

**OCEANIQ
CAPITAL,
LLC**

PRIVACY NOTICE REGARDING CLIENT PRIVACY

Maintaining the trust and confidence of our clients is a high priority. That is why we want you to understand how we protect your privacy when we collect and use information about you, and the steps that we take to safeguard that information. This notice is provided to you on behalf of OceanIQ Capital, LLC (referred to as “OceanIQ”, “we”, “us” or “our” in this Privacy Notice).

This privacy notice aims to provide information on how OceanIQ processes individual’s and client’s Nonpublic Personal Information. Nonpublic Personal Information can be collected through various forms: email, through the Firm’s website, subscription documents, business correspondence, over the phone, etc. United States Federal law provides consumers the right to limit some, but not all sharing and requires OceanIQ to inform you how we collect, share, and protect your personal information. In addition, this privacy notice reflects OceanIQ’s adherence to the requirements of the U.S. Privacy Act of 1974, Regulation S-P, the EU’s General Data Protection Regulation, the UK’s Data Protection Act 2018, and the California Consumer Privacy Act (collectively referred to herein as the “Privacy Rules”).

It is important that you read this Privacy Notice together with any other privacy notice or documentation that we may provide so that you are fully aware of how and why we are using your data. This Privacy Notice supplements those other notices and is not intended to override them.

We do not knowingly collect data relating to anyone under the age of 16.

Who We Are and How You Can Contact Us: OceanIQ Capital, LLC, 275 Shoreline Dr, Suite 120, Redwood Shores, CA 94065, is an investment management firm that offers its services to clients worldwide.

Information We Collect: In connection with providing investment products, investment advice, or other services, we obtain Nonpublic Personal Information about you, including but not limited to:

- Information we receive from you on account applications or subscription documents, such as your address, date of birth, Social Security Number, occupation, financial goals, assets and income; and
- Information about your transactions with us, our affiliates, or others.

Sale of Nonpublic Personal Information: We do not sell your Nonpublic Personal Information to any third-party service provider. All Nonpublic Personal Information is utilized by OceanIQ in the conduct of our business relationship with our clients. OceanIQ does not sell customer lists and will not sell your name to telemarketers.

Categories of Information We Disclose: We may only disclose information that we collect in accordance with our privacy policy.

Categories of Parties to Whom We Disclose: We will not disclose information regarding you or your account at OceanIQ, except under the following circumstances:

- To entities that perform services for us or function on our behalf, including financial service providers, such as broker-dealers, consultants, administrators and other service providers with whom we are contracted;
- To your attorney, trustee or anyone else who represents you in a fiduciary capacity;
- To our attorneys, accountants or auditors; and
- To government entities, SROs or other third parties in response to subpoenas or other legal processes as required by law or to comply with regulatory inquiries.

How We Use Information: We will only use your Nonpublic Personal Information when the law allows us to. Your Nonpublic Personal Information may be used among us, our affiliates, and those third party companies that perform support services for us (such as IT service providers, fund administrators, consultants, client relationship management technology, and other companies that help us provide services to you) for a number of purposes, such as:

- **To provide investment management services;**
- **To protect your accounts/Nonpublic Personal Information** from unauthorized access or identity theft;
- **To process your requests;**
- **To conduct AML/KYC functions;**
- **To administer and protect** our business and our website;
- **To establish or maintain an account with an unaffiliated third party**, such as a fund administrator, broker-dealer providing services to you and/or OceanIQ;
- **To service your accounts;**
- **To comply** with Federal, State, and Self-Regulatory Organization requirements;
- **To keep you informed** of market events, macroeconomic matters and other areas of interest expressed by you.

Data Security: We have put in place appropriate security measures to prevent your Nonpublic Personal Information from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your Nonpublic Personal Information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Nonpublic Personal Information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Nonpublic Personal Information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Third-Party Links: It is important you understand that the OceanIQ website may include links to third-party websites, blogs, social media platforms and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

Your Legal Rights: Under certain circumstances, you have rights under data protection laws in relations to your Nonpublic Personal Information.

Particularly, as a non-US client or investor, you have the right to:

- **Request access** to your Nonpublic Personal Information (commonly known as a “data subject access request”). This enables you to receive a copy of the Nonpublic Personal Information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the Nonpublic Personal Information that we hold about you (if it is incorrect or incomplete). This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. Please keep us also informed if your Nonpublic Personal Information changes during your relationship with us.
- **Request erasure** of your Nonpublic Personal Information. This enables you to ask us to delete or remove Nonpublic Personal Information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Nonpublic Personal Information where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Nonpublic Personal Information to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- **Request restriction of processing** of your Nonpublic Personal Information. This enables you to ask us to suspend the processing of your Nonpublic Personal Information in the following scenarios: (a) if it is not accurate; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- **Request the provision** of your Nonpublic Personal Information to you or to a third party. We will provide to you, or a third party you have chosen, your Nonpublic Personal Information in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent at any time** where we are relying on consent to process your Nonpublic Personal Information. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, or if you want further information on the controls in place to ensure the protection of your information when transferring Nonpublic Personal Information, please contact us at compliance@oceaniccapital.com.

You will not have to pay a fee to access your Nonpublic Personal Information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Nonpublic Personal Information (or to exercise any of your other rights). This is a security measure to ensure that Nonpublic Personal Information is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Closed Accounts or Withdrawal: If you decide to close your account(s) or withdraw from one of our pooled investment vehicles, our Privacy Policy will continue to apply to you.

Complaint Notification: Please direct complaints to: Kai Chen, Founder, Managing Director & Chief Compliance Officer at OceanIQ Capital, LLC, at compliance@oceaniqcapital.com.

Opt-out Notification: If you wish to opt-out of OceanIQ's use and storage of your information, please send an email to compliance@oceaniqcapital.com. As a note, certain information may be required to be retained for legal and regulatory purposes.

Jurisdictional Specific Requirements:

Regulation S-AM: Under Regulation S-AM, a registered investment adviser is prohibited from using eligibility information that it receives from an affiliate to make a marketing solicitation unless: (1) the potential marketing use of that information has been clearly, conspicuously and concisely disclosed to the consumer; (2) the consumer has been provided a reasonable opportunity and a simple method to opt out of receiving the marketing solicitations; and (3) the consumer has not opted out. OceanIQ does not receive information regarding marketing eligibility from affiliates to make solicitations.

Cayman Islands Data Protection Law: We may act as a Controller of Nonpublic Personal Information and as a Processor of Nonpublic Personal Information in the following scenarios:

- In the context of the business activities of OceanIQ;
- For the provision or offer of services to individuals; and
- In the context of human resources where OceanIQ has Nonpublic Personal Information of its employees.

We have appointed a Data Protection Contact who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the Data Protection Contact at compliance@oceaniqcapital.com.

California Consumer Privacy Act: The CCPA applies to all for-profit entities which do business in California, collect personal information of consumers, have annual gross

revenues in excess of \$25mm, and derive 50% or more of its annual revenues from selling consumer's personal information. Although OceanIQ does not currently sell consumer information, if you wish to ensure that your Nonpublic Personal Information is not sold by OceanIQ (which is currently not an OceanIQ practice), please send an email to compliance@oceaniqcapital.com.

European Union GDPR: In compliance with GDPR, we have appointed a Data Protection Compliance Manager (DPCM) who is responsible for overseeing questions in relation to this Privacy Notice. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, please contact the DPCM at compliance@oceaniqcapital.com. It is important to note that if you are a user located in the European Union or in the European Economic Area, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), or your local EU/EEA data protection supervisory authority. We would, however, appreciate the chance to deal with your concerns before you approach the ICO or other authorities so please contact us in the first instance.

United Kingdom: If you are a user located in the United Kingdom, you have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk), or while the UK is still part of the EU/EEA, with your local EU/EEA data protection supervisory authority. We would, however, appreciate the chance to deal with your concerns before you approach the ICO or other authorities so please contact us in the first instance.

Changes to This Privacy Policy: If we make any substantial changes in the way we use or disseminate Nonpublic Personal Information, we will notify you. If you have any questions concerning this Privacy Policy, please contact Kai Chen, Founder, Managing Director & Chief Compliance Officer at OceanIQ Capital, LLC, at compliance@oceaniqcapital.com.