

Bridgeway Capital Management, LLC
California Consumer Privacy Act Disclosure for California Residents
February 16, 2026

This **Privacy Notice for California Residents** (“CA Privacy Notice”) supplements the information contained in the Privacy Policy Notice of Bridgeway Capital Management, LLC (“Bridgeway”) <https://bridgeway.com/wp-content/uploads/2021/10/BCM-Privacy-Notification-2025.02.24.pdf> (the “Privacy Policy”) and only applies to residents of California who are or may become investment advisory clients of Bridgeway (“CA Residents”).

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, as applicable.

What is Personal Information?

“Personal Information” as the term is defined in the CCPA, means information that identifies, relates to, describes, 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 consumer 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 including investment advisers such as Bridgeway. 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 or may become 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 Personal Information” under the CCPA. Please note that we only use or disclose the information we collect that meets the definition of “Sensitive Personal Information” under CCPA for purposes for which it was provided and as otherwise specified in Section 7027(m) of the implementing regulations of the CCPA and it is not used for the purpose of inferring characteristics about you. 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 may collect Personal Information from you in a variety of different situations as shown in the chart below. We collect Personal Information as described in our Privacy Policy Notice <https://bridgeway.com/wp-content/uploads/2021/10/BCM-Privacy-Notification-2025.02.24.pdf>.

Within the last 12 months, we have obtained certain of the Personal Information items listed in the chart below for California Residents. This list may not be directly applicable to you; however, the list represents the types of Personal Information we have received about California Residents during the ordinary course of business. The list also explains whether each category of information has been disclosed to a third party for a business purpose, and the third parties to whom such information has been disclosed.

Categories	Examples	Categories of Sources From Which We Collect Personal Information	Collected in Last 12 Months?/ Disclosed For a Business Purpose?	Categories of Third Parties to Whom We Disclose Personal Information For a Business Purpose
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	From your mobile device	YES/YES	Service Providers
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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	From you	YES/YES	Service Providers

	<p>information, or health insurance information.</p> <p>Some Personal Information included in this category may overlap with other categories.</p>			
C. Protected classification characteristics under California or federal law.	<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>	From you	YES/NO	NONE
D. Commercial information.	<p>Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.</p>	From you	YES/NO	NONE
E. Biometric information.	<p>Genetic, physiological, behavioral, and biological</p>	From you	YES/YES	Service Providers

	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.			
F. Internet or other electronic network activity.	Browsing history, search history, and information on a consumer's interaction with a website, application, or advertisement.	From your mobile device	YES/NO	NONE
G. Geolocation data.	Physical location or movements.	From your mobile device	YES /NO	NONE
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information, such as call and video recordings.	From you	YES/NO	NONE
I. Professional or employment-related information.	Current or past job history or performance evaluations.	Not Applicable	NO/NO	NONE
J. Non-public education information (per the Family Educational	Education records directly related to a student maintained by an educational institution or party acting on its behalf,	Not Applicable	NO/NO	NONE

<p>Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).</p>	<p>such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.</p>			
<p>K. Inferences drawn from other Personal Information.</p>	<p>Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.</p>	<p>Not Applicable</p>	<p>NO/NO</p>	<p>NONE</p>
<p>L. Sensitive Personal Information</p>	<p>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</p>	<p>From you</p>	<p>YES/YES</p>	<p>Service Providers</p>

	<p>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.</p>			
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Retention of Your Personal Information

Bridgeway retains Personal Information described above for as long as necessary to accomplish the business purposes set out in this CA Privacy Notice for which the information was collected, based on several factors including, without limitation, your relationship with us, the nature and sensitivity of the information collected, and our data retention compliance obligations. Bridgeway may retain Personal Information for additional time as required by applicable law: to establish, exercise or defend our legal rights; or, for other business purposes, including archiving and historical purposes.

No Sale or Sharing of Personal Information

Bridgeway has not “sold” or “shared” any Personal Information related to California Residents, as such terms are defined by the CCPA, for any cross-context behavioral marketing purposes within the previous 12 months and does not sell or share any Personal Information. Bridgeway does not have actual knowledge that it sells or shares the Personal Information of consumers under 16 years of age.

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 of such collection or use.

Disclosures of Personal Information for a Business Purpose

In the last 12 months, we have disclosed the categories of Personal Information listed above in this CA Privacy Notice to its service providers for the following business purposes:

- 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 prospectuses, proxy materials, and shareholder reports.
- To provide your account with support and respond to any inquiries you may have, including investigating and addressing your concerns and monitoring and improving our responses.
- To communicate with you about other financial products that we offer.
- To support, personalize, and develop our Website and 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 developing and improving our Website, products, and services.
- To respond to law enforcement and regulatory requests and as required by applicable law, court order, or governmental regulations.
- To evaluate or conduct a merger, reorganization, dissolution, or other sale or transfer of some or all of our assets.

- To notify you about changes to this policy.
- As otherwise permitted by law, such as for purposes as described to you or with your consent.

For more information regarding how Personal Information is disclosed, please review “How We Do Use Your Information” in Bridgeway’s Privacy Policy Notice <https://bridgeway.com/wp-content/uploads/2021/10/BCM-Privacy-Notification-2025.02.24.pdf>

Your California Rights and Choices

As a California resident, you have certain rights regarding your Personal Information that are not already protected by existing federal privacy laws. 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(s) for collecting that Personal Information.
- The categories of Personal Information that we disclosed for a business purpose and the categories of third parties with whom we disclosed that Personal Information.
- The specific pieces of Personal Information we collected about you (also called a data portability request). Please note that the CCPA requires that we omit certain sensitive information when responding to a verified request to know. If you request such sensitive information, we will inform you with sufficient particularity that we have collected the type of information.

Correction of Inaccurate Personal Information Rights

You have the right to request that Bridgeway correct 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.

Limiting Use and Disclosure of Sensitive Personal Information Rights

You have the right to limit how a covered business uses and discloses your “Sensitive Personal Information,” as such term is defined by the CCPA. Please note that we only use or disclose your Sensitive Personal Information for purposes as specified in Section 7027(m) of the implementing regulations of the CCPA and not for the purpose of inferring characteristics about you.

Deletion Request Rights

You have the right to request that we delete 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 your Access, Data Portability, Correction, and Deletion Rights

To submit a request to know, correct, or delete your Personal Information, you may 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 to know, correct, or delete Personal Information, Bridgeway will 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, correction 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

If you submit a request to know, correct, or delete your Personal Information, we will confirm receipt of your request no later than ten (10) business days from its receipt. We endeavor to respond to a verifiable consumer request within forty-five (45) calendar 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.

Contact for More Information

To ask questions or make comments about this CA Privacy Notice, Bridgeway's privacy practices, or to exercise any of your data rights listed above, you may contact us at:

Bridgeway Capital Management, Inc.
20 Greenway Plaza
Suite 450
Houston, TX 77056
info@bridgeway.com

or via our toll-free number:

800-661-3550