



CLIENT PRIVACY NOTICE

We consider privacy to be fundamental to our relationship with our investors. We are committed to maintaining the confidentiality, integrity and security of our current and former investors nonpublic information. Accordingly, we have developed internal policies to protect confidentiality while allowing investors needs to be met.

We respect your right to privacy. We also know, however, that you expect us to conduct our investment program in an accurate and efficient manner. To do so, we must collect and maintain certain non-public information about you and our other investors. We collect this information from sources such as subscription agreements and other documents.

We will not disclose any non-public personal information about investors who are individuals, except to our affiliates and service providers as allowed by applicable law or regulation. In the normal course of serving our investors, information we collect may be shared with companies that perform various services such as our accountants, auditors, attorneys, compliance consultants, and fund administrators. Specifically, we may disclose to these service providers non-public personal information including, without limitation:

- Information we receive on subscription agreements or other documents, such as name, address, email address, social security or tax identification number, account numbers, assets and income information; and
- Information about transactions with us, our affiliates or others, such as participation in other investment programs, ownership of certain types of accounts or other account data.

Any party that receives this information will use it only for the services required and as allowed by applicable law or regulation, and is not permitted to share or use this information for any other purpose. To protect the personal information of individuals, we permit access only by authorized employees who need access to that information to provide services to us and our investors. Failure to observe our procedures regarding customer and consumer privacy will result in discipline and may lead to termination. In order to guard investors' non-public personal information, we maintain physical, electronic and procedural safeguards that comply with U.S. federal standards. An individual investor's right to privacy extends to all forms of contact with us, including telephone, written correspondence and electronic media, such as the internet.

The Administrator and its affiliates may also act as a data controller of your personal information in connection with the performance of its legal and contractual obligations and in furtherance of their legitimate business interests. For further information, you can access the Administrator's and its affiliates' privacy notice at: <https://citco.com/footer/privacy-policy/>

We are committed to the protection and privacy of its customers' and consumers' personal and financial information. We will not share such information with any affiliated or nonaffiliated third party except:

- When necessary to complete a transaction in a customer account, such as with the clearing firm or account custodians;
- When required to maintain or service a customer account;
- To resolve customer disputes or inquiries;
- With persons acting in a fiduciary or representative capacity on behalf of the customer;
- With rating agencies, persons assessing compliance with industry standards, or to the attorneys, accountants and auditors of the firm;
- In connection with a sale or merger of our business;
- To protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability;
- To comply with federal, state or local laws, rules and other applicable legal requirements;
- In connection with a written agreement to provide investment management or advisory services when the information is released for the sole purpose of providing the products or services covered by the agreement; and
- In any circumstances with the customer's instruction or consent.

Opt-Out Provisions

It is not a policy of ours to share nonpublic personal and financial information with affiliated or unaffiliated third parties except under the circumstances noted above. Since sharing under the circumstances noted above is necessary to service customer accounts or is mandated by law, there are no allowances made for clients to opt out.