

Bridgeway Capital Management, Inc.
California Consumer Privacy Act Disclosure
For California Partners/Staff and Applicants for Employment
For Partners/Staff and Applicants that Reside in California
July 31, 2020

This **Privacy Notice for California Partners/Staff and Applicants for Employment** (“**CA Employee Privacy Notice**”) supplements the information contained in the Privacy Policy of Bridgeway Capital Management, Inc. (“**Bridgeway**”) <https://bridgewayfunds.com/wp-content/uploads/sites/2/2019/11/BCM-Privacy-Notification-2018.09.18.pdf> (the “**Privacy Policy**”) and only applies to Partners/staff members and applicants’ service of Bridgeway who are residents of California (collectively, “**Associates**”).

This CA Partners Privacy Notice explains how Bridgeway collects, uses and discloses personal information relating to Associates who are subject to the California Consumer Privacy Act of 2018 (“**CCPA**”).

What is Personal Information?

Under the CCPA, “**Personal Information**” 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 does not include de-identified or aggregated information.

Information We Collect

We may collect Personal Information from you in a variety of different situations, including, but not limited to on our Website, through your mobile device, through e-mail, in our physical office locations, through the mail, and/or over the phone. We may also collect Personal Information from you in the ways described in our Privacy Policy <https://bridgewayfunds.com/wp-content/uploads/sites/2/2019/11/BCM-Privacy-Notification-2018.09.18.pdf>.

We do not sell your Personal Information to anyone. Within the last 12 months, the Personal Information we have obtained on Associates include 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 on Associates during ordinary business.

Category	Examples	Collected
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.	YES
B. Personal information categories listed in the California Customer Records statute	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	YES

(Cal. Civ. Code § 1798.80(e)).	number, or any other financial information, medical information, or health insurance information. Some Personal Information included in this category may overlap with other categories.	
C. Protected classification characteristics under California or federal law.	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).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
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
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information, such as call and video recordings.	YES
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
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

K. Inferences drawn from other Personal Information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO
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Bridgeway obtains the categories of Personal Information listed above in the following ways:

- Directly from you when you provide the information to Bridgeway.
- Indirectly from you while you interact with our Website.
- Indirectly through contact with personal references that you provide.

No Sale of Personal Information

Bridgeway has not sold any Personal Information related to Associates within the previous 12 months and will not sell any Personal Information.

Use and Disclosure of Personal Information

We may collect, use, or disclose Personal Information listed in this CA Partners Privacy Notice for the following business purposes:

- To fulfill or meet the purpose for which you provided the information.
- To contact you and inform you about your benefits or information relating to your service or potential service.
- To provide, support, personalize, and develop our website and services relating to your service or potential service.
- To provide, support, personalize, and develop our Website and other financial products and services.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- 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. For more information regarding how Personal Information is shared, please review “Disclosure of Your Information” in Bridgeway’s Privacy Policy. <https://www.bridgeway.com/wp-content/uploads/BCM-Privacy-Procedures-20200731.pdf>

Contact Information

To ask questions or comments about this privacy policy and our privacy practices, contact us at:

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20 Greenway Plaza
Suite 450
Houston, TX 77056
info@bridgeway.com

or via our toll-free number:

800-661-3550