



2121 N. California Blvd., Suite 830, Walnut Creek, CA 94596 T: 925-587-5075 F: 925-835-7075

FACTS

WHAT DOES PRIME MERIDIAN CAPITAL MANAGEMENT, LLC 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?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- **Social Security Number** and **Income**
- **Investment Experience** and **Assets**
- **Employment Information** and **Risk Tolerance**

When you are *no longer* our customer, we continue to share your information as described in this notice.

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 Prime Meridian Capital Management chooses to share; and whether you can limit this sharing.

| Reasons we can share your personal information | Does Prime Meridian Capital Management 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, report to 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 non-affiliates to market to you | NO | We don't share |

Questions?

Call **925-587-5075** or go to **www.pmifunds.com**

Who we are

Who is providing this notice?

Prime Meridian Capital Management, LLC

What we do

How does Prime Meridian Capital Management 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.

We maintain safeguards that comply with federal standards to protect nonpublic personal information of our customers, including procedures to assure appropriate access to, and use of, information about our customers.

How does Prime Meridian Capital Management collect my personal information?

We collect your personal information, for example, when you

- **Seek advice about your investments** or **Enter into an investment advisory contract**
- **Show your driver's license** or **Give us your contact information**
- **Tell us about your investment or retirement portfolio**

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

Why can't 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.

Definitions

Affiliates

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

- ***Prime Meridian Capital Management does not share with our affiliates.***

Non-affiliates

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

- ***Prime Meridian Capital Management 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.

- ***Prime Meridian Capital Management does not jointly market.***

Other important information



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European Union General Data Protection Regulation Privacy Notice

This Privacy Notice describes how Prime Meridian Capital Management, LLC (“we”, “us”, the “Company”) treats personal data of individuals in the European Economic Area (EEA). The information in this Notice is provided pursuant to the European Union’s General Data Protection Regulation (GDPR) with regard to us acting as a data controller.

Our Data Protection Officer can be reached at (925) 587-5075. Contacting us through other means could impact your rights and our obligations under the GDPR.

Basis for and Purposes of Data Processing

We collect and process your personal data when processing is necessary for the performance of our contract with you or your designee.

We also process your personal data in order to comply with applicable U.S. laws. Basis for such processing are our legitimate interests, as we could not provide you with the required services unless we complied with U.S. laws.

Personal Data Not Obtained From You

We obtain personal information about you from other sources, including those publicly accessible, in order to assist us in verifying your identity, and for anti-money laundering purposes.

Recipients of Personal Data

We share your personal data with unaffiliated service providers to help conduct our business, and these arrangements are subject to data protection agreements.

International Transfers

We are based in the U.S. (a country for which the EEA has not issued an adequacy decision on the protection of personal data). Data transfers to U.S. companies are necessary for the performance of our contract with you.

Data Storage Period

We process and store personal data for as long as is required to provide services, which is typically for the duration of our contract with you or your designee. The criteria used to determine extended data storage (such data will be kept confidential, unless otherwise required by law) depend on our responsibilities as a financial institution to comply with regulatory and legal requirements, along with corporate standards, prevent fraud and market abuse, and maintain cyber and information security and privacy protections, as well as data integrity and system controls.

Your GDPR Rights

You can exercise or address these rights (subject to retention and other requirements under applicable law) by contacting our Data Protection Officer identified in the beginning of this Notice.

1. **Access.** You have the right to obtain access to your personal data.
2. **Rectification.** You have the right to ask for incorrect, inaccurate, or incomplete personal data to be corrected.
3. **Erasure.** You have the right to request that personal data be erased.
4. **Restriction on processing.** You have the right to request the restriction of the processing of your personal data in specific cases.
5. **Objection to processing.** You have the right to object to the processing of your personal data for marketing purposes or on grounds relating to your particular situation.
6. **Portability.** You have the right to receive your personal data in a machine-readable format and send it to another controller.
7. **Lodging a complaint with a Supervisory Authority.** You have the right to lodge a complaint with a Supervisory Authority within your Member State.