

Townsend Group Privacy Policy

Last Updated: 04/22/2025

Townsend Group (“Townsend”) respects your concerns about privacy and treats data privacy as a primary concern. This Privacy Policy describes the types of personal information we collect, how we use the information, with whom we may share it regarding our use of the information. We also describe measures we take to protect the security of the information and how you can contact us about our privacy practices.

Townsend maintains reasonable physical, electronic and procedural safeguards to guard personal information we obtain. Townsend agrees to handle information to abide by confidentiality obligations and use personal information only in accordance with the purpose for which it is shared.

Confidentiality of Information

Townsend collects personal information from the following sources: (i) information it receives from individuals on subscription documents, investment management agreements, and know your customer forms or other forms including contact information; (ii) information about transactions with Townsend, its affiliates, or others; and (iii) information collected from due diligence procedures.

Townsend is a data controller within the meaning the General Data Protection Regulation (“GDPR”), the Swiss Federal Act on Data Protection (“FADP”) and other applicable data protection legislation in force in the European Economic Area (“EEA”), and a business within the meaning of the California Consumer Privacy Act of 2018 (“CCPA”) and undertakes to hold any personal information provided in accordance with EEA data protection legislation, the CCPA, or any other applicable privacy law.

Information We Obtain

The types of personal information we obtain include:

- Contact information, such as name, email, postal address, and phone number;
- Business-related information, such as the name of your employer or the organization you represent and your position;
- Demographic information, such as date and country of birth, nationality, and citizenship;
- Government-issued identification numbers provided in connection with a subscription to funds, such as Social Security/Insurance number, driver’s license number, passport number, national identification number, and tax identification number;
- Professional or employment-related information;
- Details regarding investor status (e.g., accredited investor or qualified purchaser), investment experience, expertise and strategy, and risk tolerance;
- Financial information, such as information related to your transactions with us or others, bank account details (e.g., account and routing number), financial account history, information concerning the source of funds used for investments, and details regarding your

investment history (e.g., types and amounts of investments) assets, income, and financial returns and positions;

- Information in connection with background checks, such as any information related to applicable restrictions on your investments (e.g., political exposure);
- Other information provided in subscription agreements, related eligibility questionnaires and documentation provided in connection with your subscription to funds (e.g., “know-your-customer” documentation or U.S. tax forms);
- Information you provide in the course of applying for a job with us, such as details about your education, work and military history, legal work eligibility status, and background check information;
- Information collected in connection with visits to our offices;
- Social media information;
- Other information you choose to provide, such as through investor relations communications.

Personal information that you provide directly to us will be apparent from the context in which you provide it, for example, if you (1) login to and/or register for our client portal; (2) enter into a contract (e.g., a subscription or investment advisory agreement) with us; (3) otherwise engage in correspondence with us.

We also may obtain personal information about you from third-party sources, including (1) the organization you represent (e.g., if you are a representative of an institutional investor); (2) publicly available sources; (3) governmental authorities (e.g., tax authorities); (4) transaction counterparties; and (5) social media networks.

Use of Your Personal Information

We process your personal information as necessary to perform our contractual relationship with you, including to:

- Communicate with you, respond to inquiries, and offer customer support in connection with our products and services;
- To provide the services you request;
- Establish, manage and administer investment accounts and subscriptions;
- Process and fulfill transactions;
- Facilitate and administer the transfer of funds;
- Evaluate, process and fulfill potential or actual investments or other transactions;
- Prepare investor disclosure materials;
- Assist our transaction counterparties with their legal obligations and due diligence;

- To comply with legal and regulatory obligations applicable to the investor, its managed or advised funds, separately managed accounts, advisory engagements or any related business relationship with the investor from time to time, including applicable anti-money laundering and counter terrorist financing legislation, investor qualification legislation and tax legislation.
- Inform you about, and advertise and market, our products and services;
- Exercise our rights and remedies and defend against legal claims;

We only use personal information in connection with Townsend's legitimate business interests and accordingly investors' specific consent is not required.

How We Share the Information We Obtain

Townsend does not sell, share, or market an investor's personal information to nonaffiliated third parties. Townsend's intent is to respect the investors' expectations that their personal information will be kept confidential. We may share your personal information with our professional advisors (e.g., auditors, accountants, law firms, and other consultants) and third-party service providers who perform services on our behalf (e.g., data analytics, IT storage and support, marketing, security, and fraud prevention). We do not authorize our service providers to retain, use, or disclose the personal information except as necessary to perform services on our behalf or comply with legal requirements.

We (and our third-party service providers, including affiliates) also may disclose personal information (1) if we are required or permitted to do so by law or legal process (such as a court order, subpoena or other legally valid inquiry or order), which may include lawful access by U.S. or foreign courts, law enforcement or other government authorities; (2) in response to requests by government agencies, such as law enforcement authorities; (3) to another organization for the purpose of investigating a breach of an agreement or contravention of law; (4) to establish, exercise or defend our legal rights; (5) when we believe disclosure is necessary or appropriate to prevent physical or other harm or financial loss; (6) in connection with an investigation of suspected or actual illegal activity; or (7) otherwise with your consent.

We reserve the right to transfer any personal information we have about you in the event of an actual or proposed sale or transfer of all or a portion of our business or assets (including in the event of a merger, acquisition, joint venture, reorganization, divestiture, dissolution or liquidation). If this occurs, we will inform you of the identity and contact information of the receiving party to the extent required by applicable law.

Except as required by applicable law and described in this privacy notice, Townsend will not share any other personal information about an investor with its affiliates or nonaffiliated third parties.

Data Transfers

We (or our third-party service providers) may transfer, access, store or otherwise process personal information we collect about you to recipients in countries other than the country in which the information originally was collected. Those countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your information to



recipients in other countries (such as the U.K.), we will comply with applicable legal requirements regarding the transfer of personal information.

If you are located in the EEA, the United Kingdom or Switzerland, we will comply with applicable legal requirements by providing adequate protection for the transfer of your personal information to recipients outside of these regions.

Retention of Personal Information

Please note that personal information may be retained by Townsend for the duration of an investor's investment or engagement with Townsend, and afterwards in accordance with Townsend's legal and regulatory obligations and policies.

How We Protect Personal Information

We have implemented and maintain administrative, technical and physical safeguards designed to protect personal information in our custody and control against accidental, unlawful, or unauthorized destruction, loss, alteration, access, disclosure, or use.

Changes to Privacy Policy

Townsend may modify its privacy policy at any time. If we make any changes to this Privacy Policy, we will provide notice of such changes, as appropriate (e.g., on our website or by an email notification to the address you have provided). For administrative changes, we may provide indication in our Privacy Policy by updating the "Last Updated" date at the top of this Policy.

How To Contact Us

If you have any questions about this Privacy Notice or the manner in which we, or our service providers on our behalf, treat your personal information, please contact us at aimee.may@townsend.com.