



The California Consumer Privacy Act

The California Consumer Privacy Act (with any implementing regulations and as may be amended from time to time, “CCPA”) imposes certain obligations on Kirkoswald Capital Partners LLP, Kirkoswald Asset Management LLC (together, “Kirkoswald”) and the collective investment schemes, pooled investment vehicles and/or separately managed accounts managed by Kirkoswald (together, “we” or “us”) and grants certain rights to California resident investors (“California Resident,” “you,” or “your”) with regard to “personal information.” If you are a California Resident, please review the following information about our privacy practices surrounding how and why we collect, use, disclose and share personal information, our notice at collection, and a description of your potential rights under the CCPA. The rights described herein are subject to exemptions and other limitations under applicable law.

Terms used herein have the meaning ascribed to them in the CCPA. We are a “business.”

Notice at Collection and Use of Personal Information

Information We Collect

Depending on how you interact with us, we may collect the following categories of personal information from or about you: (i) identifiers and similar information such as, name, address, date of birth, email address, social security number, driver’s license number, or passport number, online identifiers or other similar identifiers; (ii) additional information protected under state law, including California Civil Code Section 1798.80(e), such as a signature, credit card information, bank account or other financial information; (iii) characteristics of protected classifications under certain federal or state laws, including gender, age, national origin, citizenship or marital status; (iv) commercial information, including records of products or services purchased, obtained or considered, or other purchasing histories or tendencies, including funds invested, investments considered, or sources of wealth; (v) internet or other electronic network activity information, including interactions with our website or use of certain online tools; (vi) professional or employment-related information, including occupation, compensation, employer, and title; (vii) audio, electronic, or visual information such as call recordings; and (viii) inferences drawn from any of the information identified above to create a profile reflecting your preferences or similar information, including your potential interest in investing in new funds or products.

How We Use Collected Information

We may use your personal information for the following business or commercial purposes: (i) performing services on our behalf, including maintaining or servicing accounts, providing investor relations services, processing subscriptions, and redemptions, verifying information, processing payments, or providing similar services; (ii) performing our contractual obligations to a California Resident, including processing initial subscriptions and providing updates on a fund’s performance, providing tax reporting and other operational matters; (iii) detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, including



preventing fraud and conducting “Know Your Client,” anti-money laundering, anti-terrorist financing, and conflict checks; and (iv) enabling or effecting commercial transactions, including using bank account details to remit funds and process distributions.

For more information about our privacy practices, please review our Privacy Policy [here](#).

Our Collection, Use, Disclosure and Sharing of Personal Information

Information We Have Collected

In the preceding 12 months, and depending on how you interact with us, we may have collected the categories of personal information listed above in the “Information We Collect” section.

Sources of Personal Information

We may collect personal information about you directly from you and/or your intermediaries through sources such as: (i) account applications, subscription agreements, and other forms or related documentation; (ii) written, electronic, or verbal correspondence with us or our service providers; (iii) investor transactions; (iv) an investor’s brokerage or financial advisory firm, financial advisor, or consultant; and/or (v) from information captured on applicable websites. In addition, we may collect personal information from different sources, such as: (i) our affiliates, our service providers, or our affiliates’ service providers; (ii) public websites or other publicly accessible directories and sources, including bankruptcy registers, tax authorities, governmental agencies and departments, and regulatory authorities; and/or (iii) from credit reporting agencies, sanctions screening databases, or from sources designed to detect and prevent fraud.

Purposes for Collecting Personal Information.

We may collect your personal information for the business or commercial purposes described above in the “How We Use Collected Information” section.

Disclosure and Sharing Personal Information with Third Parties

We do not sell your personal information. We may disclose personal information to third parties in circumstances where we believe in good faith that disclosure is required or permitted under law, to cooperate with regulators or law enforcement authorities, to protect our rights or property, or upon reasonable request by the fund in which you have invested. We also may disclose personal information about you or your accounts to a third party at your request or direction or with your consent.

In the preceding 12 months, we may have disclosed for a business purpose each of the categories of personal information listed above in, “Information We Collect,” to the following categories of third parties: (i) counterparties, intermediaries and third-party board members in connection with investments and transactions or for operational purposes; (ii) entities who assist with fraud prevention, detection and mitigation, including credit agencies and to assist with anti-money



laundering or anti-terrorism checks; (iii) third parties as needed to complete a transaction, including financial institutions or lenders to or creditors of a fund; (iv) marketing, advertising or analytics partners; (v) judicial courts, regulators, or other government agents purporting to have jurisdiction over us or our affiliates or opposing counsel and parties to litigation; (vi) any relevant third-party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets; and (vii) other third parties as may otherwise be permitted by law.

We may also disclose your personal information to our affiliates and our service providers, including our information technology providers, archiving service providers, client relationship management software provider, fund administrator, email providers, professional services organizations and other entities that have agreed to limitations on the use of your personal information or that fit within other exemptions or exceptions in or as otherwise permitted by the CCPA or other applicable laws.

California Residents' Rights Under the CCPA

If your personal information is subject to the CCPA, you may have certain rights concerning that information, subject to applicable exemptions and limitations, including the right to: (i) be informed, at or before the point of collection, of the categories of personal information to be collected and the purposes for which the categories of personal information shall be used; (ii) request that we delete any personal information about you that we have collected, subject to certain exemptions or exceptions ("Request to Delete"); (iii) request that we, as a business that collects personal information about you and that discloses your personal information for a business purpose, disclose to you ("Request to Know"): (a) the categories of personal information we have collected about you; (b) the categories of sources from which we have collected the personal information; (c) the business or commercial purpose for collecting the personal information; (d) the categories of third parties to whom we disclosed personal information for a business purpose; (e) the specific pieces of personal information we have collected about you; and (f) the categories of personal information we have disclosed about you for a business purpose; (iv) opt-out of the "sale" (as that term is defined in the CCPA) of your personal information if a business sells your personal information (we do not); and (v) not be discriminated against because you exercised any of your rights under the CCPA.

The CCPA does not restrict our ability to do certain things like comply with other laws or comply with regulatory investigations. In addition, the CCPA does not apply to certain information, including, generally, personal information collected, processed, sold or disclosed pursuant to the Gramm-Leach-Bliley Act and its implementing regulations. Notwithstanding the foregoing, we reserve the right to retain, and not to delete, certain personal information after receipt of a Request to Delete from you where permitted by the CCPA or where another law or regulation is applicable. We may retain your personal information if doing so is necessary for us or our service providers to, for example: (a) comply with a legal obligation; (b) enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us; (c) complete a transaction for which we collect the personal information, provide a good or service requested by you, or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between you and us; and (d) use your personal information,



internally, in a lawful manner that is compatible with the context in which you provided the information.

How to Submit a Request Under the CCPA

You may submit a Request to Know by contacting us via phone at +1-332-207-4650 or through our website at the following link <http://kirkoswald.com> by clicking on “Contact Us” and sending an email. Please state in the subject line “Request to Know.” You may submit a Request to Delete by sending such request to Kirkoswald Asset Management LLC, 520 Madison Avenue, Floor 25, New York, NY 10022 or through our website at the following link <http://kirkoswald.com> by clicking on “Contact Us” and sending an email. Please state in the subject line “Request to Delete.”

We are required to provide certain information or to delete personal information only in response to verifiable requests made by you or your authorized agent. When you submit a Request to Know or Request to Delete, we may ask that you provide clarifying or identifying information to verify your request. Such information may include, at a minimum, depending on the sensitivity of the information you are requesting and the type of request you are making, your name, phone number and email address, and we may require you to discuss the request with us over the phone. This measure is in place to help ensure that personal information is not disclosed to any person who does not have the right to receive it. Any information gathered as part of the verification process will be used for verification purposes only.

You are permitted to designate an authorized agent to submit a Request to Know or a Request to Delete on your behalf and have that authorized agent submit the request through the aforementioned methods. In order to be able to act, authorized agents have to submit written proof that they are authorized to act on your behalf, or have a power of attorney. We may deny requests from authorized agents who do not submit proof that they have been authorized by you to act on your behalf. We may also require that you directly verify your own identity with us and directly confirm with us that you provided the authorized agent permission to submit the request.

We will deliver responses to verifiable consumer requests, free of charge, either through your online account with one of our service providers, if you have such an account already, or, if you do not have a pre-existing online account, by mail or electronically, at your election.

We will try to respond to your Requests to Know or Request to Delete within forty-five (45) days of receipt of the request. If we require more time, we will try to inform you of our need for an extension. Even with an extension, we will try to provide a response within ninety (90) days of initial receipt of the request.

Please note that we are not required to provide information in response to Requests to Know more than twice in a 12-month period. Any response to a Request to Know will only cover the 12-month period preceding the verifiable request.



Contact for More Information

If you have any questions or concerns about this notice please contact us at +1-332-207-4650.

This California-specific privacy policy was last updated on January 14, 2022.