



Gagnon Securities LLC
Privacy Policy

In compliance with SEC Regulation SP, we notify you annually of our policies and procedures with regard to how we maintain our client's privacy. Gagnon Securities, LLC ("Gagnon Securities") has a long-standing policy committed to protecting our clients' confidentiality and the security of all information obtained from our clients. If you have any questions or concerns regarding these procedures discussed below, please do not hesitate to call me directly.

Prior to opening an account with us, we obtain directly from you financial and personal information. This information is used by your broker and our management team to evaluate suitability for our investment approach, as well as to determine how together we can meet your individual investment goals. Periodically, we will ask that you furnish us with updated information.

All persons employed at Gagnon Securities have access to this information for administrative purposes. All client files and records are kept within a secure area of the office. Our client relationship management system is password protected and only employees within our client service department as well as our IT department maintain access to the system. All of our employees are required to protect our clients' confidentiality and access information only when appropriate to do so. Violators of our policies are subject to disciplinary action and/or legal action, per our confidentiality agreement that all employees sign upon hire.

We clear all our accounts through National Financial Services LLC, Fidelity Clearing & Custody Solutions® ("NFS") on a fully disclosed basis. Therefore, we forward all information and documentation pertaining to your account to NFS at the time your account is opened. Moreover, NFS maintains this information and records all account activity, and has its own privacy policy that it will forward to you under separate cover.

Gagnon Securities shares office space with other unaffiliated companies and individuals. Unaffiliated persons have an office distinctly separate from Gagnon Securities and have access only to "common areas" within our office. Unaffiliated persons or visitors to our floor are restricted from entering areas in which your personal information is kept.

It is our policy not to share or disclose any information to any person or business entities except as permitted by law or when specifically directed to do so by our clients. As you are aware, Gagnon Securities utilizes Battea Class Action Services LLC to process class actions on your behalf. For more information about opting out of this service please contact your client service team at 212-554-5038 or clientservices@gagnonsec.com.

I hope you have found this brief discussion informative and, if you have any questions, please contact me directly at lisa@gagnonsec.com or 212-554-5060. Thank you for your consideration.

Lisa Ferrante
Chief Compliance Officer