

Bridgeway Capital Management, LLC
California Consumer Privacy Act Disclosure for California Residents
April 20, 2023

This **Privacy Notice for California Residents** (“**CA Privacy Notice**”) supplements the information contained in the Privacy Policy of Bridgeway Capital Management, LLC (“**Bridgeway**”) <https://bridgeway.com/wp-content/uploads/2021/10/BCM-Privacy-Policy-20211011.pdf> (the “**Privacy Policy**”) and only applies to residents of California.

This CA Privacy Notice explains how Bridgeway collects, uses, and discloses Personal Information relating to California residents that is subject to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “**CCPA**”), related regulations, and other California privacy laws.

What is Personal Information?

“Personal Information” as the term is defined in the CCPA, means information that relates to, describes, references, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household. Personal Information would generally not include information that has been de-identified or is in an aggregated form.

The CCPA does not apply to certain Personal Information including Personal Information that is collected, processed, sold or disclosed subject to the federal Gramm-Leach-Bliley Act and implementing regulations (“**GLBA**”), which applies to the privacy practices of financial institutions like investment advisers. As a result, many of the rights granted by the CCPA do not apply with respect to Personal Information subject to the GLBA, such as Personal Information that we collect about California residents who are investment advisory clients of Bridgeway or who request or obtain information on financial products or services from us for personal, family or household purposes. This may include Personal Information that is defined as “Sensitive” under CCPA. Please note that we only use the information we collect that meets the definition of Sensitive Personal Information under CCPA for which it was provided, and such information is not collected or processed for the purpose of inferring additional characteristics. The CCPA may also not apply where a financial institution shares your Personal Information with us, as that information could be subject to and protected by the GLBA.

Information We Collect

We collect Personal Information as described in our Privacy Policy <https://bridgeway.com/wp-content/uploads/2021/10/BCM-Privacy-Policy-20211011.pdf>.

Sharing Personal Information. Within the last 12 months, the Personal Information we have obtained on California residents includes the items listed in the chart below. This list may not be applicable to you; however, the list represents the types of Personal Information we have received during ordinary business.

Category	Examples	Collected	Business Purpose Disclosures
A. Identifiers.	A real name, alias, postal address, unique personal	YES	NONE

	<p>identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.</p>		
<p>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</p>	<p>A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.</p> <p>Some Personal Information included in this category may overlap with other categories.</p>	YES	NONE
<p>C. Protected classification characteristics under California or federal law.</p>	<p>Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).</p>	YES	NONE
<p>D. Commercial information.</p>	<p>Records of personal property, products or services purchased, obtained,</p>	NO	N/A

	or considered, or other purchasing or consuming histories or tendencies.		
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO	N/A
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	NONE
G. Geolocation data.	Physical location or movements.	NO	NONE
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information, such as call and video recordings.	YES	NONE
I. Professional or employment-related information.	Current or past job history or performance evaluations.	NO	N/A
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO	N/A

K. Inferences drawn from other Personal Information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO	N/A
L. Sensitive Personal Information	Social Security, driver's license, state identification card or passport number; account log-in, financial account, debit card or credit card number in combination with any required security or access code, password or credentials allowing access to the account; precise geolocation; racial or ethnic origin, religious or philosophical beliefs; union membership; or genetic data; contents of mail, email, and text messages unless we are the intended recipient of the communication; the processing of biometric information for the purposes of uniquely identifying a consumer; information collected and analyzed concerning a consumer's health, sex life, or sexual orientation.	Yes	None

Retention of Your Personal Information

Bridgeway retains each category of Personal Information described above based on multitude of factors including, without limitation, the data subjects' relationship with us, the nature and sensitivity of the information collected, and our data retention compliance obligations. Bridgeway will not retain any Personal Information for longer than is necessary to accomplish the business purposes for which the information was collected.

No Sale of Personal Information

Bridgeway has not sold any Personal Information related to California Residents or shared it for any cross-context behavioral marketing purposes within the previous 12 months and will not sell any Personal Information.

Disclosure of Personal Information

We have disclosed the categories of Personal Information listed above in this CA Privacy Notice for the business purposes specified below. For more information regarding how Personal Information is shared, please review “Disclosure of Your Information” in Bridgeway’s Privacy Policy <https://bridgeway.com/wp-content/uploads/2021/10/BCM-Privacy-Policy-20211011.pdf>.

Use of Personal Information

We collect the Personal Information listed in this CA Privacy Notice for the following business purposes all of which are reasonably necessary and proportionate to achieve the purpose for which the personal information was collected or processed:

- To complete the investment transaction for which the information was provided.
- To create, maintain, customize, and secure your account with us; to complete any account changes that you direct; and to provide you with notices and other disclosure documents related to your account, such as our Form ADV Brochure.
- To provide your account with support and to respond to any inquiries you may have, including to investigate and address your concerns and monitor and improve our responses.
- To communicate with you about other financial products that we offer.
- To provide, support, personalize, and develop our Website and other financial products and services.
- To perform identity verification and detect and prevent fraud.
- To help maintain the safety, security, and integrity of our Website, products and services, databases and other technology assets, and business.
- For testing, research, analysis, and product development, including to develop and improve our Website, products, and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your Personal Information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, reorganization, dissolution, or other sale or transfer of some or all of our assets.

We will not collect additional categories of Personal Information or use Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Your California Rights and Choices

If you are a California resident, you have certain rights regarding your Personal Information. This section describes those rights and explains how to exercise those rights.

Access to Specific Information and Data Portability Rights

You have the right to request that we disclose, free of charge, the following about our collection and use of your Personal Information over the past 12 months:

- The categories of Personal Information we collected about you.
- The categories of sources for the Personal Information we collected about you.
- Our business or commercial purpose for collecting that Personal Information.
- The categories of third parties with whom we share that Personal Information.
- The specific pieces of Personal Information we collected about you (also called a data portability request).

Correction of Inaccurate Personal Information Rights

You have the right to request Bridgeway to correct any inaccurate Personal Information that Bridgeway maintains about you, considering the nature of the Personal Information and the purposes of the processing of that Personal Information.

Deletion Request Rights

You have the right to request that we delete any of your Personal Information that we collected from you, subject to certain exceptions permitted by the CCPA. For example, we may deny your deletion request for such reasons, including but not limited to, retaining any information necessary for us to complete the transaction for which we collected the Personal Information, providing a service that you requested, taking actions reasonably anticipated within the context of our ongoing business relationship with you, detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, or prosecuting those responsible for such activities; or complying with a legal obligation.

Non-Discrimination Rights

Bridgeway may not discriminate against you because you have exercised any of your rights under the CCPA, including:

- Denying you goods or services.
- Charging you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Providing you a different level or quality of goods or services.
- Suggesting that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

Bridgeway may, however, charge different prices or offer different rates, or a different quality or level of goods or services, if that difference is reasonably related to the value provided to Bridgeway by your Personal Information.

Exercising Access, Data Portability, Correction, and Deletion Rights

To exercise the rights listed above, contact us at:

Bridgeway Capital Management, Inc.
20 Greenway Plaza
Suite 450
Houston, TX 77046
info@bridgeway.com

or via our toll-free number:

800-661-3550

Only you, or someone legally authorized to act on your behalf, may make a request related to your Personal Information. You may also make a verifiable consumer request on behalf of your minor child.

When you make a request, Bridgeway may take steps to verify your identity before responding to your request. Accordingly, Bridgeway may take any or all of the following steps:

- Require you to provide sufficient information to allow us to reasonably verify you are the person about whom we collected Personal Information.
- Utilize our normal verification processes for our existing products and services based on your existing relationship with Bridgeway.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm the Personal Information relates to you. We may also decline to honor your request where the Personal Information that we maintain about you is not subject to the CCPA's access and or deletion rights.

As described by CCPA and its regulations, you may designate an authorized agent to make a request on your behalf. You may make such a designation by providing the agent with written permission to act on your behalf. As permitted by law, we may take steps to verify your own identity in response to a request even if you choose to use an agent.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. Please note, we may refuse to act on your request if such request is manifestly unfounded or excessive.