

Last Updated April 1, 2021

General Privacy Notice and Cayman Islands Data Protection Law

The privacy of our investors is very important to Magnitude Capital, LLC (“**Magnitude**”, “**we**”, “**us**”, or “**our**”) and the investment funds we manage (the “**Magnitude Funds**”). This Privacy Notice sets forth the policies of Magnitude with respect to the protection of non-public personal information of current, prospective, and former investors in the Magnitude Funds. Except as otherwise stated below, these policies apply to individuals only and may be changed at any time.

Investors may provide Magnitude and/or the Magnitude Funds with their personal information, such as address, social security number, information about other assets, income information, and other information (i) in subscription documents and related documents; (ii) in correspondence and conversations with Magnitude personnel; and (iii) through transactions in the Magnitude Funds (e.g., subscriptions / redemptions). Magnitude and/or the Magnitude Funds may also collect personal information about investors from third parties that have been authorized by the investor, such as financial advisors, consultants, or other financial institutions. As described below, Magnitude and/or the Magnitude Funds share this information with third parties in certain circumstances in the course of their day-to-day businesses, but otherwise treat the information with the highest standards of confidentiality.

Magnitude and/or the Magnitude Funds may collect, store, and use personal information for lawful purposes, including, in particular: (i) where this is necessary for the performance of rights and obligations under the subscription agreement and/or the constitutional and operational documents of the Magnitude Funds; (ii) where this is necessary for compliance with a legal and regulatory obligation to which Magnitude and/or the Magnitude Funds are subject (such as compliance with anti-money laundering requirements); and/or (iii) where this is necessary for the purposes of Magnitude’s and/or the Magnitude Funds’ legitimate interests, and such interests are not overridden by investors’ interests, fundamental rights, or freedoms.

Magnitude maintains physical, electronic, and procedural safeguards designed to protect the non-public personal information that Magnitude and/or the Magnitude Funds obtain from investors. Magnitude and the Magnitude Funds do not disclose non-public personal information about investors to third parties without the respective investors’ consent, except as described below. Magnitude and/or the Magnitude Funds may disclose non-public personal information in the following circumstances:

- i. To employees and affiliates for day-to-day business purposes;
- ii. To professional representatives of Magnitude or the Magnitude Funds, such as lawyers, accountants, and auditors;
- iii. To third parties that assist in servicing investor accounts, such as an administrator, a sub-administrator, a custodian, a sub-custodian, banks, promoters, placement agents, or comparable parties;
- iv. To representatives of the investor or other third parties at the request of the investor, such as IRA custodians, independent financial advisors, consultants, tax preparers, or other parties; or
- v. Pursuant to a lawful request by a regulatory or law enforcement authority or as required by applicable law or regulation.

Any transfer of personal data received by Magnitude Funds domiciled in the Cayman Islands (the “**Cayman Funds**”) or Magnitude, as the investment manager to the Cayman Funds, or either Magnitude’s or the Cayman Funds’ duly authorized affiliates and/or delegates outside of the Cayman Islands shall be in accordance with the requirements of the Data Protection Law, 2017 of the Cayman Islands (the “**DPL**”). If you are a corporate investor (including, for these purposes, legal arrangements such as trusts or exempted limited partnerships) in a Cayman Fund that provides the Magnitude Funds or Magnitude with personal information on individuals connected to you for any reason in relation to your investment in the Cayman Funds, this will be relevant for, and applicable to, those individuals and you should transmit this document to such individuals or otherwise advise them of its content.

In addition, Magnitude and/or the Magnitude Funds may share investor personal information with other financial companies that perform marketing services on Magnitude's behalf. Investors may contact Magnitude at any time by telephone at +1 212.915.3900 or by email at magnitudecapital@magnitudecapital.com to limit sharing for marketing purposes. Magnitude may begin sharing an investor's information for marketing purposes 30 days from the date the investor receives this Privacy Notice.

State or international laws, including the DPL, as applicable, may give investors additional rights to limit sharing of personal information, as well as grant investors certain rights to obtain access to, or request the correction or deletion of, personal data. Please contact Magnitude at the phone number or email address above for more information about these rights or about Magnitude's or the Magnitude Funds' privacy policies more generally.

Privacy Notice for California Consumers

This notice contains disclosures required by the California Consumer Privacy Act ("**CCPA**"), is only relevant to residents of California, and applies only to the collection or other use of "personal information" that is subject to the CCPA. Consumers with disabilities may access this notice by downloading a PDF of the notice by clicking *here*.

Information We Collect. In the past 12 months, we have collected the following categories of personal information about California consumers:

- i. Identifiers, such as a name, email address, postal address, Social Security number or other similar personal identifiers;
- ii. Other personal information categories, as listed in the California Customer Records statute, such as a signature, telephone number, education, employment, employment history, bank account number or any other financial information, medical information, or health insurance information;
- iii. Protected classification characteristics under California or federal law, such as race, citizenship, marital status or sex;
- iv. Commercial information;
- v. Internet or other similar network activity, such as information on a consumer's interaction with a website, application, or advertisement;
- vi. Geolocation data, such as your IP address when you use our website;
- vii. Professional or employment-related information, such as current or past job history or performance evaluations;
- viii. Non-public education information, such as education records directly related to a student maintained by an educational institution or party acting on its behalf; and
- ix. Inferences drawn from other personal information.

We do not knowingly collect or solicit personal information from anyone under the age of 16.

We collect personal information from the following categories of sources:

- i. Your communications with us;
- ii. Service providers, including, but not limited to, administrators, custodians, lenders, banks, brokers, auditors, law firms, consultants, and recruiting and staffing firms;
- iii. Nonprofit organizations; and
- iv. Government entities.

Use of Personal Information. We may use the personal information we collect for one or more of the following purposes:

- i. Providing you with information about our products and services;
- ii. Providing performance and other updates; and
- iii. One or more of the following business purposes:

- a) Performing services (for us or our service providers) such as account servicing, processing orders and payments, and analytics;
- b) Auditing related to our interactions with you (e.g., counting ad impressions to unique visitors, verifying positioning/quality of ad impressions, etc.);
- c) Legal compliance;
- d) Detecting and protecting against security incidents, fraud, and illegal activity;
- e) Debugging;
- f) Internal research for technological improvement;
- g) Internal operations;
- h) Activities to maintain and improve our services; and
- i) Short-term, transient use, provided that the personal information is not disclosed to another third party and is not used to build a profile about a consumer.

Sharing Personal Information. We may disclose personal information in one or more of the categories identified above to:

- i. Service providers, including but not limited to, administrators, lenders, banks, brokers, auditors, law firms, consultants, and recruiting and staffing firms;
- ii. Our affiliates;
- iii. Legal or government regulatory authorities as required by applicable law; and
- iv. In connection with a potential business transfer.

In the past 12 months, we have not sold any personal information we collect to third parties, and we have shared the categories of personal information we collect only as set forth above.

Rights of California Consumers. The CCPA provides a California consumer the following rights, subject to certain exceptions and limitations:

- i. The right to request (a) the categories and specific pieces of personal information we collect, use, disclose, and sell about you, (b) the categories of sources from which we collected your personal information, (c) our purposes for collecting or selling your personal information, (d) the categories of your personal information (if any) that we have either sold or disclosed for a business purpose, and (e) the categories of third parties with which we have shared personal information;
- ii. For certain categories of personal information, the right to request a list of what personal information (if any) we disclosed to third parties for their own direct marketing purposes in the past 12 months and the names and addresses of those third parties;
- iii. The right to request that we delete the personal information we have collected from you or maintain about you;
- iv. The right to opt out of our sale(s) (if any) of your personal information; and
- v. The right not to receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA.

You may submit requests relating to your exercise of rights under the CCPA to us by phone at +1 212.915.3900 or by email at magnitudecapital@magnitudecapital.com.

We may need to request additional information from you to verify your identity or understand the scope of your request. In verifying requests, we will require you to provide, at a minimum a telephone number and mailing address. If we are unable to verify your identity, we will need to deny your request.

You may designate an authorized agent to make a CCPA request on your behalf by mailing two forms of identification showing your first name, last name, and current address, and a signed authorization allowing an agent to request information on your behalf.