

FACTS

WHAT DOES AFFINIUS CAPITAL DO WITH YOUR PERSONAL INFORMATION?

Why?

Financial companies choose how they share non-public personal information of investors and former investors, and federal law gives investors the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your non-public personal information. Please read this notice carefully to understand what we do.

What?

We collect personal information to operate our business. This information can include:

- Information we receive from you on subscription agreements, investor questionnaires, contracts, or other documents, such as:
 - Name, address, telephone number, email and physical address, and date of birth
 - Government-issued identification (including social security number)
 - Bank account and other account information
 - Information about your transactions with us, our affiliates, or others, such as participation in other investment programs, ownership of certain types of accounts or other account data and activity
- Information we receive from consumer reporting agencies, credit bureaus, and background screening providers
- Information we receive in meetings, telephone conversations and other interactions with you

When you are no longer our customer, we continue to share your information as described in this notice.

How?

All financial companies need to share investors' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their investors' personal information; the reasons Affinius Capital LLC and its subsidiaries ("Affinius Capital") chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Affinius Capital share?	Can you limit this sharing?
For our everyday business purposes— such as to process your investments or dispositions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For investment purposes— such as to actual or potential partners, investors or co-investors and their respective advisors	Yes	No
For marketing and client service purposes— to offer our products and services and provide client services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes— information about your transactions and creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We don't share

Who we are

Who is providing this notice?

Affinius Capital Advisors LLC ("Affinius Capital Advisors") and Affinius Capital Management LLC ("Affinius Capital Management"). Affinius Capital Advisors and Affinius Capital Management are subsidiaries of Affinius Capital.

What we do

How does Affinius Capital protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

Federal law gives you the right to limit only:

Why can't I limit all sharing?

- Sharing information about your creditworthiness
- Affiliates from using your information to market to you
- Sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Information Requests

You have the right to request that we disclose to you or delete certain information about our collection and use of your non-public personal information. Once we receive your request and verify your identity, we will disclose such information to you or delete the information, unless a legal exception applies.

For example, we may deny your deletion request if retaining the information is necessary for us or our providers to provide a service you requested or otherwise perform our agreement with you. To submit a request to delete your non-public personal information, please e-mail us at compliance@affiniuscapital.com.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies. Affiliates of Affinius Capital Advisors and Affinius Capital Management include:

- Affinius Capital Europe B.V.
- Mountpark Realco Cooperatief NL UA
- Crimson Interests, LLC and its subsidiaries, including Patrinely Group, LLC

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

Affinius Capital does not share non-public personal information with nonaffiliates in order for them to market to you.

For California Residents Only

In addition to our Privacy Policy, the below notice is provided solely to certain **California residents** who are clients of Affinius Capital. To the extent that the California Consumer Privacy Act (“CCPA”), as amended by California Privacy Rights Act (“CPRA”) applies, you have the right to know what personal information we intend to collect or have collected about you and why. For clients of Affinius Capital, this information is provided in our **Privacy Notice**, above.

The CCPA also provides you the right to request access to specific pieces of information we have collected from you. You have the right to request correction of inaccurate information that we maintain about you. You

can also request that we delete personal information about you. You can contact our Compliance Department at 800-531-8182 or email compliance@affiniuscapital.com if you wish to make any of these requests. It is important to note, however, that the CCPA does not apply to all businesses, nor does it apply to personal information maintained by financial services firms that is covered under certain exemptions described in the CCPA, and as such, the CCPA will typically not apply to Affinius Capital's customers.

If we do not delete certain types of personal information because we have a legal right or obligation to retain that information, we will notify you of that. Further, if we do not delete certain items of personal information because we have a legal right or obligations to retain that data, we will delete that information at such later time that we no longer have a legal right or obligation to retain that information upon such request.

At this time, we do not sell personal data of share personal data for purposes of cross-context advertising. We are not required under CCPA to provide information to you about our collection of your personal information or our sale or disclosure of personal information about you more than twice within a 12-month period. Additionally, we are permitted to refuse to honor unfounded or excessive repetitive request to us or charge a reasonable administrative fee for honoring those requests, and in either case, will notify you of any such decision. We will not discriminate against you for making a rights request under California law. You have the right to appeal any decision regarding your rights and can do that by contacting us as described above.