



Tocqueville Asset Management L.P.

PRIVACY NOTICE

FACTS	WHAT DOES TOCQUEVILLE DO WITH YOUR PERSONAL INFORMATION?
WHY?	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.
WHAT?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: • Social Security number and income • assets and investment experience • transaction history and wire transfer instructions When you are no longer our customer, we continue to share your information as described in this notice.
HOW?	All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Tocqueville chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Tocqueville share?	Can you limit this sharing?
For our everyday business purposes – Such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – To offer our products and services to you	Yes	No
For joint marketing with other financial companies	Yes	No
For our affiliates' everyday business purposes — Information about your transactions and experiences	No	We don't share



Tocqueville Asset Management L.P.

For our affiliates' everyday business purposes — Information about your creditworthiness	No	We don't share
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For nonaffiliates to market to you	No	We don't share
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Who we are

Who is providing this notice?	Tocqueville Asset Management L.P.
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What we do

How does Tocqueville protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. Contracts with our service providers require them (i) to restrict access to your non-public personal information and (ii) to maintain physical, electronic and procedural safeguards against unintended disclosure.
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How does Tocqueville collect my personal information?	We collect your personal information, for example, when you • open an account or enter into an investment advisory contract • provide account information or give us your contact information • make a wire transfer
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Why can't I limit all sharing?	Federal law gives you the right to limit only • sharing for affiliates' everyday business purposes – information about your creditworthiness • affiliates from using your information to market to you • sharing for nonaffiliates to market to you
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State laws and individual companies may give you additional rights to limit sharing.

Definitions

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. • Affiliates include a broker-dealer as well as the investment advisor
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. • Nonaffiliates we share with can include financial companies such as broker-dealers, custodians, financial advisers and nonfinancial companies such as fulfillment, proxy voting, and class action service providers
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. • Our joint marketing partners include placement agents who market interests in the funds we manage.



Tocqueville Asset Management, L.P., and Its Affiliates' Privacy Notice for California Residents

This Privacy Notice for California Residents ("Notice") supplements our general Privacy Notice and applies only to the data of California residents as required by the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively the "CCPA"), and other California privacy laws. Any terms defined in the CCPA have the same meaning when used in this section of the Policy.

The purpose of this Notice is to provide you with a comprehensive description of our practices regarding the collection, use, disclosure, and sale of your personal information, if applicable, and of your rights regarding your personal information.

Collection and Disclosure of Your Personal Information

The scope of "personal information" under the CCPA is broad and includes any information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked to a particular consumer or household. We may collect and use the following personal information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household:

Below are categories of personal information that we have collected about consumers within the last twelve (12) months. The examples below are given only to provide a meaningful understanding of the category; not all examples are necessarily collected by Tocqueville and its Affiliates or for a given consumer group or across all such groups.

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 (Cal. Civ. Code § 1798.80(e)).	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 number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.	YES

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.	YES
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.	NO
G. Geolocation data.	Physical location or movements.	YES
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
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.	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

L. Sensitive personal information	Personal information that reveals: • Social Security, driver's license, state identification card, or passport number. • Account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account. • Precise geolocation.	YES
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“Personal Information” is information that identifies, relates to, describes, or is reasonably capable of being connected to you or your household. Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like:
 - Health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data.
 - Personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

We will keep the personal information we collect about you for as long as necessary to carry out the purposes set forth in this Notice, but no longer than as required or permitted under applicable law or our internal policy. We dispose of the information we collect in accordance with our retention policies and procedures.

We collect most of this personal information directly from you in person, by telephone, mail, or email. However, we may also collect information:

- From publicly accessible sources (e.g., property records).
- Directly from a third party, e.g., sanctions screening providers, credit reporting agencies, or customer due diligence providers.
- From a third party with your consent (e.g., your bank).

We share your personal information with affiliated and nonaffiliated service providers to help conduct our business, and these arrangements are subject to data protection agreements. Our affiliated providers include companies with a “Tocqueville” name, such as Tocqueville Securities, L.P. and Tocqueville Asset Management, L.P. Nonaffiliated providers include financial companies such as broker-dealers, custodians, financial advisers, joint marketing partners who market interests in the funds we distribute and nonfinancial companies such as fulfillment, proxy voting and class action service providers, as well as law enforcement authorities, self-regulatory organizations (e.g., FINRA), and other regulators, as required by law. In the preceding 12 months, we have shared the following categories of your personal information:

Category	Categories of Entities to Whom We May Disclose Personal Information for Business Purposes
A. Identifiers.	Our Affiliates; Services Providers; Third Parties to whom you or your agents authorize use to disclose your personal information in connection with products or services we provide you.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Our Affiliates; Services Providers; Third Parties to whom you or your agents authorize use to disclose your personal information in connection with products or services we provide you.
C. Protected classification characteristics under California or federal law.	Our Affiliates; Services Providers; Third Parties to whom you or your agents authorize use to disclose your personal information in connection with products or services we provide you.
L. Sensitive personal information	Our Affiliates; Services Providers; Third Parties to whom you or your agents authorize use to disclose your personal information in connection with products or services we provide you.

You have the right, subject to certain exceptions defined in the CCPA and other applicable laws and regulations, to request that Tocqueville stop sharing your personal information with third parties. Once we receive and confirm your verifiable consumer request, we will no longer share your personal information with third parties and will not do so unless you later authorize us to do so again.

You have the right to opt-out of the sharing of your personal information for non-necessary purposes by contacting our Data Protection Officer at TocquevilleCCPA@tocqueville.com and Telephone No. (772) 247-0456.

No Sale of Personal Information

Tocqueville does not sell personal information and has not sold personal information in the preceding twelve (12) months. To the extent that Tocqueville ever changed its policy and chose to sell personal information, you would have the right to opt-out of the sale of your personal information.

Access to Specific Information Rights

You have the right, subject to certain exceptions defined in the CCPA and other applicable laws and regulations, to request that Tocqueville disclose certain information to you about our collection and use of

your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting that personal information.
- The categories of third parties with whom we share that personal information.
- The categories of personal information that each recipient received.
- The specific pieces of personal information we collected about you.

Deletion Request Rights

You have the right, subject to certain exceptions defined in the CCPA and other applicable laws and regulations, to request that Tocqueville delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request we will delete (and direct our service providers to delete) your personal information from our records.

Correction Request Rights

You have the right to request that Tocqueville correct any inaccurate personal information that we have about you and direct our service providers to do the same. We may require you to provide documentation, if necessary, to establish whether the personal information is accurate. Any such documentation will only be used for the purpose of correcting your personal information. We may deny a request to correct if we determine that the contested personal information is more likely than not accurate based on the totality of the circumstances.

Exercising Your Rights

To exercise the access, and deletion rights described above, please contact our Data Protection Officer at TocquevilleCCPA@tocqueville.com and Telephone No. (772) 247-0456.

You may make an unlimited number of verifiable consumer requests for deletion within a 12-month period. However, you may only make a verifiable consumer request for access twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to verify, to a reasonably high degree of certainty, that you are the person about whom we collected personal information. This may include requesting that you provide us with at least two or more pieces of personal information to match against personal information about you that we may or may not maintain and which we have determined to be reliable for the purpose of verification.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request. We will endeavor to respond to a verifiable customer request within 45 days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

Any response we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Authorized Agent

Only you, or a person you have designated in writing as your authorized agent, or whom is registered with the California Secretary of State to act on your behalf, or whom you have provided power of attorney pursuant to California Probate Code sections 4000 to 4465, ("Authorized Agent"), may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

If you wish to have an Authorized Agent make a verifiable consumer requests on your behalf, they will need to provide us with sufficient written proof that you have designated them as your Authorized Agent and we will still require you to provide sufficient information to allow us to reasonably verify that you are the person about whom we collected personal information.

Non-Discrimination

You have the right not to receive discriminatory treatment for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt in consent, which you may revoke at any time.

Additional Information

For any questions or concerns about this Notice, please contact our Data Protection Officer at TocquevilleCCPA@tocqueville.com and Telephone No. (772) 247-0456.

ⁱ ***Our affiliates include companies with a "Tocqueville" name, such as Tocqueville Asset Management L.P. and Tocqueville Securities L.P.***

Effective January 1, 2020

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