



**GA PINCUS FUNDS, LLC**

## **PRIVACY POLICY**

**Effective Date:** February 18, 2026

**Last Updated:** February 19, 2026

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### **Our Commitment to Protecting Your Privacy**

GA Pincus Funds, LLC (“GA Pincus,” “Firm,” “we,” “us,” or “our”) is committed to protecting the confidentiality and security of our clients’ nonpublic personal information (“NPI”).

This Privacy Policy is adopted pursuant to Regulation S-P under the Investment Advisers Act of 1940 and applicable Tennessee securities regulations.

This notice describes how we collect, use, safeguard, and share client information.

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### **Information We Collect**

In the course of providing investment advisory services, we may collect nonpublic personal information about you from the following sources:

- Information provided by you in advisory agreements, account forms, trust documents, questionnaires, emails, telephone conversations, or other communications (e.g., name, address, Social Security number, date of birth, employment information, income, net worth, investment objectives);
  - Information about your transactions and account balances;
  - Information received from custodians, co-trustees, or other authorized representatives;
  - Information from publicly available sources.
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### **How We Use and Share Information**

We do not sell client information.

We may share nonpublic personal information as permitted by law and as necessary to conduct our business, including:

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- With qualified custodians such as Charles Schwab to maintain and service accounts;
- With co-trustees, beneficiaries, or other fiduciaries as required by governing trust documents;
- With your accountants, attorneys, or other representatives at your direction;
- With service providers who assist us in operating our business (e.g., technology providers, compliance consultants, auditors), subject to confidentiality obligations;
- To comply with federal, state, or local laws, court orders, regulatory examinations, or legal process;
- In connection with a proposed or actual sale, merger, or restructuring of the Firm;
- To protect against fraud or unauthorized transactions.

Certain disclosures are required or permitted by law and are not subject to opt-out rights.

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## **Opt-Out Rights**

Regulation S-P permits clients to opt out of certain non-essential disclosures to nonaffiliated third parties.

Because GA Pincus does not sell client information and only shares information as permitted or required by law or for necessary business purposes, most of our disclosures are not subject to opt-out.

If in the future we intend to share information in a manner that triggers opt-out rights under applicable law, we will provide advance notice and an opportunity to opt out.

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## **Trustee and Fiduciary Capacity**

GA Pincus may serve as trustee or co-trustee of certain client trusts. In such capacity, we may access or share information consistent with fiduciary responsibilities and governing trust documents.

Trust assets are maintained with qualified custodians, and account statements are delivered directly to beneficiaries as required.

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## How We Protect Your Information

We maintain a Written Information Security Program (“WISP”) designed to safeguard client information.

Our safeguards include:

- Restricted access to client information;
- Multi-factor authentication for system access;
- Encryption of sensitive information in transit and at rest where appropriate;
- Secure cloud-based data storage;
- Secure destruction of sensitive documents;
- Vendor due diligence and oversight;
- Periodic cybersecurity risk assessments.

Access to client information is limited to individuals and service providers who require such information to provide advisory services.

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## Data Retention

We retain client information for as long as necessary to provide services and to comply with legal and regulatory requirements.

When information is no longer required, it is securely destroyed in accordance with our data retention policies.

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## Former Clients

This Privacy Policy applies to current and former clients.

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## Changes to This Policy

We reserve the right to update this Privacy Policy as necessary. If material changes are made, we will provide notice as required by law.



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## Questions

If you have any questions about this Privacy Policy or our information practices, please contact:

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