

U.S. Privacy Notice

This Privacy Notice explains how we collect, utilize, and maintain nonpublic personal information about our investors, as required under Federal legislation. This Privacy Notice applies only to investors who are individuals investing for personal, family or household purposes, and such other persons as may be required by law and is subject to change. We are committed to protecting your privacy and maintaining the confidentiality and security of your personal information. Therefore, we are sending you this Privacy Notice to help you understand how we handle the personal information about you that we collect and how we use that information.

Categories of information we collect and may disclose

We use the personal information collected about you to provide you with better service or comply with laws and regulations. We may collect nonpublic personal information about you from the following sources:

- Applications, investor questionnaires, investment management or advisory agreements, subscription agreements or other forms (for example, name, address, Social Security number, assets, and income);
- Records of financial transactions in which you participated (such as purchases, sales, account balances, inquiries, etc.); and
- Other interactions with us or our affiliates (such as discussions or other contacts with our staff, via telephone, written correspondence, and electronic media).

We do not sell or rent investor information. We do not disclose nonpublic personal information we collect about you to nonaffiliated parties without your consent, except under situations below or as permitted by law:

- To service providers in connection with the administration and servicing of investors, which may include attorneys, administrators, custodians, consultants, accountants, auditors, and other professionals. We may also share information in connection with the servicing or processing of investor transactions;
- To persons assessing our compliance with industry standards (e.g., professional licensing authorities, compliance consultants, etc.);
- To respond to a subpoena or court order, judicial process or regulatory inquiry;
- To protect against fraud, unauthorized transactions (such as money laundering), claims or other liabilities; and
- Upon your authorization to disclose such information to persons acting in a fiduciary or representative capacity on your behalf. 1 If you prefer that we not disclose nonpublic personal information about you to nonaffiliated third parties or to affiliated entities, you may opt out of these disclosures by directing us not to make those disclosures (other than disclosures permitted by law) by providing written notice to the firm at the following address: 6 EAST 1ST STREET, SUITE 5A, NEW YORK, NY, 10003.

Security of information

As a matter of policy, we require that all employees, financial professionals, and companies providing services on our behalf keep client information confidential. We

maintain physical and electronic safeguards to protect investor information. Third Parties with whom we share investor information are provided such information on a “need to know” basis and must agree to follow appropriate standards of security and confidentiality. The privacy policy applies to both current and former investors. We may disclose nonpublic personal information about an investor to the same extent as for a current investor.

Changes to this privacy policy

We reserve the right to change this Privacy Notice at any time. In such instances, we will notify investors of any material change to this policy before implementing the change.

Further information

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