



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 the Manager, the Co-Investment Managers and Kirkoswald Global Macro Fund LP (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, and disclose 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 certain categories of personal information from or about you including: (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 subject to California Civil Code Section 1798.80(e), such as a signature, account balances, wire instructions, 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) 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; and (viii) sensitive personal information under the CCPA such as your social security number, passport number, driver’s license or state identification card.

How We Use Collected Information

We may use your personal information for business or commercial purposes, including: (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.

How Long We Keep Information

How long we keep your personal information will vary depending on the type of personal information and our reasons for collecting it. The retention period will be determined by various criteria, including the purposes for which we are using it (as it will need to be kept for as long as is necessary for any of those purposes) and our legal obligations (as laws or regulations may set a minimum period for which we have to keep your personal information). In general, we will retain your personal information for as long as we require it to perform our contractual rights and obligations or for periods required by our legal and regulatory obligations.

Sale or Sharing of Personal Information

We do not sell or share your personal information (as such terms are defined under the CCPA).

For more information about our privacy practices, please review our privacy policy at the top of this document.

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 of Personal Information

We do not sell your personal information (as those terms are defined under the CCPA). We do not knowingly sell or share the personal information of California residents under 16 years old. In the preceding 12 months, we may have disclosed the categories of personal information identified in (i), (ii), (iii), (iv), (vi) and (viii) in the “Information We Collect” section to (i) fund administrators (ii) professional services organizations such as legal counsel and (iii) client relationship management software providers.

In the preceding 12 months, we may have also 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) judicial courts, regulators, or other government agents purporting to have jurisdiction over us or our affiliates or opposing counsel and parties to litigation; (ii) 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 (iii) other third parties as may otherwise be permitted by law. We may also disclose for a business purpose such personal information upon reasonable request by the fund in which you have invested or at your request or direction or with your consent. In addition, we may disclose personal information to the third parties listed above to comply with our legal obligations or for the purposes identified above in “How We Use Collected Information” section.

We may also disclose your personal information to our affiliates and our service providers, including our money laundering reporting officer, information technology providers, archiving service providers, auditor, 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.

Use and Disclosure of Sensitive Personal Information

As noted above in “Personal Information We Collect”, under the CCPA, certain personal information we collect and process may be considered “sensitive personal information.” The CCPA requires that we provide you with a right to limit our use or disclosure of such sensitive personal information in certain circumstances. Currently, we are not using your sensitive personal information for purposes that would require that we provide you with a right to limit.

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 from you, subject to certain exemptions or exceptions (“Request to Delete”); (iii) opt-out of the “sharing” (as that term is defined in the CCPA) of your personal information if a business shares your personal information with third parties (we do not); (iv) limit the use and disclosure of sensitive personal



information where required by the CCPA (“right to limit”) (please note that we are not using your sensitive personal information for purposes that would require that we provide you with a right to limit); (v) correct inaccurate personal information (“Request to Correct”) that a business maintains about a consumer; (vi) request that we, as a business that collects personal information about you and that discloses your personal information, inform you of (“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 about you; (e) the specific pieces of personal information we have collected about you; and (f) the categories of personal information we have disclosed about you; (vii) 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 (viii) 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.

How to Submit a Request Under the CCPA

You may submit a Request to Know, Request to Delete or Request to Correct by contacting us via phone at +1-888-547-5679 or +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, Request to Delete or Request to Correct, where applicable.”

We are required to provide certain information, to delete personal information or to correct inaccurate personal information only in response to verifiable requests made by you or your authorized agent. When you submit a Request to Know, Request to Delete or Request to Correct, 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, Request to Delete, or Request to Correct 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.

Contact for More Information

If you have any questions or concerns about this notice or if you wish to obtain such policy in alternative formats, please contact us at +1-888-547-5679 or +1-332-207-4650.

This California-specific privacy policy was last updated on March 20, 2023. A copy of the general privacy policy can be found at www.kirkoswald.com.