

Bridgeway Capital Management, LLC

Privacy Policy Notice

February 24, 2025

As an investment adviser, Bridgeway Capital Management, LLC (“Bridgeway”) invests the assets of its clients. On behalf of Bridgeway, we make the following assurances regarding your privacy.

Bridgeway's Commitment to You

We work hard to respect the privacy of your personal and financial data.

Not Using Your Personal Data for our Financial Gain

Bridgeway has never sold client information to any other party, nor have we disclosed such data to any other organization, except as permitted by law. We have no plans to do so in the future. We will notify you prior to making any material change to this policy.

How We Use Your Personal and Financial Data

We use your information primarily to complete your investment transactions. We may also use it to communicate with you about other financial products that we offer.

The Information We Collect From You

You typically provide personal information when you open an account with Bridgeway or when you request transactions within your account. This information may include your:

- Name, address and phone numbers
- Social security or taxpayer identification number
- Birth date and beneficiary information
- Basic trust document information (for trusts only)
- Account balances and bank account information
- Investment activity

How We Share Your Personal Information

As emphasized above, we do not sell information about current or former clients or their accounts to third parties. We occasionally share such information to the extent permitted by law for limited purposes as set forth below.

- To complete certain transactions or account changes that you direct, it may be necessary to provide identifying information to companies, individuals, or groups that are not affiliated with Bridgeway. For example, if you ask to transfer assets from another financial institution to Bridgeway, we will need to provide certain information about you to that company to complete the transaction you requested.
- In certain instances, we may contract with non-affiliated companies to perform services for us, such as proxy voting or to make you aware of related financial products that we offer. Where necessary, we will disclose information about you to these third parties. In all such cases, we provide the third party with only the information necessary to carry out its assigned responsibilities and only for that purpose. We prohibit these third parties from disclosing or using the disclosed information for any purpose other than to carry out the specific purpose(s) for which we disclosed the information to them. In addition, we contractually require these third parties to treat your private information with the same high degree of confidentiality that we do.
- Finally, we will release information about you if you direct us to do so, if we are compelled by law to do so, or in other legally permitted circumstances (for example, to protect your account from fraud).

How We Safeguard Your Personal Information

To protect your personal information from unauthorized access and use, we use security measures that comply with the federal law. These measures include physical, electronic, and procedural safeguards to protect your personal information such as computer safeguards and secured files and buildings. We restrict access to your information to those Bridgeway representatives who need to know the information to provide products or services to you.

Custodians

All Bridgeway client assets are custodied at a third -party custodian. Please contact those firms for their own policies with respect to privacy issues.

We'll Keep You Informed

If we materially change our privacy policy with regard to the handling of your confidential information, we are required by law to notify you and will provide you with a revised notice. Please do not hesitate to contact us with questions about this notice.