

Privacy Policy
GOTHAMFUNDS.COM

Privacy Policy

Last modified July 20, 2018.

We respect your privacy and are committed to protecting it through our compliance with this policy. This policy describes the types of information we may collect from you or that you may provide when you use the GOTHAMFUNDS.COM website, including the information submission and registration features included on the website (the "Website"), and our practices for collecting, storing, using, maintaining, protecting and disclosing that information. Please read this policy carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with those policies and practices, you may choose not to access the Website. By accessing the Website, you agree to this privacy policy. This policy may change from time to time (see "Changes to the Privacy Policy" below). Your continued access of the Website after we make changes will constitute your acceptance of those changes, so please check the policy periodically for updates. This policy applies to information we collect about you in connection with your use of the Website. This privacy policy does not reflect the privacy practices of any third party websites to which links or references may be included on the Website.

USERS UNDER THE AGE OF 18

The Website is not intended for access or use by, and we do not knowingly collect personal information from, users under 18 years of age. If you are under 18 years of age, do not access, use or provide any information on the Website, including completing the online registration it includes, or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use. If you believe we might have any information from or about a child under 18 years of age, please contact us at gothamfunds@gotham.com.

USERS OUTSIDE THE UNITED STATES

The Website is not intended for access or use by, and we do not knowingly collect personal information from, users residing outside of the United States. If you reside outside of the United States, do not access, use or provide any information on the Website, including completing the online registration it includes, or provide any information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or user name you may use.

INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

We collect several types of information from and about you in connection with your access and use of the Website, potentially including (i) information by which you may be personally identified, such as name, postal address, e-mail address, domain name, telephone number or any other information input as part of the online registration process that is defined as personal or personally identifiable information under applicable law, (ii) information regarding your use of the Website, including browsing activity, and (iii) information about the computing environment you use to access the Website. We collect this information either directly from you when provide it to us as part of the online registration process or through other means of information submission, or automatically as you access the Website (including usage details, IP addresses and other information obtained through tracking technologies).

INFORMATION YOU PROVIDE TO US

The information we collect from you includes (i) information that you provide when completing the online registration process, (ii) information contained in correspondence (including e-mail addresses) with us and

(iii) information gathered when you interact with our personnel for any purpose, including reporting a problem with or difficulty using the Website.

INFORMATION WE COLLECT THROUGH AUTOMATIC DATA COLLECTION TECHNOLOGIES

As you use the Website, we may use automatic data collection technologies to collect certain information about your computing environment, browsing activity and patterns, including (i) details of your use of the Website, including which portions of the Website you access, usage patterns related to your access of the Website, information regarding referring websites or search engines, traffic data, location data, logs and other communication data and the resources that you access through the Website, and (ii) information about your computing environment and internet connection, including, among other things, your IP address, operating system, browser software, hardware and geographical location. We do not collect personally identifiable information through these automatic data collection technologies, but we may tie this information to personally identifiable information about you that we collect from other sources or that you provide to us.

HOW WE USE A CUSTOMER'S INFORMATION

We may use information that we collect about you or that you provide to us, including any personal information, (i) to provide you with information or services that you may request from us, (ii) to fulfill any other purpose for which you provide that information, (iii) to provide you with notices related to your use of the Website and marketing materials related to products and services we or our affiliates may provide, (iv) to verify your compliance with the Website's terms and conditions of use and any other agreements governing your use of the Website, (v) to carry out our obligations and enforce our rights under any other contracts entered into between you and us or our affiliates, and as required by applicable law, (vi) to improve the Website (vii) in any other way we may describe when you provide the information or (viii) for any other purpose with your consent.

DISCLOSURE OF CUSTOMER INFORMATION

We may disclose aggregated information about the Website's users, including you, and information that does not identify any particular user, without restriction.

We may disclose personally identifiable information that we collect or you provide as described in this privacy policy (i) to our subsidiaries, professional advisors and affiliates, (ii) to contractors, service providers and other third parties we use to support our business, (iii) to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us about the Website users is among the assets transferred, (iv) to fulfill the purpose for which you provide it, (v) to our affiliates to market to you, (vi) for any other purpose disclosed by us when you provide the information or (vii) for any other purpose with your consent.

We may also disclose your personal information (i) to ensure compliance with our obligations under applicable law or legal process, including disclosure to government agencies, other regulatory bodies and law enforcement officials (ii) to enforce or apply the terms of any contracts entered into between you and us or our affiliates or (iii) if we believe disclosure is necessary or appropriate to protect our rights, property or safety or those of others with whom we have a relationship.

We do not share your information with non-affiliates for them to market to you.

DATA SECURITY

We have implemented reasonable measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. Unfortunately, the transmission of information via the Internet

is not completely secure. Despite those measures, we cannot guarantee the security of your personal information transmitted through the Website. Any transmission of personal information is at your own risk.

CHANGES TO THE PRIVACY POLICY

It is our policy to post any changes we make to our privacy policy on this page. The date on which the privacy policy was last revised is identified at the top of the page. You are responsible for periodically reviewing this privacy policy to check for any changes.

CONTACT INFORMATION

To ask questions about this privacy policy and our privacy practices, contact us at gothamfunds@gotham.com.

References to “we,” “us,” “our” and derivations thereof in this privacy policy are to Gotham Asset Management, LLC, the investment advisor to the Gotham Funds.