

MYERS CAPITAL MANAGEMENT, INC.

PRIVACY NOTICE

Introduction

Myers Capital Management, Inc. (“MCMI” “we” or “us”) provides this notice (this “Privacy Notice”) and sets forth our policies for the collection, use, storage, sharing, disclosure (collectively, “processing”) and protection of personal data relating to current, prospective and former clients, as applicable. Your privacy is critical to us, and MCMI is committed to safeguarding the use of our client’s personal information. References to “you” or “client” in this Privacy Notice mean any client who is an individual or connected with a client who is a legal person, as applicable.

Who to Contact About This Privacy Notice

This Privacy Notice is being provided in accordance with the applicable requirements under the privacy and data protection laws that apply in the jurisdictions where we operate (collectively, the “Data Protection Laws”).

Please contact Mr. Paul Myers at paul@myerscap.com, or 215-657-0300, or by writing to the following address: 1444 Saint Charles Place, Abington, PA. 19001-2327 with any questions about this Privacy Notice or requests with regards to the personal data we hold or for specific information or requests concerning the processing of personal data.

The Types of Personal Data We May Hold

The categories of personal data we may collect include but is not limited to names, residential or business addresses, or other contact details, signature, tax identification, date of birth, place of birth, government-issued photo ID, copies of identification documents, bank account details, information about assets or net worth, credit history, information on investment activities, or other personal data, such as certain special categories of personal data, as specified under the applicable Data Protection Laws, that may be contained in the relevant materials, documents, or obtained through background searches.

How We Collect Personal Data

We may collect personal data about you through: (i) information provided directly to us by you or another person on your behalf; or (ii) information that we obtain concerning any transactions between you and us. We collect this personal data to administer, manage, service, and provide related services for client accounts. It is necessary for MCMI to provide access to client information within the firm and to non-affiliated companies with whom we have entered into agreements.

How We May Use Personal Data

We may process your personal data to administer the relationship between you and us (marketing our products and services, monitoring and analyzing our activities, and complying with applicable legal or regulatory requirements, including anti-money laundering, fraud prevention, tax reporting, sanctions compliance, or responding to requests for information from supervisory authorities, or law enforcement agencies).

We will use one of the permitted grounds under the applicable Data Protection Laws to process your personal data. Such grounds include, for example, circumstances where:

- (i) we are required to comply with a legal or regulatory obligation applicable to us; or
- (ii) we, or a third party on our behalf, have determined that it is necessary for our legitimate interests to collect and use your personal data, such as if we believe that you have a reasonable expectation for us or a third party to collect or use your personal data for such purpose.

How We May Share Personal Data

MCMI does not sell your personal information to anyone. Nor do we provide such information to others except for discrete and reasonable business purposes in connection with the servicing and management of our relationship with you.

We may disclose information about you to non-affiliated third parties without prior client consent when we believe it is necessary to conduct our business or as required or permitted by law or otherwise perform our contractual obligations. We may also need to share your personal data with regulatory, tax, or law enforcement authorities to comply with applicable legal or regulatory requirements, respond to court orders, or in the context of regulatory requests for information, administrative proceedings, or investigations. We will also release information about you if you direct us.

We may also disclose information about you or your transactions and experiences with us to comply with federal, state, or local laws and other applicable legal and regulatory requirements.

Retention Periods and Security Measures

We will limit the amount of personal data we collect and limit the amount of time we store such information to the amount reasonably necessary to accomplish our business purposes or comply with U.S. state or federal laws or regulations. To protect your personal data from unauthorized access and use, MCMI has procedures that we believe are reasonably designed to protect the security and confidentiality of your information. These include confidentiality agreements with companies we hire to help us provide services to you, password-protected user access to our computer files, training of employees, and strict confidentiality policies that apply to all employees. These measures include computer safeguards and secured files and buildings. Even if we cease to provide you with financial products or services, our Privacy Policy will continue to apply to you. We will continue to treat your non-public information with strict confidentiality.

We will notify you of any material, personal data breaches affecting you in accordance with the requirements of applicable Data Protection Laws.

Additional Information under applicable Privacy laws

We may disclose information about our clients, prospective clients, or former clients for our everyday business purposes, such as to process your transactions, maintain your account(s) or respond to court orders and legal investigations, or help us prevent fraud. We will also release information about you if you direct us.

You may contact us at any time to limit our sharing of your personal data. If you limit sharing for an account you hold jointly with someone else, your choices will apply to everyone on your account. U.S. State laws may give you additional rights to limit sharing.

Revised April 2022