



Privacy Policy and Notice
As of September 30, 2019

These policies and procedures form part of the Compliance Manual of Episteme Capital Partners (Cayman), Ltd (“ECP Cayman”), Episteme Capital Partners (UK), LLP (“ECP UK”) and Episteme Capital Partners (US), LLC (“ECP US”) and together with “ECP Cayman” and “ECP UK”, “Episteme”). The Board of Directors of ECP Cayman has appointed a Compliance and Conflicts Committee consisting of Adrian Eterovic, Richard Leahy and Helaine Dryden to determine the appropriate policies and procedures for Episteme (UK) and Episteme (US). These policies and procedures shall remain in effect until further notice in writing approved by the Compliance and Conflicts Committee. Any questions of interpretation or implementation should be referred to the Compliance and Conflicts Committee or the Episteme’s legal department.

Episteme is committed to ensuring that any personal, nonpublic information which it may hold or control is protected and used in accordance with applicable privacy regulations, including but not limited to the EU General Data Protection Regulation (“GDPR”), Cayman Islands Data Protection Law (as amended) (“Cayman DPL”) and rules and regulations implemented by the US Securities Exchange Commission and the US Commodity Futures Trading Commission. As the amount and type of information we collect and maintain differs based on the nature of our relationship, we have divided this policy into three different categories:

- Individual Investors (including individual named beneficiaries) who have made an investment in the collective investment vehicles (“Funds”) which we manage (“Individual Investors”); this category includes individuals who are in the process of making an investment;
- Representatives of institutions (“Representatives”); this category includes representatives of institutions who have made an investment in the Funds, have opened a separate managed account with us, are in the process of making an investment or opening an account as well as representative of institutions with whom we have an on-going commercial relationship, such as representative of our various financial service providers and external consultants; and
- Potential Investors or Potential Clients (“Potential Clients”), including but not limited to individuals (1) whom we meet at various industry events, whose details are listed in industry databases to which we have access and/or to whom we have been introduced through various capital introduction services and/or (2) have requested to receive regular updates regarding the trading programs which we manage.

Individual Investors

We collect the following information from you:



- a) Information we receive from you on subscription agreements, investor questionnaires or other forms that you submit to us or contracts that you enter into with us;
- b) Information about your transactions with us, our affiliates or others; and
- c) Information obtained from meetings and telephone conversations with you.

Specific examples of the type of public personal information we collect include:

- Information we receive on subscription agreements or other forms, such as name, address, account or tax identification number and the types and amounts of investments;
- Information about transactions with us, or others, such as participation in other investment programs, ownership of certain types of accounts such as IRAs or other account data.

We process your data, relying primarily on the “legitimate interest ground”. Episteme’s legitimate interest, and purpose of processing your data, is related to ensuring you are a sophisticated investor and thus Episteme’s products are appropriate. We also process your data to meet our contractual obligations to you such as providing you with monthly updates of your investment in our Funds and providing annual tax documentation. Finally, we process your data to meet our legal obligations such as complying with anti-money laundering regulations and tax reporting.

We may disclose any of the information we collect, as described above, in connection with the activities of our investment funds and/or for other purposes to third parties and to our affiliates, including financial service providers, such as the Funds’ administrator, placement agents, broker-dealers, custodians, banks and others used to finance or facilitate transactions by or operations of our private funds. We may also disclose nonpublic personal information about you to nonaffiliated third parties as permitted by law and in accordance with the agreements governing your investment in our private funds, including: other service providers to our Funds, such as accounting, legal, or tax preparation services; transfer agents, brokerage firms and the like, in connection with distributions to our investors, and finally, with your consent, to other investors or potential investors.

Representatives

We collect your name, role, firm name, email address, business address and phone number. In addition, for certain Representatives who are directors of an Institution that is a client, we may collect information required under anti-money laundering regulations such as a copy of your passport. Finally, for certain Representatives with whom we have commercial relationship, we



may have collected your mobile phone number or other contact information in relationship to our business continuity planning.

We process your data, relying primarily on the “legitimate interest ground”. Episteme’s legitimate interest, and purpose of processing your data, is related to facilitating the relationship between the institution you represent and Episteme. We also process your data to meet our contractual obligations to you such as providing you We also process your data to meet our contractual obligations to you such as providing your institution with regular updates on its account and/or our trading programs. Finally, in certain circumstances, we process your data to meet our legal obligations such as complying with anti-money laundering regulations.

Potential Clients

We collect your name, firm name and email address. We may also collect your role, business address and phone number.

We process your data, relying primarily on the “legitimate interest ground”. Episteme’s legitimate interest, and purpose of processing your data, is related to facilitating the flow of information related to our programs and a possible future relationship.

Our procedures and your rights

Regardless as to your classification, we maintain physical, electronic and procedural safeguards to guard the nonpublic personal information that we have obtained from you. Your right to privacy extends to all forms of contact with us, including telephone, written correspondence and electronic media, such as e-mail and the Internet.

Under GDPR, and where applicable, Cayman DPL, you have the following rights in relation to our use of your information, including to:

- a. Request access to your information, which you can do by sending an email to legal@epistemecap.com;
- b. Update or amend your information if it is inaccurate or incomplete by sending an email to legal@epistemecap.com;
- c. Object to certain uses of your information by sending an email to legal@epistemecap.com;
- d. Request the deletion of your information in certain circumstances by sending an email to legal@epistemecap.com or by clicking the unsubscribe link from certain mailings; please note, we will not be able to delete your information if we are legally obligated to retain it at the time of the request though we will notify you in response to our request as to the timing when we will be able to delete your information;



- e. Withdraw any consents you have provided in respect of Episteme’s use of your information by (1) sending an email to legal@epistemecap.com or invrelations@epistemecap.com or (2) by clicking the unsubscribe link from certain mailings;
- f. Request the return of information you have provided to us; and/or
- g. Lodge a complaint with the Information Commissioner’s Office (<https://www.ico.org.uk/global/contact-us/email/>) as well as any other relevant supervisory authority, including the Cayman Islands Data Protection Ombudsman.

Under the privacy rules enacted by the CFTC, Individual Investors have the right to opt out of certain uses nonpublic personal information. An Opt-out form is attached to this policy as Annex A.

Transfer and Retention of Data

Your data is shared with our two offices, located in the UK and in the US. Data related to Individual Investors is also shared with the Funds’ Administrator located in Curacao and the Funds’ accountant located in the Cayman Islands. Information is shared with such providers based upon either (i) the jurisdiction having adequate privacy protection laws or (ii) appropriate data protections by ensuring the providers undertake appropriate legal protections through contractual obligation and/or adopting binding protocols.

Data is retained for varying lengths depending on the reason it was collected. For example, data related to tax reporting is maintained for 7 years (and is subject to extension if required).

Questions and changes to policy

If you have any questions regarding this policy, please email legal@epistemecap.com. We keep this privacy policy under regular review and circulate annually to Individual Investors and to others upon request.



Annex A

Disclosure Opt Out

If you prefer that we do not disclose nonpublic personal information about you to nonaffiliated third parties, you may opt out of those disclosures (other than disclosures permitted by law or the agreements governing your investment in our private funds); that is, you may direct us not to make those disclosures (other than disclosures permitted by law or the agreements governing your investment in our private funds). To opt out of disclosures to nonaffiliated third parties, you may return to us the Opt Out Form included below.

OPT OUT FORM

To be completed and returned in the event that you desire that we do not make disclosures to nonaffiliated parties discussed in the attached Privacy Notice, other than disclosures permitted by law or the agreements governing your investment in our private funds. Please return within 30 days of your receipt.

Systematic Quest Portfolio Company, Ltd.

Investor Name/Name on Account

Investor Contact Name

Signature

Date

Return to:

Episteme Capital Partners (US), LLC
800 Westchester Avenue Suite S-704
Rye Brook, NY 10573
Attention: Investor Relations
email: legal@epistemecap.com
Facsimile: (914) 358-1522