

Tygh Capital Management's Privacy Policy

Our commitment to you

As a client of Tygh Capital Management, you've entrusted to our care not only your financial assets but certain personal and financial data as well. We recognize that your relationship with us is based on trust and that you expect us to act responsibly and in your best interests. Because your personal and financial data is *your private information*, we hold ourselves to the highest standards in its safekeeping and use. Tygh Capital Management may serve as the investment advisor or subadvisor to an investment company registered under the Investment Company Act of 1940 (each, a "Fund"), and as such maintains shareholder information for each Fund under management. It is the policy of Tygh Capital Management to adopt each Fund Privacy Policy, which shall be incorporated by reference into this Policy.

We collect nonpublic personal information about our clients from information we receive from your applications or other forms relating to establishing an account with us. In addition, we obtain information in connection with executing transactions on your behalf and dealing with your custodian.

All information regarding client identity, security holdings and financial status will be kept strictly confidential. We maintain physical, electronic and operational safeguards to protect nonpublic personal information about our clients.

We do not disclose any of your nonpublic personal information unless

- (1) you request or authorize it,
- (2) we have been advised that your accountant, attorney, or consultant is requesting the information on your behalf, or
- (3) we are legally required to provide the information to a governmental agency.

We sometimes find it necessary to provide personal information about you to entities that provide a service on behalf of Tygh Capital Management, such as firms that provide reports or custody services on behalf of our clients. These companies are expected to maintain strict privacy and confidentiality policies.

If you have any questions about our privacy policies or our commitment to you to safeguard private information, please contact Jeff B. Curtis at 503-972-0150.