

Annual Privacy Notice

Provenio Capital Management Inc. (the “Firm”) provides current and prospective clients with the following information about their privacy policies for protecting the personal information of their current, former and prospective clients.

The Firm collects personal information (which includes public and non-public personal information), such as name, address, social security number, birth date, assets, income and investment experience, about current, former and prospective clients. This information is compiled from (i) Client Questionnaires; (ii) Investment Management Agreements completed by such persons; (iii) transactions between such persons and the Firm (e.g., account activity and balances); (iv) Subscription Documents for clients investing in private funds managed by third party advisers; and (v) other third-party sources (e.g., credit reporting agencies).

Personal information is not shared with any unaffiliated third parties for their marketing purposes. The Firm will use, disclose and otherwise process personal information for their business, administrative and marketing purposes. The Firm also may reveal personal information in their possession about clients to their regulators and appropriate government agencies, as necessary and permissible under applicable laws, in connection with legal proceedings or otherwise to assert and protect their legal interests or as part of a corporate transaction with a successor or affiliate. The Firm restricts access to such personal information to their personnel, their affiliates and affiliates’ personnel, their service providers and their outside counsel, auditors and other independent professionals who need to know that information.

The Firm maintains appropriate administrative, technical, and organizational controls to safeguard such personal information, although such safeguards may not prevent all breaches of information security. If the security of personal information is compromised, the affected individuals will receive notice of the data security incident where required by and consistent with applicable law.

Individuals may exercise their rights under applicable law to access such personal information as is held by the Firm, to rectify or delete any personal information which is factually incorrect, incomplete or irrelevant for the purpose for which it is processed and to raise any queries or concerns as to the use of their personal information, including making a request not to receive marketing materials, by contacting the Firm.

In order to use and disclose such personal information for the purposes described above, such personal information may be transferred internationally to countries which the European Union has deemed not to provide adequate data protection. Current, former and prospective clients recognize the necessity of such international processing of personal information and consent to such international transfers of personal information, including social security and taxpayer identification numbers, as the Firm deems appropriate. The Firm will ensure application of the same standards of privacy protection as set out in this privacy policy regardless of the country in which such personal information is processed.

The policy is effective as of the date of the Investment Management Agreement. If, at any time in the future, it is necessary to disclose any investor’s personal information in a way that is materially inconsistent with this policy, the Firm will give such client written notice of the change and, where required under applicable law, obtain consent to such change.