

PRIVACY POLICY

This privacy policy explains the manner in which the Partnership collects, utilizes and maintains nonpublic personal information about the Partnership's investors, as required under federal legislation. This privacy policy only applies to nonpublic information of investors who are individuals (not entities).

How We Collect Personal Information

The Partnership collects personal information about its investors mainly through the following sources:

- Subscription forms, investor questionnaires and other information provided by the investor in writing, in person, by telephone, electronically or by any other means. This information includes name, address, nationality, tax identification number, and financial and investment qualifications; and
- Transactions within the Partnership, including account balances, investments and withdrawals.

With Whom We May Share Personal Information

The Partnership does not sell or rent investor information. The Partnership does not disclose nonpublic personal information about its investors to nonaffiliated third parties or to affiliated entities, except as permitted by law. For example, the Partnership may share nonpublic personal information in the following situations:

- To service providers in connection with the administration and servicing of the Partnership, which may include attorneys, accountants, administrators, auditors and other professionals. The Partnership may also share information in connection with the servicing or processing of Partnership transactions;
- To affiliated companies in order to provide you with ongoing personal advice and assistance with respect to the products and services you have purchased through the Partnership and to introduce you to other products and services that may be of value to you;
- To respond to a subpoena or court order, judicial process or regulatory authorities;
- To protect against fraud, unauthorized transactions (such as money laundering), claims or other liabilities; and
- Upon consent of an investor to release such information, including authorization to disclose such information to persons acting in a fiduciary or representative capacity on behalf of the investor.

How We Protect Personal Information

The Partnership’s policy is to require that all employees, financial professionals and companies providing services on its behalf keep client information confidential.

The Partnership maintains safeguards that comply with federal standards to protect investor information. The Partnership restricts access to the personal and account information of investors to those employees who need to know that information in the course of their job responsibilities. Third parties with whom the Partnership shares investor information must agree to follow appropriate standards of security and confidentiality.

The Partnership’s privacy policy applies to both current and former investors. The Partnership may disclose nonpublic personal information about a former investor to the same extent as for a current investor.

The Partnership may make changes to its privacy policy in the future. The Partnership will not make any change affecting you without first sending you a revised privacy policy describing the change.

FOR CALIFORNIA RESIDENTS ONLY

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Policy and applies solely to users who reside in the State of California (“you”). We adopt this notice to comply with the amended California Consumer Privacy Act of 2018 (“CCPA”), The California Privacy Rights Act (the “CPRA”) and other California privacy laws. Any terms defined in the CCPA and/or the CPRA have the same meaning when used in this notice.

Categories of personal information that we collect –

During our communication with you via texts, calls, emails we might collect the below mentioned categories of personal information. This information might also be collected if you visit our website. Note that the categories listed below are defined by California state law. Inclusion of a category in the list below indicates only that, depending on the services we provide you, we may collect some information within that category. It does not necessarily mean that we collect all information listed in a particular category.

Category	Description	Examples
A.)	Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.

B.)	Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
C.)	Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
D.)	Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
E.)	Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
F.)	Geolocation data.	Physical location or movements.
G.)	Professional or employment-related information.	Current or past job history or performance evaluations.
H.)	Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Note: This is not an exhaustive list. Please see more details here -

[https://oag.ca.gov/privacy/ccpa#:~:text=The%20California%20Consumer%20Privacy%20Act,how%20to%20imple
ment%20the%20law.](https://oag.ca.gov/privacy/ccpa#:~:text=The%20California%20Consumer%20Privacy%20Act,how%20to%20implement%20the%20law.)

How We Use the Information We Collect

We may use the information we collect from you to:

- provide services to you;
- bill/invoice you;
- complete corporate transactions;
- manage any accounts that you may have with us;
- validate your identity;
- send personalized marketing messages via email, post and telephone to you. Where required by applicable law, we will send these messages with your consent, and you have the right to opt out of receiving marketing by contacting us;
- serve relevant advertising on our site and third-party sites related to our products and services which are personalized to your interests;
- provide you with notice of product releases, special events, trainings, promotions or other matters relevant to you;
- respond to your inquiries;
- improve the services you receive from us;
- solicit your feedback;
- prevent you from having to re-enter personal information about you on future visits to our websites or subsequent use of our applications;
- process your payments and purchases;
- operate, evaluate and improve our business (including developing new products and services; enhancing and improving our services; managing our communications; performing data analytics; and performing accounting, auditing and other internal functions);
- provide technical support/ answer your questions via Zoom calls;
- detect and prevent fraud and other unauthorized activity and enforce our terms of use; and
- comply with applicable legal requirements, relevant industry standards and our policies.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

How Long We Keep Personal Information

At a minimum, we will keep personal information about you for as long as we have a relationship with you, for example as long as you are a customer (and for a reasonable period thereafter). When determining how long to retain personal information after we no longer have a relationship with you, we take into account how long our customers usually want to continue hearing from us, our legal and regulatory obligations the expectations of regulators, as well as the length of time information is needed for internal audit purposes and to exercise or defend our legal rights.

- **Retention in case of queries** - We may retain your personal information for a reasonable period in case of follow up queries from you.
- **Retention in case of claims** - We may retain your personal information for the period in which you might legally bring claims against us (this means we will retain it in line with relevant limitation periods, which are applicable to your jurisdiction)
- **Retention in accordance with legal and regulatory requirements** - We will consider whether we need to retain your personal information after the period of retention in the case of queries or claims because of a legal or regulatory requirement.
- **Retention permitted under applicable law** - We will continue to retain personal information where necessary to provide our services to you and the retention of such personal information is necessary for the purposes of pursuing our legitimate interests or where it is necessary for public interest purposes.

We review our retention periods for Personal Information on a regular basis, and all data is retained in compliance with applicable data protection law. We will only permanently retain certain basic Personal Information, for limited purposes. This is in relation to retaining basic contact details, to keep a record that you were a customer, in case you return in future, or where you have asked us not to contact you again.

Your Rights

Subject to our regulatory and legal obligations, you may be entitled to certain rights, which can include:

- Where our use of your personal information requires consent, you may withdraw this consent at any time;
- You may request access to your personal information we hold about you and obtain information about how we process it. Depending on the applicable privacy laws, you may be entitled to request the categories and specific pieces of personal information that we have collected about you, the categories of sources from which the personal information was collected, the purposes of collecting the personal information, the categories of third parties we have shared the personal information with, and the categories of personal information that have been shared with third parties for a business purpose;
- You may update, correct or amend the personal information we hold about you if it is wrong;
- You may ask us to change, restrict or stop the way in which we communicate with you or process personal information about you;
- You may ask us to delete your personal information;
- You have rights in relation to automated decision making, including profiling which has a legal effect, or which causes a significant effect;
- You may ask us to move, copy or transfer your personal information;
- You may object to our processing of your personal information; and

- You may opt out of the sale of personal information—however, for purposes of California law, we do not sell your personal information to third parties, nor do we intend to, as those terms are defined by California privacy law. In addition, we have contracts with our service providers to prohibit any sale of the personal information we provide them; but if you have any concerns that our third parties might be selling your information, please contact us.