

EUROPEAN PRIVACY POLICY

EFFECTIVE MAY 2018

Graham Capital Management, L.P. and its affiliated companies process personal information. This Privacy Policy summarizes our policies with respect to personal information that we process of the following who are European natural persons: (i) clients and investors, (ii) the principals, beneficial owners and beneficiaries of clients and investors, and (iii) representatives of clients, investors and other businesses that we interact with (the "Data Subjects"). This Privacy Policy sets out the kinds of personal information we collect and how that personal information is used. Please read the following carefully to understand our views and practices regarding Data Subjects' personal information and how we will treat it.

Personal Information Collected

We may receive personal information from Data Subjects, either directly from the Data Subject or by the firm the Data Subject represents in connection with an actual or potential business arrangement between us and the Data Subject's firm. This information may include:

- *Category 1* – Contact information, such as name, title, address, business and/or personal telephone number, business and/or personal email address and contact history.
- *Category 2* – Verification information, such as passport, driving licence, utility bill, credit or bank card statement, wire transfer information, country of residence, country of origin/nationality, country of domicile/tax residency, tax reference number, date of birth, and occupation.
- *Category 3* – Financial information, such as the amount invested and details of the investment made, name of the organisation the Data Subject represents and basis for establishing degree of financial sophistication.
- *Category 4* – Work contact information, such as name, title, name of the business the Data Subject works for, business address, business telephone number, business email address and contact history.
- *Category 5* – Data gathered by our website(s) visited by Data Subjects that pertains to Data Subjects' usage of such website(s).

Purposes for Processing Personal Information

We may use the personal information held about Data Subjects for the following purposes:

- *Categories 1, 4 and 5* – To carry out our obligations arising from any agreement entered into with us by or on behalf of Data Subjects and the firms they represent, including to contact such individuals (including with information or messages about the investment services and products we provide under the agreement), and for administrative purposes.
- *Category 2* – To complete anti-money laundering checks and other checks as are required by law, regulation or contractual obligation required to enable us to provide services and products under agreements with Data Subjects or the firms they represent, which, if not conducted, would prevent us from carrying out our obligations arising under any such agreement and to comply with reporting requirements and information requests of applicable regulatory and tax authorities.
- *Category 3* – To determine eligibility to provide services and products and information thereon to Data Subjects and the firms they represent.
- *Categories 1, 4 and 5* – To communicate with current and prospective institutional clients and investors and other businesses through their natural person representatives.

Lawful Basis for Processing Personal Information

The lawful basis/bases that we rely upon to process personal information held about Data Subjects is as follows:

- *Category 1* – We use this personal information to carry out our obligations arising from the agreements entered into by Data Subjects (directly or on behalf of the firms they represent) related to the services and products we provide, to communicate with Data Subjects prior to entering into such an agreement, and to send information related to the products or services, to the extent allowed by applicable law and which are in our legitimate interests.
- *Category 2* - We use this personal information to comply with our legal obligations.
- *Categories 3 and 4* - We use this personal information to carry out our obligations arising from the agreements entered into by Data Subjects (directly or on behalf of the firms they represent) related to the services and products we provide, and where it is necessary for the purposes of the legitimate interests pursued by us that are not overridden by the interests or fundamental rights and freedoms of Data Subjects.
- *Category 5* – We use this personal information to carry out our obligations arising from the agreements entered into by Data Subjects (directly or on behalf of the firms they represent) related to the services and products we provide, where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests. For example, in order for us to operate our website it is necessary for us to collect certain data about you to improve your user experience and manage the website. In addition, we use this personal information to send informational messages to current and prospective clients and investors to the extent allowed by applicable law and which are in our legitimate interests.

Disclosure of Personal Information

We do not disclose any personal information about Data Subjects to any third parties, except:

- as is reasonably necessary or appropriate in connection with the management of the investment services and products we sponsor,
- to processors who are only permitted to use the information to perform services for us,
- as required by law or any applicable regulatory authority, or
- to protect the rights, property, or safety of our company, its clients or others.

In these cases, we may share personal information with legal and tax advisers, accountants, fund administrators, companies engaged to dispose of or store data (including personal information), consultants that require access to the data in connection with their provision of services to the company, and regulatory and tax authorities and adverse parties who have a legal right to receive such information and their counsel, experts and legal advisers.

We will take reasonably necessary steps to ensure that where personal information is shared, it is treated securely and in accordance with this notice and applicable laws.

Personal Information Retention

We will endeavour not to keep personal information in a form that allows a Data Subject to be identified for any period of time longer than is reasonably necessary for achieving the permitted purposes, consistent with our data retention policy. At the end of the applicable retention period, we may destroy, erase from our systems, or anonymise personal information as part of such efforts. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and applicable legal requirements.

Storage & Transfer of Personal Information

We maintain physical, electronic and procedural safeguards designed to protect Data Subjects' personal information, prevent unlawful or unauthorised processing of personal information, and prevent unauthorized disclosure of, or accidental loss of, or damage to, such information.

We may process personal information in, and transfer personal information to, countries that may not guarantee the same level of protection for personal information as the country in which Data Subjects reside.

Personal information will also be processed by staff who work for us and operate outside the European Economic Area. This includes staff engaged in, among other things, the provision of administration and support services. All such staff are subject to appropriate confidentiality and security obligations.

We restrict access to non-public personal information about Data Subjects to those of our employees and agents who need to know the information to enable us to provide services.

We will only transfer personal information to third party service providers if they agree to comply with the physical, electronic and procedural safeguards described above, or if they put in place adequate measures themselves.

Rights in relation to Personal Information

Data Subjects have certain rights in relation to their personal information, including the right to be informed about the collection and use of their personal information, as outlined in this Policy.

These include, where certain conditions are met:

- the right to request access to the personal information we hold about them,
- the right to have inaccurate information about them amended or updated,
- the right to object to processing of personal information about them,
- the right to withdraw consent at any time (where relevant),
- the right to have personal information about them erased or to restrict processing in certain limited situations,
- the right to data portability and to request the transmission of personal information about them to another organisation,
- the right to object to automated decision making that materially impacts them, direct marketing, and processing for research or statistical purposes, and
- the right to lodge complaints with applicable data supervisory authorities.

Data Subjects should use the contact information below to get more information and/or to make a formal request.

We will endeavour to keep the personal information we store about Data Subjects reasonably accurate and up-to-date by enabling clients and investors to correct it by request. Data Subjects should notify us if any of their personal information changes or if they become aware of any inaccuracies in the personal information we hold about them.

Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time and without prior notice.

Questions

If you have any questions in relation to this Privacy Policy, please contact info@grahamcapital.com.