

PRIVACY POLICY

The NorthQuest Capital Fund and Emerald Research Corporation Privacy Notice

Effective Date: February 27, 2026

Purpose and Scope

The Privacy Policy establishes administrative, technical, and physical safeguards for the protection of “Shareholder Information” – defined as non-public personal information (NPI) of natural persons. It applies to all employees, supervised persons, and service providers.

Collection of Your Personal Information

We collect personal information (such as your name, address, social security number, tax identification number, date of birth, phone number and other information) that you provide us when establishing a shareholder account in the Fund. We also keep record of all securities transactions such as your account balances and transaction histories.

Sharing Your Personal Information

We may share your personal information with service-related third parties which include the transfer agent, the custodian, the auditors. The Fund does not otherwise provide non-public personal information about you to outside firms, organizations or individuals except to our attorneys, accountants, governmental and law enforcement officials, as permitted by law.

Protecting Your Personal Information

Keeping your personal information secure is one of our most important responsibilities. Your shareholder information is handled by service providers for the Fund. The Fund restricts access to shareholder information to those service providers who need to know that information to provide products and services to you or to maintain or service those products or services. The Fund maintains physical, electronic, and procedural security measures to protect your personal information and require third party service providers to secure your non-public personal information with the same high degree of confidentiality.

Breach Notification

If the Fund believes the security of your personal information in the possession of our service providers or control may have been compromised, the Fund may seek to notify you subject to applicable laws and regulations governing such notifications.

Policy Updates

The Privacy Policy will be provided to our shareholders annually. The Policy may be modified at any time but you can always review our current Policy on our website at www.northquestfund.com or contact us for a copy of the Privacy Policy by the following options:

By telephone: 800-239-9136

By mail:

NorthQuest Capital Fund
c/o Mutual Shareholder Services, LLC
8000 Town Centre Drive, Suite 400
Broadview Heights, Ohio 44147