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## PRIVACY POLICY

The Company is committed to safeguarding Client' non-public personal information and in general, will not disclose such information, except where disclosure of the same is required for purposes of the Company's ordinary business operations (i.e., to third party service providers, including, without limitation, attorneys, accountants, administrators, broker-dealers, trading advisors, and account custodians, engaged by the Company), to comply with judicial process, or where the Partner has previously authorized the Company to make such disclosures. Non-public personal information shall include, without limitation, information and records pertaining to a Client's personal background, investment objectives, financial situation, investment holdings, account numbers, account balances, and the like (collectively, "Personal Information").

This Privacy Policy describes how the Company and its affiliates handle and protect Personal Information collected by the Company as part of the investment process. The provisions of this policy apply to prospective, current, and former Client of the Company.

### Privacy of Your Personal Information, Generally

The Company takes reasonably prudent steps to keep confidential all Personal Information pertaining to each Client unless (a) the Company is previously authorized to disclose such information to individuals and/or entities not affiliated with the Company, including, but not limited to, the Client's other professional advisors and/or service providers (i.e., attorneys, accountants, administrators, broker-dealers, trading advisors, account custodians, and others independently engaged by the Client); (b) required to do so by judicial or regulatory process; or, (c) otherwise permitted to do so in accordance with the parameters of Regulation S-P.

The disclosure by the Company and/or its affiliates of any Personal Information provided by a Client in any document completed by such Client for processing and/or transmittal by the Trading Advisor, Company, or their affiliates in order to facilitate the commencement, continuation, or termination of an investment in the Company (or other business relationship between the aforesaid parties) shall be deemed as having been automatically authorized for dissemination by the Client with respect to disclosure to corresponding non-affiliated third party service providers of the Company (i.e., attorneys, accountants, administrators, broker-dealers, trading advisors, account custodians, and the like). Each third party service provider engaged by the Company is aware of the aforesaid privacy policy and has acknowledged his or her or its independent requirement to comply with the same. In accordance with this privacy policy, each such third party service provider shall have access to Personal Information to the extent reasonably necessary for the performance of its service for the Client/investor and the Company generally and to comply with regulatory procedures and requirements.

### Why and How the Company Collects Personal Information

When Client applies for or maintains an account with the Company, the Company collects Personal Information about the Client for business purposes, such as evaluating Client needs, processing Client requests and transactions, informing Client about products and services that may be of interest to a Client, and providing customer service.

## Types of Personal Information Collected by the Company

The Personal Information we collect about Client may include:

- information provided to the Company on agreements, applications, and other forms, such as the investor's name, address, date of birth, social security number, occupation, assets, investment experience, and income;
- information about Client transactions with the Company and with the Company's affiliates;
- information the Company receives from consumer reporting agencies and/or other entities not affiliated with the Company; and
- information Client provides to the Company to verify identity, such as a passport or driver's license, or received from other entities not affiliated with the Company.

## How the Company Protects Personal Information

The Company limits access to Personal Information it has received from Client to those employees who need to know in order to conduct Company business and/or to service the Client's account. Employees of the Company are required to maintain and protect the confidentiality of Client's Personal Information and are instructed to follow established procedures to do so. The Company maintains physical, electronic, and procedural safeguards to protect Client's Personal Information. The Company does not rent or sell Client's names or Personal Information to anyone.

## Sharing Information With Company's Affiliates

The Company may share Personal Information described above with its affiliates for business purposes, such as servicing Client accounts and/or informing Client about new products and services, and as permitted by applicable law.

The information the Company shares with its affiliates for marketing purposes may include the Personal Information described above, such as name, address and account information.

## Disclosure to Non-Affiliated Third Parties

Except as required to conduct the Company's ordinary business operations (by sharing Personal Information with non-affiliated third party service providers engaged by the Company), Personal Information shall not be shared with any non-affiliated third parties without first obtaining the authorization of the underlying Client.

Notwithstanding the foregoing, the Company may disclose Personal Information to non-affiliated companies and regulatory authorities as permitted or required by applicable law. For example, the Company may disclose Personal Information to cooperate with regulatory authorities and law enforcement agencies to comply with subpoenas or other official requests, and as necessary to protect the Company's rights or property. Except as described in this Privacy Policy, the Company will not use Client's Personal Information for any other purpose unless the Company describes how such information will be used at the time the Client discloses it to the Company or the Company obtains the Client's permission to do so.

### Accessing and Revisiting Client Personal Information

The Company endeavors to keep Client files complete and accurate. The Company will give Client reasonable access to the information the Company has about the Client requesting the same. Most of this information is contained in account statements that Client receive from the Company and applications that Client submit to obtain Company products and services. The Company encourages Client to review this information and notify the Company if any Client believes any information should be corrected or updated. If Client have a question or concern about their personal information or this privacy notice, please contact the Company.

### Right to Opt Out

Client has the right to opt out of with respect to Company's ability to share Client's personal information with the Company's affiliates. If you desire that the Company not share Client's Personal Information in this manner, please send an e-mail to the manager of the Company, **Christopher Covato** (**cc@covatocapital.com**), with "Privacy Policy Opt Out" in the subject line. Within 48 hours of receipt of such opt-out e-mail, the Company will cease sharing any of your Personal Information with its affiliates.