

Global Privacy Notice

i. Purpose of this Notice

This Global Privacy Notice describes the policies and procedures followed by Verition Fund Management LLC and its subsidiaries, including Verition Advisors (Singapore) Pte. Ltd., Verition Management (DIFC) Limited and Verition Advisors (UK Partners) LLP (“Verition”, “we”, “our”, “us”) regarding the collection, use and disclosure of your personal information when you visit our website or otherwise interact with Verition.

For purposes of relevant data protection laws, Verition is the data controller of your personal information. This notice must be read in conjunction with our Website Terms of Use and is incorporated into our Terms of Use.

We reserve the right to update this privacy notice when required. We may also notify you in other ways from time to time about the processing of your personal data.

If you are an investor in any of the Verition funds (the “Funds”), your privacy rights are also described in the Investor Privacy Policy.

We do not collect or maintain information through our website from those whom we actually know are under the age of 18 and no part of our website is targeted to attract anyone under 18.

ii. What information is being collected and why

If you visit the website, receive services from us or otherwise interact with us, we may collect and process the following data about you:

- Information that you give to us, such as your name, company name and contact details. If you are an investor or a prospective investor, we may also collect your passport information, social security number, asset details, account balances, transaction history and bank details.
- Information that we collect about you. We may automatically collect basic technical information from all visitors to the website through our automatic data collection tools which may include cookies (see section on Cookies below).
- Information that we receive from other sources, such as social media, analytics providers and search information providers.
- Information may also be collected about you indirectly from monitoring or other means, such as recording of telephone calls and monitoring of emails to/from us, for legal, compliance or security purposes.

iii. Use of your information

We may use the personal information you give us for the following purposes:

Purpose	Lawful Basis
To respond to your requests, enquiries and other communications	We have a legitimate interest in communications for ongoing business administration
For recruitment purposes	We have a legitimate interest in considering applicants in accordance with our recruitment process
To personalize your visit to the website and to assist you while you use the website	We have a legitimate interest in the proper management and administration of our relationship with you and to ensure that we are as effective and efficient as we can be

To improve the website by helping us understand who uses the website	We have a legitimate interest in the proper management and administration of our relationship with you and to ensure that we are as effective and efficient as we can be
For fraud prevention and detection and to comply with applicable laws, regulations, or codes of practice including complying with any obligations derived from anti-money laundering and counter-terrorism legislation	To comply with our legal obligations and our legitimate interests

You have the right to object to the processing of your personal information where the lawful basis is our legitimate interest. An objection will be deemed justified unless compelling grounds for such processing override your interests as a Data Subject. As such, the right to object is not absolute.

iv. Sharing your information

Access to personal data will be given to Verition staff where necessary. This may include investor relations personnel, information technology personnel, human resources personnel, relevant business managers, and authorized representatives of internal control functions, such as Audit and Compliance. We may use selected third parties to provide us with technical support for the website or other services who may have access to your personal information. Third party processors may include tax authorities, regulators, external auditors, lawyers, IT managed service providers, fund administrators, custodians, background and sanction check service providers.

Sharing personal data with Verition staff and third parties may involve cross-border transfers including transfers outside of the UK/EEA.

v. How data is stored

Security. Verition maintains physical, electronic, and procedural safeguards reasonably designed to protect your information against loss, misuse, damage, or modification and unauthorized access or disclosure. Verition can make no guarantee that these procedures will prevent all unauthorized access and, as a result, personal information submitted through or contained on the website may be vulnerable to unauthorized disclosure to unknown third parties.

Data Quality, Storage, and Access. While we endeavor to ensure that all information we hold about you is accurate, complete and up to date, you can help us in this regard by promptly notifying us if there are any changes to your personal information.

Retention. Notwithstanding anything herein to the contrary, Verition may retain your personal information as necessary for the provision of services, for internal analytical purposes, or to comply with its legal obligations, resolve disputes and enforce agreements. The criteria used to determine the retention periods include: (i) how long the personal data is needed to provide the services and operate the business; (ii) the type of personal data collected; and (iii) whether we are subject to a legal, contractual or similar obligation to retain the data (e.g. mandatory data retention laws, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation or disputes).

Cookies. The website may use “cookies” which may automatically collect certain information and data. Cookies are small pieces of data sent to your computer browser from our web server and stored on your computer’s hard drive. The data identifies you as a unique user and facilitates your ongoing access to and use of the website. Cookies may also help us diagnose problems with our server and the website. If you do not want us to use cookies when you use the website, you can

adjust your internet browser settings to not accept cookies. Your web browser's help function should tell you how to do this. The cookies currently used are listed below but may be updated from time to time:

CD_activated – tracks that the user has set preferences on the cookie disclaimer tool

CD_consent{x} – tracks that the user has consented to option {x} for cookie

vi. [Your rights and how to exercise them](#)

Under certain circumstances, under the GDPR you have the right to: (i) request access to and rectification and erasure of your personal information; (ii) obtain restriction of processing or to object to processing of your personal information; and (iii) ask for a copy of your personal information be provided to you, or a third-party in a digital format. You also have the right to lodge a complaint about the processing of your personal information with your local data protection authority. Such rights are subject to applicable exemptions and restrictions under applicable laws.

You can contact us to exercise your rights by emailing the Data Protection Team at dataprivacy@veritionfund.com.