

Privacy Policy

This Privacy Notice is provided by Directional Financial Services, LLC (“Directional”), an independent investment management firm, which is committed to safeguarding the confidential information of our clients. This notice applies to ways in which we interact with individuals, (“**Clients**” or “**Prospective Clients**”) in connection with our business, including, without limitation:

- directors, officers, employees, and other representatives of portfolio companies in which Directional has made an investment or is considering making an investment
- individual representatives of third-party sellers, placement agents, finders, investment bankers, consultants, lawyers, accountants, advisers, and other service providers, whether or not engaged by Directional
- directors, officers, employees, and other representatives of Directional
- individuals applying for or enquiring about employment with us
- individuals who consider or do invest with us and their representative agents with whom we interact during the normal course of business
- visitors to our websites and users of any digital services we provide

We respect the privacy of Clients or Prospective Clients. This Privacy Notice describes how we collect, use, store, process, disclose, and transfer information that we may collect from Clients or Prospective Clients. Please note that Directional may provide additional privacy notices or similar disclosures in respect of certain categories of Clients or Prospective Clients (e.g., certain investors or prospective investors in a fund managed or advised by Directional, certain former or existing employees associated with Directional, etc.), and certain geographies and jurisdictions.

We do collect personal information in order to open and administer your accounts with us and to provide you with accurate and pertinent advice. We hold all personal information you provide to us in the strictest confidence. We do not disclose information to nonaffiliated third parties, except as permitted by law, and do not anticipate doing so in the future. If we were to change our firm policy, we would be prohibited under the law from doing so without advising you first. As you know, we use financial information that you provide to us to help you meet your personal and professional financial goals. Our policy with respect to personal information about you is set forth below.

- We do not sell your personal information to anyone or provide your personally identifiable information to mailing list vendors or solicitors for any purpose.
- We limit employee and agent access to information only to those who have a business or professional reason for knowing, and only to nonaffiliated parties as permitted by law. (For example, federal regulations permit us to share a limited amount of information about you with a brokerage firm in order to execute securities transactions on your behalf, or so that our firm can discuss your financial situation with your accountant or lawyer, with your permission.)
- We will provide notice of changes in our information sharing practices. If, at any time in the future, it is necessary to disclose any of your personal information in a way that is inconsistent with this policy, we will give you advance notice of the proposed change so you will have the opportunity to opt out of such disclosure.
- We strive to maintain a secure office and computer environment so that your information is not placed at unreasonable risk. We run background checks on all employees when they are hired, and each employee completes a disciplinary attestation annually thereafter. We have established shredding procedures for properly disposing of consumer information which is contracted through a reputable

company that specializes in securely shredding confidential documents and provides us with a Certificate of Destruction. We have a password-protected, encrypted website for clients to send/receive confidential information. Our office alarm codes and computer passwords are deactivated promptly for terminated employees. We require strict confidentiality agreements to be signed by all employees. Our systems that record and use client information are encrypted, password protected, web-based software designed to protect client confidentiality.

- For unaffiliated third parties that require access to your personal information, including financial service companies, consultants, and auditors, we also require strict confidentiality in our agreements with them and expect them to keep this information private. Federal and state regulators also may review firm records as permitted under law.
- Directional only shares the nonpublic personal information of its Clients with unaffiliated entities or individuals (i) as permitted by law and as required to provide services to Directional's Clients, such as with representatives within our firm, securities clearing firms, insurance companies, and other services providers of Directional, or (ii) to comply with legal or regulatory requirements. Directional may also disclose nonpublic personal information to another financial services provider in connection with the transfer of an account to such financial services provider. Further, in the normal course of business, Directional may disclose information it collects about Clients to entities or individuals that contract with Directional to perform servicing functions such as recordkeeping or computer-related services. Finally, Directional may make good faith disclosure of the nonpublic personal information of its Clients to regulators who have regulatory authority over Directional.
- Personally identifiable information about you will be maintained during the time you are a client, and for the required time thereafter that such records are required to be maintained by federal and state securities laws.

(If you identify an inaccuracy in your personal information, please contact us so we may promptly update our records.)

Customer Identification Program Notice

Important Information You Need to Know

To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify, and record information that identifies each person who opens an account.

This notice answers some questions about Directional Financial Services' Customer Identification Program.

What types of information will I need to provide?

When you open an account, Directional Financial Services is required to collect the following information:

- ✓ Name
- ✓ Date of birth
- ✓ Address
- ✓ Identification number:

- *U.S. citizen: taxpayer identification number (Social Security number or Employer Identification number)*
- *Non-U.S. citizen: Taxpayer Identification number; Passport number and country of issuance; alien identification card number; or government-issued identification showing nationality, residence and a photograph of you.*

You will also need to show your driver's license or other identifying documents.

A corporation, partnership, trust, or other legal entity may need to provide other information, such as its principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, a partnership agreement, or a trust agreement.

U.S. Department of the Treasury, Securities and Exchange Commission, NASD and New York Stock Exchange rules already require you to provide most of this information. These rules also may require you to provide additional information, such as your net worth, annual income, occupation, employment information, investment experience and objectives, and risk tolerance.

How do we protect your Personal Data?

We take seriously the obligation to safeguard your Personal Data. Your Personal Data held by us will be kept confidential in accordance with applicable Directional policies and procedures. We will use all reasonable efforts to ensure that all Personal Data is kept secure and safe from any loss or unauthorized disclosure or use. All reasonable efforts are made to ensure that any Personal Data held by us are stored in a secure and safe place, and accessed only by our authorized employees and transferees.

What happens if I don't provide the information requested or my identity can't be verified?

Directional Financial Services may not be able to open an account or carry out transactions for you. If Directional Financial Services has already opened an account for you, it may risk having to be closed.

We thank you for your patience and hope that you will support the financial industry's efforts to deny terrorists and money launderers access to America's financial system.