

**YOU HAVE BEEN DIRECTED TO THIS NOTICE BECAUSE YOU HOLD AN INTEREST IN A CAYMAN ISLANDS-DOMICILED LIMITED PARTNERSHIP OR COMPANY (EACH, A "FUND"). THE FOLLOWING NOTICE APPLIES TO YOUR INVESTMENT(S) IN SUCH ALTERNATIVE INVESTMENT FUND(S).**

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## **Fund Privacy Notice**

### **Introduction**

The purpose of this notice is to provide you with information on our use of your personal data in accordance with the Cayman Islands Data Protection Law, 2017 (the "DPL"). The DPL, effective September 30, 2019, is applicable to individual persons associated with the Cayman Island-domiciled funds offered by J.P. Morgan. The DPL is based on a set of internationally recognized privacy principles, and provides a framework of rights and duties designed to give individuals greater control over their personal data. This does not change the manner in which we use or intend to use your personal data.

In this document, "we," "us" and "our" refers to the Fund, the General Partner or Directors of each Fund, and the administrator and/or investment adviser (as applicable) and their affiliates and/or delegates.

### **Investor Data**

By virtue of making an investment in the Fund and your associated interactions with us (including any capital commitment and/or capital contribution (whether past, present or future) and the recording of electronic communications or phone calls where applicable) or by virtue of you otherwise providing us with personal information of individuals connected with you as an investor (for example directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners or agents), you will provide us with certain personal information that constitutes personal data within the meaning of the DPL ("**Investor Data**"). We may also obtain Investor Data from other public sources. Investor Data includes, without limitation, the following information relating to you and/or any individuals connected with you as an investor: name, residential address, email address, contact details, corporate contact information, signature, nationality, place of birth, date of birth, tax identification, credit history, correspondence records, passport number, bank account details, source of funds details and details relating to your investment activity.

In our use of Investor Data, the Fund will be characterised as a "data controller" for the purposes of the DPL. The Fund's and the General Partner's/Directors' affiliates and delegates may act as "data processors" for the purposes of the DPL.

### **Who this Affects**

If you are a natural person, this will affect you directly. If you are a corporate investor (including, for these purposes, legal arrangements such as trusts or exempted limited partnerships) that provides us with Investor Data on individuals connected to you for any reason in relation to your investment with us, this will be relevant for those individuals and you should transmit this document to such individuals or otherwise advise them of its content.

### **How We May Use Your Personal Data**

The Fund, as the data controller, may collect, store and use Investor Data for lawful purposes, including, in particular:

- (i) Where this is necessary for the performance of our rights and obligations under the Subscription Agreement and/or the constitutional and operational documents of the Fund or the General Partner/Directors;
- (ii) Where this is necessary for compliance with a legal and regulatory obligation to which the Fund or the General Partner/Directors is subject (such as compliance with anti-money laundering and FATCA/CRS requirements); and/or
- (iii) Where this is necessary for the purposes of our legitimate interests and such interests are not overridden by your interests, fundamental rights or freedoms.

The Fund's service providers, including the administrator, may use Investor Data, for example to provide its services to the Fund and the General Partner/Directors or to discharge the legal or regulatory requirements that apply directly to it or in respect of

which the Fund and the General Partner/Directors relies upon the Administrator, but such use of Investor Data by the Administrator will always be compatible with at least one of the aforementioned purposes for which we process Investor Data.

Should we wish to use Investor Data for other specific purposes (including, if applicable, any purpose that requires your consent), we will contact you.

### **Why We May Transfer Your Personal Data**

In certain circumstances we and/or our authorised affiliates or delegates may be legally obliged to share Investor Data and other information with respect to your interest in the Fund with the relevant regulatory authorities such as the Cayman Islands Monetary Authority or the Tax Information Authority. They, in turn, may exchange this information with foreign authorities, including tax authorities.

We anticipate disclosing Investor Data to parties who provide services to the Fund and their respective affiliates (which may include certain entities located outside the Cayman Islands or the European Economic Area), who will process your personal data on our behalf. Such parties may include, to the extent applicable:

- (i) The Fund's administrator and/or sub-administrator, as set forth in the Fund offering documents; and
- (ii) The Fund's investment adviser, accountants, auditors, custodians, depositories, financial advisors, lawyers and other outside professional advisors to the Fund.

### **The Data Protection Measures We Take**

Any transfer of Investor Data by us or our duly authorised affiliates and/or delegates outside of the Cayman Islands shall be in accordance with the requirements of the DPL.

We and our duly authorised affiliates and/or delegates shall apply appropriate technical and organisational information security measures designed to protect against unauthorised or unlawful processing of Investor Data, and against accidental loss or destruction of, or damage to, Investor Data.

We shall notify you of any Investor Data breach that is reasonably likely to result in a risk to the interests, fundamental rights or freedoms of either you or those data subjects to whom the relevant Investor Data relates.

### **Getting In Touch**

Should you have any queries or wish to discuss your data protection rights with us, email your relevant Privacy Team at [namr.am.data.privacy.control@jpmorgan.com](mailto:namr.am.data.privacy.control@jpmorgan.com) for Asset Management or [privacy.info@legal.jpmchase.com](mailto:privacy.info@legal.jpmchase.com) for the J.P. Morgan Private Bank.