BCM does not participate in joint marketing.*