



PRIVACY POLICY

The purpose of this Privacy Policy (this “**Policy**”) is to provide you with information on the use of your personal data in accordance with applicable federal and state data protection legislation in the United States, the Cayman Islands Data Protection Act (as revised) and, in respect of EU data subjects, the EU General Data Protection Regulation (together, the “**Data Protection Legislation**”). Please read this Policy carefully to understand how we and persons engaged by us will use, store, share and otherwise process your personal data.

We do not disclose nonpublic personal data about our clients or former clients to third parties other than as described below.

In this document, “we”, “us” and “our” refers to CFI Partners, LLC.

Personal data we collect. We collect personal data about you, and others connected with you, in connection with making an investment. You will provide us with certain personal data which may constitute personal data within the meaning of the Data Protection Legislation. This information includes information such as your:

- Name;
- Address;
- Tax Identification Number;
- Assets;
- Investment Experience;
- Transaction History;
- Income; and
- Wire Transfer Instructions.

How we collect this information. We collect this information from you through various means. For example, when you give us your contact information, enter into an investment advisory contract with us, buy securities (i.e., interests in a fund) from us, tell us where to send money, or make a wire transfer. We also may collect your personal data from another person on your behalf, other publicly accessible directories and other sources, such as our affiliates or other non-affiliated companies.

Our affiliates are companies related to us by common ownership or control and can include both financial and nonfinancial companies. Non-affiliates are companies not related to us by common ownership or control and can include both financial and nonfinancial companies.

How we use this information. We may collect, store and use your personal data for lawful purposes including the following:

- The processing is necessary for the performance of a contract, for example:
 - opening, administering or managing your account or a fund you have invested in;
 - processing your subscription and investment in a fund, such as entering your information in the register of shareholders;
 - sending you statements relating to your account or investment;
 - providing advisory services to you; and
 - processing a transaction for your account or your investment.
- In pursuance of our legitimate interests, or those of a third party to whom your personal data are disclosed, for example:
 - complying with a legal, tax, accounting or regulatory obligation to which we or the third party are subject;
 - assessing and processing requests you make;
 - managing our risk and operations;
 - complying with audit requirements;
 - ensuring internal compliance with our policies and procedures; and
 - marketing products and services to you.
- The processing is necessary for compliance with applicable legal or regulatory obligations, for example:
 - undertaking investor due diligence including anti-money laundering and counter-terrorist financing checks, including verifying the identity and addresses of our investors (and, where applicable, their beneficial owners);
 - sanctions screening and complying with applicable sanctions and embargo legislation;
 - complying with requests from regulatory, governmental, tax and law enforcement authorities; and
 - responding to court orders and legal investigations.

We will only process your personal data in pursuance of our legitimate interests where we have considered that the processing is necessary and, on balance, our legitimate interests are not overridden by your legitimate interests, rights or freedoms.

Disclosure to others. We may provide your personal data to our affiliates and to firms that assist us in servicing your account and have a need for such information.

We will share your personal data with:

- a custodian or a fund administrator, and their respective affiliates for the purposes set out in this Policy, which include:
 - managing our relationship with you;
 - delivering the services you require;
 - managing your investment;
 - supporting and administering investment-related activities;

- complying with applicable investment laws and regulations;
 - delivering and facilitating the services needed to support our business relationship with you; and
 - supporting and administering investment-related activities,
- tax authorities:
 - to comply with applicable laws and regulations; and
 - where required by tax authorities (who, in turn, may share your personal data with other tax authorities),
 - our lawyers, auditors and other professional advisors for purposes of:
 - providing you with investment-related services; and
 - seeking advice on, and complying with, legal and regulatory requirements or legal rights and obligations.

In exceptional circumstances, we will share your personal data with regulatory, prosecuting and other governmental agencies or departments, and parties to litigation (whether pending or threatened) in any country or territory, as and to the extent required by law.

We will not sell your personal data. However, we may disclose your personal data in connection with a proposed or actual sale, merger, transfer, or exchange of all or a portion of a business or operating unit as permitted by Data Protection Legislation.

How we protect your personal data. To protect your personal data from unauthorized access and use, we use security measures that comply with applicable data protection laws. These measures include computer safeguards and secured files and buildings.

Sending your personal data internationally. Due to the international nature of our business, your personal data may be transferred to jurisdictions that do not offer equivalent protection of personal data as under the Data Protection Legislation. In such cases, we will process personal data or procure that it be processed in accordance with the requirements of the Data Protection Legislation, which may include having appropriate contractual undertakings in legal agreements with service providers who process personal data on our behalf.

Retention and deletion of your personal data. We will keep your personal data for as long as it is required by us. For example, we may require it for our legitimate business purposes, to perform our contractual obligations, or where law or regulation obliges us to. We will generally retain your personal data throughout the lifecycle of the investment you are involved in. Some personal data will be retained after your relationship with us ends. We expect to delete your personal data (at the latest) once there is no longer any legal or regulatory requirement or legitimate business purpose for retaining your personal data.

Automated decision-making. We will not make decisions producing legal effects concerning you, or otherwise significantly affecting you, based solely on automated processing of your personal data, unless we have considered the proposed processing in a particular case and concluded in writing that it meets the applicable requirements under the Data Protection Legislation.

Your rights. You have certain data protection rights, including the right to:

- be informed about the purposes for which your personal data are processed;
- access your personal data;
- stop direct marketing or sharing for cross-context behavioral advertising;
- restrict the processing of your personal data;
- have incomplete or inaccurate personal data corrected;
- ask us to stop processing your personal data;
- be informed of a personal data breach (unless the breach is unlikely to be prejudicial to you);
- complain to a data protection authority; and
- require us to delete your personal data in some limited circumstances.

Who is providing this Policy. This Policy relates to the following entities:

- CFI Partners, LLC

Who to contact with questions. If you have any questions about this Policy or the personal data we hold about you, please contact Joe Sommer, Chief Compliance Officer, at jsommer@cfipartners.com.