

INVESTOR PRIVACY POLICY

THIS INVESTOR PRIVACY POLICY COVERS ALL INDIVIDUALS WHO ARE INVESTORS IN THE VERITION FUNDS (THE “FUNDS”), WHO HAVE BEEN INVESTORS IN THE FUNDS OR WHO ARE CONSIDERING AN INVESTMENT IN THE FUNDS (“INVESTORS”) AND SUPPLEMENTS ANY ADDITIONAL PRIVACY POLICY PROVIDED TO INVESTORS.

VERITION FUND MANAGEMENT LLC (THE “MANAGER”) IS COMMITTED TO MAINTAINING THE PRIVACY OF INVESTORS. THE MANAGER RECOGNIZES THAT INVESTORS ENTRUST THE MANAGER WITH HIGHLY CONFIDENTIAL PERSONAL AND FINANCIAL INFORMATION, AND THE MANAGER UNDERSTANDS THAT PROTECTING AND SAFEGUARDING THIS INFORMATION IS IMPORTANT.

IN THE COURSE OF PROCESSING AN INVESTOR’S SUBSCRIPTION AGREEMENT TO THE FUNDS AND THE MANAGER’S ONGOING DEALINGS WITH SUCH INVESTOR, THE MANAGER MAY OBTAIN NON-PUBLIC PERSONAL INFORMATION ABOUT SUCH INVESTOR. THIS INFORMATION MAY INCLUDE THE INVESTOR’S NAME, ADDRESS, TELEPHONE NUMBER, EMAIL ADDRESS, PASSPORT NUMBER, SOCIAL SECURITY NUMBER, TAXPAYER IDENTIFICATION NUMBER, BANK ACCOUNT NUMBER, TRANSACTION HISTORY AND OTHER PERSONAL INFORMATION. THE MANAGER MAY COLLECT DIFFERENT TYPES OF INFORMATION IN A VARIETY OF WAYS, INCLUDING:

- INFORMATION IT RECEIVES FROM AN INVESTOR’S SUBSCRIPTION AGREEMENT, FROM OTHER FORMS AND QUESTIONNAIRES, OR OTHERWISE IN THE COURSE OF ESTABLISHING AN INVESTOR RELATIONSHIP.
- INFORMATION ABOUT THE FREQUENCY OF AN INVESTOR’S OR OTHER PERSON’S USE OF THE MANAGER’S WEB SITE.
- INFORMATION ABOUT AN INVESTOR’S TRANSACTIONS WITH THE FUNDS, ITS AFFILIATES OR OTHERS, SUCH AS SUCH INVESTOR’S INVESTMENT AND WITHDRAWAL HISTORY.

THE MANAGER USES THIS INFORMATION FOR MARKETING PURPOSES AS WELL AS INTERNAL ADMINISTRATION AND ANALYSIS. THE MANAGER DOES NOT DISCLOSE ANY NON-PUBLIC PERSONAL INFORMATION ABOUT INVESTORS TO ANY NON-AFFILIATED PARTIES, EXCEPT TO THIRDPARTY SERVICE PROVIDERS WHO ASSIST IN THE OPERATION OF THE MANAGER’S AND THE FUNDS’ BUSINESS, AS REQUIRED BY LAW, AT THE INVESTORS’ REQUEST OR WITH THEIR CONSENT. THE MANAGER RESTRICTS ACCESS TO NON-PUBLIC PERSONAL INFORMATION TO THOSE PERSONNEL, AGENTS OR OTHER PARTIES WHO NEED TO KNOW THAT INFORMATION TO PROVIDE SERVICES TO SUCH PERSONS. THE MANAGER MAINTAINS PHYSICAL, ELECTRONIC AND PROCEDURAL SAFEGUARDS TO PROTECT NON-PUBLIC PERSONAL INFORMATION.

FOR THE LIMITED PURPOSES OUTLINED ABOVE, THE MANAGER MAY DISSEMINATE INTERNALLY NON-PUBLIC, PERSONAL INFORMATION CONCERNING INVESTORS. HOWEVER, THE MANAGER WILL USE REASONABLE BEST EFFORTS TO ENSURE THAT SUCH INFORMATION IS TREATED IN ACCORDANCE WITH THIS PRIVACY POLICY.

BY DISCLOSING PERSONAL INFORMATION TO THE MANAGER, THE DISCLOSING PARTY CONSENTS TO THE COLLECTION, STORAGE AND PROCESSING OF ITS PERSONAL INFORMATION BY THE MANAGER IN A MANNER CONSISTENT WITH THIS PRIVACY POLICY.

THE MANAGER WILL PROVIDE INVESTORS WITH A COPY OF ITS PRIVACY POLICY ANNUALLY, AND IF ANY MATERIAL CHANGES OCCUR TO ITS PRIVACY POLICY, THE MANAGER WILL NOTIFY INVESTORS AS PROMPTLY AS PRACTICABLE OF SUCH CHANGES. IF YOU HAVE ANY QUESTIONS ABOUT THIS PRIVACY POLICY, PLEASE CALL A REPRESENTATIVE OF THE MANAGER AT +1 (203) 742-7700.

ALTHOUGH REGULATIONS ONLY REQUIRE THAT THE FOREGOING PRIVACY POLICY BE APPLIED TO NATURAL PERSONS, THE MANAGER APPLIES THE SAME PRIVACY POLICY TO ALL INVESTORS.

THE FOREGOING PRIVACY POLICY SHALL NOT PREVENT THE MANAGER OR THE FUNDS FROM DISCLOSING TO APPROPRIATE THIRD PARTIES SUCH INFORMATION AS THE MANAGER OR THE FUNDS MAY DEEM NECESSARY OR ADVISABLE IN ORDER TO COMPLY WITH APPLICABLE ANTI-MONEY LAUNDERING AND OTHER APPLICABLE LAWS AND REGULATIONS.