



# GGHC Privacy Policy

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.

The types of personal information we collect and potentially share when required, or to provide you services are as follows\*:

- Name and Address
- Personal Financial Information
- Account Activity
- Date of Birth and Social Security Number
- Cash Balances and Account Holdings
- Purchase and Sale Transactions
- Familial Relationships

\*Please note that other personal information may be shared for a limited purpose, and only if the client has affirmatively consented.

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

All financial companies need to share customer's personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer's personal information; the reasons Gilder Gagnon Howe & Co. LLC chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Gilder Gagnon Howe & Co. LLC share?	Can you limit this sharing?
For our everyday business purposes	Yes	No
For joint marketing with other financial companies	No	We do not share
For our affiliates' everyday business purposes	No	We do not share
For non-affiliates to market to you	No	We do not share

## How does Gilder Gagnon Howe & Co. LLC protect my personal information?

Our employees are required to protect the confidentiality of information and comply with our established policies. They may access information only when there is an appropriate reason to do so, such as to administer your accounts. We collect only relevant information about our clients. We restrict your personal information to only those individuals who need to know that information in order to provide services for you. We maintain physical, electronic, and procedural safeguards that comply with state and federal regulations to protect your personal information.

## How does Gilder Gagnon Howe & Co. LLC collect my personal information?

We collect non public personal information about you from the following sources: (a) Information we receive from you on applications or other forms, such as name, address, social security number, assets and income; (b) Information about your transactions with us, our affiliates, or others; and (c) Information we receive from a consumer reporting agency.

## Why can't I limit all sharing?

Gilder Gagnon Howe & Co. LLC limits the collection and use of information to the minimum necessary requirements to deliver our services to you, and to comply with industry rules and regulations. This sharing of information is required in order for us to conduct our everyday business of maintaining your accounts, processing transactions, and administering our business.

## Other important information:

As described above, we may disclose information we collect from you in connection with our everyday business purposes. Examples of our everyday business purposes include but are not limited to account opening with a broker or custodian, processing transactions, auditing purposes and responding to any regulatory authorities, court orders or legal investigations, and managing our client relationships. We reserve the right to change this Privacy Policy. The examples contained within this Privacy Policy are illustrations and are not intended to be exclusive. This notice complies with federal law and SEC regulations regarding privacy. You may have additional rights under other foreign or domestic laws.

## Definitions:

**Affiliates:** Companies related by common ownership or control. They can be financial and nonfinancial companies. Gilder Gagnon Howe & Co. LLC does not share with our affiliates.

**Non-affiliates:** Companies not related by common ownership or control. They can be financial and nonfinancial companies. Gilder Gagnon Howe & Co. LLC does not share with non-affiliates.

**Joint marketing:** A formal agreement between nonaffiliated financial companies that together market financial products or services to you. Gilder Gagnon Howe & Co. LLC does not jointly market.

For any questions contact: GGHC Compliance Department | (212) 765-2500 | [compliance@gghc.com](mailto:compliance@gghc.com)

Members of the NYSE, FINRA and SIPC

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