# STONE COAST FUND SERVICES LLC AND STONE COAST FUND SERVICES LTD. PRIVACY NOTICE TO FUND CLIENT INVESTORS

This Privacy Notice ("Notice") sets forth a summary of policies of Stone Coast Fund Services LLC and Stone Coast Fund Services Ltd. ("Stone Coast") regarding our processing of Personal Data related to investors in our fund clients (each a "Fund" and together the "Funds"). This Notice should be read in conjunction with a Fund's Privacy Notice or privacy policy, which may further detail their role as data controller, where applicable, as well as your rights under applicable law, and how you may exercise them.

In this Notice, we use the following defined terms:

"Personal Data" includes an individual's name, address, email address, date of birth, passport details or other national identifier, driver's license number, and employment information. It can also include data which, when aggregated with other data, enables an individual to be identified;

"we", "us" and "our" refers to Stone Coast Fund Services LLC and Stone Coast Fund Services Ltd.; and

"you" and "your" refers to investors in a Fund.

#### Who Is Providing This Notice?

This Notice is provided by Stone Coast in its capacity as fund administrator to a Fund in which you are invested.

#### What Role Do We Perform in Relation to Your Personal Data?

Stone Coast's authorization to process your Personal Data has been provided by the Fund in its capacity as the party ultimately responsible for the security of that information. Such authorization is provided in the terms of the master services agreement between Stone Coast and a Fund that describe our relevant administration services and may be further described in a relevant addendum to that agreement (the "Services").

In certain circumstances, Stone Coast may serve as a data processor in its provision of Services to Funds subject to the Cayman Islands Data Protection Act (CIDPA), the General Data Protection Regulation (GDPR), or the California Consumer Privacy Act (CCPA). Where required, specific authorizations required for the processing of Personal Data are in place for Cayman Islands domiciled funds subject to the CIDPA as well as those Funds that have determined that they are subject to the GDPR or the CCPA.

#### Why and how do we process your Personal Data?

Personal Data collected by Stone Coast from Fund investors is limited to the information necessary and relevant to the purposes for which that data is collected. Personal Data is collected for the purpose of providing the Services, including processing investor transactions and fulfilling the investor due diligence requirements associated with the processing of those transactions. It is obtained to fulfil a Fund's regulatory and other industry obligations associated with these Services.

Stone Coast does not group, divide or otherwise analyze Personal Data for purposes of monetizing the Personal Data to which we have access, nor do we share data with third parties beyond those with which we contract to facilitate our provision of Services to Fund clients and other entities that are providing services directly to our Fund clients (Fund auditors, for example). For purposes of reporting data and documentation to them required by law, we may also share your Personal Data with applicable regulatory authorities, or with our legal counsel, where seeking advice on, and/or complying with, legal and regulatory requirements or legal rights and obligations. In exceptional circumstances and only where required to do so, we will share your Personal Data with regulatory, prosecuting and other governmental agencies or departments, and parties to litigation, in any country or territory.

To improve the quality of our Services to fund clients and their investors, and to facilitate the process of investor onboarding, Stone Coast may leverage Personal Data of an investor across the funds administered by Stone Coast with which the investor has a current or pending relationship by aggregating such Personal Data within an investor database. The Personal Data of an investor is not shared with any Fund client that has no current or pending relationship with such investor.

#### How Do We Obtain Your Personal Data?

We collect your Personal Data from a number of sources, including from you directly. These include, but are not limited to:

• the subscription agreement and identification documentation that you supply during the investor onboarding process;

- publicly available and accessible directories and sources, including websites; and
- a regulatory, criminal and sanctions screening platform.

# What Personal Data Do We Collect?

The Personal Data we may collect includes, but is not limited to:

- contact information: name, e-mail and telephone details, and business, residential and mailing addresses; and
- personal information: passport, national identity card or driver's license details, and banking information.

# How do we protect your Personal Data?

We seek to carefully safeguard your Personal Data and, to that end, we have measures in place that are reasonably designed to provide physical, electronic, and procedural safeguards to protect your Personal Data and to restrict access to such data to those persons who need to know the information to provide our Services.

### **Retention of Your Personal Data**

We will retain your Personal Data for as long as it is required for our legitimate business purposes and to the extent we are obligated to do so by law or regulation.