

FAR HILLS GROUP

PRIVACY NOTICE FOR EUROPEAN DATA SUBJECTS

1. INTRODUCTION

- 1.1 Far Hills Group LLC (“FHG”) considers your privacy and the protection of personal data to be an utmost concern and has implemented this Privacy Policy. We will use personal data about you only for the purposes and in the manner set forth below, which describes the steps we take to ensure the processing of personal data is in compliance with European Union Law including Regulation (EU) 2016/679, known as the General Data Protection Regulation or GDPR, and any subsequent amendments (collectively referred to as “**Data Protection Legislation**”). This legislation is intended to ensure that all personal information which might allow you, as an individual (“Data Subject”), to be identified is accurate, secure and there is no mis-use of personal information.
- 1.2 As a European Data Subject, this Privacy Policy provides detail about FHG’s privacy practices, how and why we process your personal data, and how we comply with the Data Protection Legislation. This Privacy Policy only applies to you to the extent that the Data Protection Legislation applies to the processing of your personal data and contains information about your rights in relation to your personal data under Data Protection Legislation.
- 1.3 When you contact FHG, and when we provide any services to you, FHG may collect personal data about you from information you provide. This can include the following information relating to you: name, business contact data, email address, and correspondence records. If you are an investor in a fund marketed by FHG, you may be asked for additional personal information required for regulatory and legal purposes. We may combine the personal data that you provide to us with personal data that we collect about you from third parties that provide publicly available data and other public sources. The personal data collected about you will help us provide you with better service and facilitate our business relationship. Please read this Privacy Notice carefully to understand our treatment and use of personal data.
- 1.4 In this Privacy Notice, references to “**you**” means the person about whom we collect, use and process personal information and not to any legal entity (such as your employer) which you may be representing. In this Privacy Notice, processing is defined in Article 4 of the GDPR
- 1.5 We seek to maintain the privacy, accuracy, and confidentiality of data (including personal data about you) that we collect and use concerning our customers.

2. IDENTITY OF THE CONTROLLER OF PERSONAL INFORMATION

When you provide us with your personal data, Far Hills Group, LLC, a U.S. company, with its principal place of business at 747 Third Avenue, 30th Floor, New York, NY 10017, will be acting as a Data Controller for the purposes of Data Protection Legislation. In simple terms, this means that we “control” the personal data that you provide, including making sure that it is kept secure, and we make certain decisions on how to use and protect your personal data, but only to the extent that we have informed you about the use or are otherwise permitted by law to use the data.

3. WHEN DOES THIS PRIVACY NOTICE APPLY

This Notice applies to personal information that we collect, use and otherwise process about you in connection with the following relationship with us.

- as an investor in one or more alternative investment products marketed by Far Hills Group LLC. This may relate to you, if you are an individual, or to your individual representative and/or ultimate beneficial owner (if required).
- as a representative of a prospective professional investor in one or more of the alternative investment products we market

4. PROCESSING OF YOUR PERSONAL DATA

4.1 The personal data we collect from you helps us manage our relationship with you, by allowing us to keep you informed of the investment products we are marketing and to assist in the placement of alternative investment offerings. We also collect the data to comply with our legal and regulatory obligations, as well as for the conduct of our business. We may also obtain personal information on you from other public sources or third parties that provide publicly available data. The personal data we collect, the basis of processing and the purposes of processing are detailed below. Sometimes, these activities are carried out by third parties (see “Sharing of Personal Data” section below).

Category of Data Subject	Types of Personal data obtained	Basis and purpose of processing
Representatives of Prospective Professional Investors	Personal data may include name, employer, corporate contact information, corporate email address and investment experience.	It is necessary for our legitimate business interests, or those of a third party, in order to respond to queries, provide you with, and inform you about, the investment products we market and send direct marketing communications to you. We only rely on legitimate interest where we have considered that, on balance, we have a legitimate business interest to process your personal data.
Investors	Personal data about you, your representative or Beneficial Owners (if required) may include name, date of birth, address, employment information, email address, photo identification or driver's license, passport number or other identification number, income, net worth, assets, investment experience, source of funds, and banking details.	It is necessary to comply with legal and regulatory obligations to which we are subject such as, investor due diligence, carry out verification for KYC terrorist financing and AML checks, verify the identity and addresses of investors (and, if applicable, their beneficial owners), comply with requests from regulatory, governmental, and law enforcement authorities, and maintain records in accordance with regulatory and legal requirements and to facilitate disaster recovery.

Direct marketing as described above

We may process your personal data for direct marketing purposes:

- To provide you with information, products and services that may be of interest to you
- When raising investments into one of the alternative investment products we are marketing
- When inviting you to an event which may be of interest to you

You have a right at any time to stop us from contacting you for marketing purposes.

If you object to the processing of your personal data for direct marketing purposes, we will stop using your personal data for these purposes. If you no longer wish to be contacted for marketing purposes please contact us at privacy@farhills.com or select the *update your preferences* link in any marketing emails you receive from us to opt-out.

4.2 Where does FHG obtain my personal data from?

From Whom do we collect this data	Where we obtain the personal data
Personal data that you provide us	<ul style="list-style-type: none"> • Personal data obtained during the subscription process, either directly from you or through the Fund Administrator such as subscription documents and identification documents. • When you provide it to us through correspondence and conversations.
Personal data we obtain from others	<ul style="list-style-type: none"> • Publicly available and accessible directories and sources such as company corporate websites, LinkedIn and news alerts as well as databases that provide publicly available data for the alternative assets industry. • Governmental and competent regulatory authorities

We generally do not rely on obtaining your consent to process your personal data but rather rely on other lawful bases for processing. In some circumstances, we may request your explicit consent to process (specific types of) personal data. In the event consent is obtained, you have the right to withdraw consent at any time by following the instructions provided when you gave consent, by using the contact details below or by selecting the update your preferences link in any marketing emails you receive from us to opt-out.

5. SHARING OF PERSONAL DATA

5.1 Service Providers

We use third party service providers who provide services including compliance and IT. In providing the services, your personal data will, where applicable, be processed by the service provider on our behalf.

We will check any third party that we use to ensure that they can provide sufficient guarantees regarding the confidentiality and security of personal data about you. We will have written contracts with them which provide assurances regarding the protections that they will give to personal data about you and their compliance with our data security standards and international transfer restrictions.

5.2 Disclosures to Third Parties

In certain circumstances, we share and/or are obliged to share your personal data with third parties for the purposes described above and in accordance with Data Protection Legislation.

These third parties include:

- regulatory authorities;
- financial institutions;
- auditors;
- investment managers of the products we are marketing;
- external professional advisors; and
- others, where it is permitted by law, or where we have your consent.

6. TRANSFERS OUTSIDE THE EUROPEAN ECONOMIC AREA

6.1 Your personal information may be transferred, stored and processed in the United States, Canada, and other jurisdictions outside the European Economic Area (“EEA”). For transfers of personal data about you outside of the EEA, we take additional steps in line with Data Protection Legislation. We have put in place adequate safeguards with respect to the protection of your privacy, fundamental rights and freedoms, and the exercise of your rights,

e.g., we establish an adequate level of data protection through EU Standard Contractual Clauses based on the EU commission's model clauses.

6.2 If you would like to see a copy of any relevant provisions, please contact us (see "Contact Us" section below).

7. HOW IS MY PERSONAL DATA SECURED

7.1 FHG operates and uses appropriate technical and physical security measures to protect your personal data.

7.2 We have, in particular, taken appropriate security measures to protect personal data about you from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access, in connection with the customer relationship. Access is only granted on a need-to-know basis to those people whose roles require them to process personal data about you. In addition, our service providers are selected carefully and are required to use appropriate protective measures.

8. STORAGE OF PERSONAL DATA

8.1 We will keep personal data about you for as long as it is necessary to fulfil the purposes for which it was collected as described above and in accordance with our legal and regulatory obligations. This may mean that some information is held for longer than other information. The criteria we use to determine data retention periods for personal data includes the following:

- Retention in case of queries; we will retain it for a reasonable period after the relationship between us has ceased;
- Retention in case of claims; we will retain it for the period in which it may be enforced (this means we will retain it for 10 years in some instances); and
- Retention in accordance with legal and regulatory requirements;

8.2 If you would like further information about our data retention practices, please contact us (see "Contact Us" section below).

9. YOUR RIGHTS

9.1 You may have various rights under data protection legislation in your country (where applicable).

These may include (as relevant):

Your right	What does it mean?	How do I execute this right?	Conditions to exercise?
Right of access	Subject to certain conditions, you are entitled to have access to your personal data which we hold.	Requests for such information should be made in writing to privacy@farhills.com . If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations.	We must be able to verify your identity. Your request may not affect the rights and freedoms of others, e.g., privacy and confidentiality rights of other customers. Data solely retained for data backup and archiving purposes is principally excluded.

Right of data portability	Subject to certain conditions, you are entitled to receive the data which you have provided to us in a commonly-used machine readable format.	Requests should be made in writing to privacy@farhills.com . If possible, you should specify the type of information you would like to receive to ensure that our disclosure is meeting your expectations.	The GDPR does not establish a general right to data portability. This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (e.g., not for paper records). It affects only personal data that was "provided" by you. Hence, it does not, as a rule, apply to personal data that was created by FHG or obtained from other sources.
Rights in relation to inaccurate personal or incomplete data	You may challenge the accuracy or completeness of personal data which we process about you. If it is found that personal data is inaccurate, you are entitled to have the inaccurate data removed, corrected or completed, as appropriate.	We encourage you to notify us of any changes regarding personal data about you as soon as they occur. Requests should be made in writing to privacy@farhills.com .	This right only applies to personal data about you. When exercising this right, please be as specific as possible.
Right to object to or restrict our data processing	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of personal data about you.	Requests should be made in writing to privacy@farhills.com .	This right applies only if the processing of personal data about you is explicitly based on our so-called "legitimate interests" (see " <i>basis of processing</i> " above). Objections must be based on grounds relating to your particular situation. They must not be generic.
Right to have personal data erased	Subject to certain conditions, you are entitled, on certain grounds, to have your personal data erased (also known as the " <i>right to be forgotten</i> "), e.g., where you think that the information we are processing is inaccurate, or the processing is unlawful.	Requests should be made in writing to privacy@farhills.com .	There are various lawful reasons why we may not be in a position to erase personal data about you. This may apply (i) where we have to comply with a legal obligation, (ii) in case of exercising or defending legal claims, or (iii) where retention periods apply by law or our statutes.

Right to withdrawal	You have the right to withdraw your consent to any processing for which you have previously given that consent.	Requests should be made in writing to privacy@farhills.com or by clicking on the email preference link contained in the email you received from Far Hills Group.	If you withdraw your consent, this will only take effect for the future.
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10. YOUR RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

10.1 Without prejudice to any other administrative or judicial remedy you might have, you may have the right under data protection legislation in your country (where applicable) to lodge a complaint with the relevant data protection supervisory authority in your country if you believe that we have infringed applicable data protection legislation when processing personal data about you. This means the country where you are habitually resident, where you work or where the alleged infringement took place.

11. CHANGES TO THIS INFORMATION

11.1 We reserve the right to change this Privacy Notice at any time at our sole discretion. If we make changes, we will provide notice via email and post the revised policy to our website www.farhills.com, so that you can see what information we gather, how we might use that information and in what circumstances we may disclose it. By continuing to use our services after notice is provided, you accept and agree to this Privacy Notice as modified.

12. DO NOT TRACK

12.1 Some web browsers incorporate a “do not track” feature that, when enabled, signals to websites and online services that you do not wish to be tracked. Because there is not yet an accepted standard for how to respond to such a do-not-track signal, we do not recognize or respond to these signals.

13. CONTACT US

13.1 We take your concerns very seriously. For further information or if you have any questions or queries about this Privacy Notice, please contact us by emailing privacy@farhills.com.