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# GDPR Privacy Policy

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## Introduction

Strategic Alternative Funds Group, LLC and its affiliates (collectively, the “Company”), are data controllers with respect of your personal data for the purposes of applicable data protection laws, such as the European Union’s General Data Protection Regulation (“GDPR”). The Company is responsible for ensuring that it uses your personal data in compliance with such data protection laws. The Company will generally process personal data provided to it in connection with a potential investment or consummated investment in one or more of the third party investment offerings, that are not sponsored by the Company, but are operationally supported by the Company for investment processing on the technology platform of the Company (an “Investment”).

This privacy notice applies to you if you are an individual in the European Economic Area and (i) you have been or are contacted by the Company in connection with an Investment, (ii) in certain circumstances, your personal data has been provided to the Company by another person (such as where you are a director, partner, trustee, employee, agent or direct or indirect owner of an investor) in connection with an Investment or (iii) in certain circumstances, the Company otherwise has or uses your personal data. This privacy notice sets out the basis on which personal data about you will be processed by the Company.

*If you are an individual*, please take the time to read and understand this privacy notice.

*If you are an entity or other body*, you must pass this privacy notice to all individuals whose personal data you have provided (or will provide) to the Company. These will include, for example, individuals whose information has been provided to the Company to determine the eligibility and suitability of an investor, individuals who are authorized to give instructions regarding your Investment, and individuals who have communicated with the Company. Passing on this privacy notice to these individuals will help to ensure compliance by the Company with its legal obligations.

## Personal data that the Company might use

The Company might process the following personal data about you:

- (a) Information provided to the Company by you or (if different) the investor: This might include your name and address, contact details, date of birth, gender, nationality, photograph, signature, occupational history, job title, income, assets, other financial information, bank details, investment history, tax residency and tax identification information. Such information might be provided in a subscription agreement or in other documents (in connection with your subscription, continued

investment or at other times), face-to-face, by telephone, by email or otherwise.

- (b) Information that the Company collects or generates: This might include information relating to your (or, if different, an investor's) emails (and related data), call recordings and website usage data.
- (c) Information that the Company obtains from other sources: This might include information obtained by the Company to form a substantive pre-existing relationship prior to an Investment, information from public websites and other public sources and information received from your (or, if different, the investor's) advisers or from intermediaries.

## **Uses of your personal data**

Your personal data may be stored and processed by the Company for the following purposes:

- (a) Assessing and processing your Investment, transaction requests in the applicable Investments and other share or interest dealings, including eligibility, performing know-your-client procedures, automatically exchanging information for tax purposes (e.g., under FATCA or CRS) issuing and redeeming shares or interests, receiving payments from and making payments to the investor or intermediaries, calculating net asset value, and overseeing these processes.
- (b) General business administration, including communicating with and servicing of investors, communicating with service providers and counterparties, accountancy and audit services, risk monitoring, the administration of IT systems and monitoring and improving products.
- (c) Compliance with legal and regulatory obligations and industry standards, including know-your-client procedures, the automatic exchange of tax information and legal judgments.
- (d) With respect to the business activities relating to the Company, such as investor relations, discussions with the service providers and counterparties of the Investments, decision-making, business strategy and development and marketing in relation to the Investments.

The Company is entitled to process your personal data in these ways for the following reasons:

- (a) If you are the potential investor, you may enter into an investment contract with the Company and/or with one or more of the Investments and some processing will be necessary for the performance of such contracts, or will be done at your request prior to entering into such contracts.
- (b) Processing may be necessary to discharge a relevant legal or regulatory obligation.
- (c) The processing will, in all cases, be necessary for the legitimate business interests of the Company, the Investments in which you or your interested party has an

investment, the applicable Investments administrator or another person, such as:

- i. carrying out the ordinary or reasonable business activities of the Company, the applicable Investment's administrator or other persons, or other activities previously disclosed to the applicable Investment's investors or referred to in this privacy notice;
  - ii. ensuring compliance with all legal and regulatory obligations and industry standards, and preventing fraud;
  - iii. establishing, exercising or defending legal rights or for other purposes relating to legal proceedings; and
  - iv. ensuring the security of information systems.
- (d) In respect of any processing of sensitive personal data falling within special categories, such as any personal data relating to the political opinions of a politically exposed person, the processing will be necessary for reasons of substantial public interest.

### **Disclosure of your personal data to third parties**

The Company may from time to time, in accordance with the purposes described above, disclose your personal data to other parties, including (a) the applicable Investment's administrator and its affiliates, (b) professional advisers such as law firms and accountancy firms, (c) other service providers of the Company, including technology service providers, (d) counterparties and (d) courts and regulatory, tax and governmental authorities. Some of these persons will process your personal data in accordance with the Company's instructions and others will themselves be responsible for their use of your personal data. These persons may be permitted to further disclose the personal data to other parties.

### **Transfers of your personal data outside the European Economic Area**

Your personal data may be transferred to and stored by persons outside the European Economic Area (the "EEA"), and in particular may be transferred to and stored by affiliates or service providers of the Investment or the Investment's administrator outside the EEA.

Where personal data is transferred outside the EEA by the Company, the Company will take appropriate safeguards with respect to such transfer. For example, the country to which the personal data is transferred may be approved by the European Commission, the recipient may have agreed to model contractual clauses approved by the European Commission that oblige them to protect the personal data, or the recipient may be located in the United States and be a certified member of the EU-US Privacy Shield scheme.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA by contacting the Company using the details set out under "Contacting the Company" below.

### **Necessity of personal data for your Investment**

The provision of certain personal data is necessary for compliance by the Company and its service providers with certain legal and regulatory obligations. Accordingly, if certain

personal data is not provided when requested, a subscription for shares or interests might not be accepted or shares or interests might be compulsorily redeemed.

## **Retention of personal data**

How long the Company holds your personal data for will vary. The retention period will be determined by various criteria, including the purposes for which the Company is using it (as it will need to be kept for as long as is necessary for any of those purposes) and legal obligations (as laws or regulations may set a minimum period for which the Company has to keep your personal data).

## **Your rights**

You have a number of legal rights in relation to the personal data that the Company holds about you. These rights include the following:

- (a) The right to obtain information regarding the processing of your personal data and access to the personal data that the Company holds about you.
- (b) In some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and the right to request that the Company transmits that data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to the Company.
- (c) The right to request that the Company rectifies your personal data if it is inaccurate or incomplete.
- (d) The right to request that the Company erases your personal data in certain circumstances. Please note that there may be circumstances where you ask the Company to erase your personal data, but the Company is legally entitled to retain it.
- (e) The right to object to, and the right to request that the Company restricts, its processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask the Company to restrict, its processing of your personal data but the Company is legally entitled to continue processing your personal data or to refuse that request.
- (f) The right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by the Company.

You can exercise your rights by contacting the Company using the details set out under “Contacting the Company” below. You can find out more information about your rights by contacting an EU data regulator such as the UK’s Information Commissioner’s Office, or by searching their website at [ico.org.uk](https://ico.org.uk).

## **Contacting the Company**

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please contact the Company at +1-646-883-4770 or at [info@safplatform.com](mailto:info@safplatform.com).