



<b>FACTS</b>	<b>WHAT DOES PROSPECT RIDGE ADVISORS LLC (“PROSPECT RIDGE”) DO WITH YOUR PERSONAL INFORMATION?</b>
<b>Why?</b>	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
<b>What?</b>	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>• Social Security number</li> <li>• Account balances</li> <li>• Transaction history</li> <li>• Name, address and any other additional information disclosed to us in a Subscription Agreement</li> <li>• Income</li> <li>• Investment experience</li> <li>• Wire Transfer Instructions</li> </ul> <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>
<b>How?</b>	All financial companies need to share customer’s personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customer’s personal information; the reasons Prospect Ridge chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Prospect Ridge share?	Can you limit this sharing?
<b>For our everyday business purposes –</b> such as to process your transactions, maintain your account(s) or respond to court orders and legal investigations	Yes	No
<b>For our everyday business purposes –</b> to report to credit bureaus	No	We don’t share
<b>For our marketing purposes –</b> to offer our products and services to you	No	We don’t share
<b>For joint marketing with other financial companies</b>	No	We don’t share
<b>For our affiliates’ everyday business purposes –</b> information about your transactions and experiences	Yes	No
<b>For our affiliates’ everyday business purposes –</b> information about your creditworthiness	No	We don’t share
<b>For nonaffiliates to market to you</b>	No	We don’t share

<b>Questions?</b>	Call Prospect Ridge at 212-655-7100
-------------------	-------------------------------------

Page 2	
Who we are	
Who is providing this notice?	Prospect Ridge
What we do	
How does Prospect Ridge protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Prospect Ridge collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>▪ Open an account</li> <li>▪ Give us your income information</li> <li>▪ Give us your contact information</li> <li>▪ Make deposits or withdrawals from your account</li> <li>▪ Fill out and return a Subscription Agreement</li> </ul>
Why can't I limit all sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>▪ affiliates from using your information to market to you</li> <li>▪ sharing for nonaffiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>▪ <i>Affiliates include those entities that are controlled by or are under common control with Prospect Ridge, such as other investment advisory entities, investment funds, intermediate holding companies and special purposes vehicles, and co-investment vehicles.</i></li> </ul>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>▪ <i>Prospect Ridge does not share with nonaffiliates so that they can market to you.</i></li> </ul>
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>▪ <i>Prospect Ridge does not jointly market.</i></li> </ul>
Other important information	
As described above, we may disclose information we collect from you in connection with our everyday business purposes. Examples of our everyday business purposes include but are not limited to: account opening with a broker or custodian, processing transactions, auditing purposes and responding to any regulatory authorities, court orders or legal investigations.	

## GDPR PRIVACY POLICY FOR INDIVIDUALS IN THE EUROPEAN ECONOMIC AREA AND UNITED KINGDOM

Investors that are residents of the European Economic Area (“EEA”) and the United Kingdom (“UK”) should note that by completing a subscription agreement for a fund or otherwise providing certain information in connection with an investment in a fund or an account advised or managed by Prospect Ridge LLC or its affiliates (collectively “Prospect Ridge”) (any such fund or account, a “Fund”) they may have provided personal information, which may constitute “personal data” within the meaning of the General Data Protection Regulation (Regulation (EU) 2016/679 (“GDPR”) and related implementing legislation in the EEA and UK, including (but not limited to) the UK’s Data Protection Act 2018 (“DPA”), (together, “Data Protection Legislation”).

The types of personal data that we may collect and process include:

- social security number;
- income;
- account balances;
- investment experience;
- transaction history;
- wire transfer instructions; and
- name, address and any other additional information disclosed to us in a Subscription Agreement.

Investors’ personal data will be used by the applicable Fund and Prospect Ridge for the following purposes:

- to manage and administer an investor’s holding in such Fund and any related accounts on an ongoing basis in accordance with the contract between the investor and such Fund or Prospect Ridge;
- to carry out statistical analysis and market research;
- to comply with legal and regulatory obligations applicable to the investor, such Fund and/or Prospect Ridge from time to time including applicable anti-money laundering and counter terrorist financing legislation;
- to comply with any tax regulations and requests from tax authorities;
- in connection with making and disposing investments including with respect to anti-money laundering and know-your-customer review; and
- to enable Prospect Ridge to determine whether other services or products may be suitable for a particular investor and to facilitate the subscription of such investor in other Funds.

In each case the personal data referred to above will only be used in connection with the Fund’s and Prospect Ridge’s legitimate business interests and accordingly investors’ specific consent is not required.

Investors’ personal data may be disclosed by the Fund and/or Prospect Ridge to their delegates, professional advisors, service providers, regulatory bodies, auditors, technology providers and any duly authorised agents or related, associated or affiliated companies of the foregoing for the same or related purposes.

Investors' personal data may be transferred to countries which may not have the same or equivalent data protection laws as that required under Data Protection Legislation. Any such transfer of personal data will be in compliance with Data Protection Legislation and appropriate measures are in place to ensure this such as entering into "Model Contractual Clauses" (as published by the European Commission). For more information on the means of transfer of investors' data or a copy of the relevant safeguards, please contact [investors@prospectridge.com](mailto:investors@prospectridge.com).

Pursuant to Data Protection Legislation, investors have the right to object to processing of personal data by the Fund and/or Prospect Ridge and a number of other rights which may be exercised in respect of their personal data in certain circumstances, *i.e.*:

- the right of access to personal data held by the Fund or Prospect Ridge;
- the right to amend and rectify any inaccuracies in personal data held by the Fund or Prospect Ridge;
- the right to erase personal data held by the Fund or Prospect Ridge;
- the right to data portability of personal data held by the Fund or Prospect Ridge; and
- the right to request restriction of the processing of personal data held by the Fund or Prospect Ridge.

These rights will be exercisable subject to limitations as provided for in Data Protection Legislation. Investors may make a request to the Fund or Prospect Ridge to exercise these rights by contacting [investors@prospectridge.com](mailto:investors@prospectridge.com).

Please note that personal data may be retained by the Fund or Prospect Ridge for the duration of an investor's investment and afterwards including, but not limited to, in connection with the Fund's or Prospect Ridge's legal, tax and regulatory obligations, as well as the Fund's and Prospect Ridge's record retention policies.

The Fund and Prospect Ridge are each a data controller within the meaning of Data Protection Legislation and undertake to hold any personal information provided by investors in confidence and in accordance with Data Protection Legislation. For queries, requests or comments in respect of this notice or the way in which the Fund or Prospect Ridge uses investors' personal data, please contact [investors@prospectridge.com](mailto:investors@prospectridge.com). Note that investors have the right to lodge a complaint with the appropriate regulator.