

## **COMMONFUND CAYMAN FUND PRIVACY NOTICE**

The purpose of this notice (the “*Cayman Fund Privacy Notice*”) is to provide you with information on our use of your personal data in accordance with The Cayman Islands Data Protection Law, 2017 (the “*DPL*”). In this Cayman Fund Privacy Notice, “we”, “us” and “our” refers to the Cayman fund in which you are invested (each, a “*Cayman Fund*”), the relevant Commonfund investment manager (each, an “*Investment Manager*”) and its or their respective affiliates and/or delegates.

### **Investor Data**

By virtue of making an investment in the Cayman Fund and your associated interactions with us (including any subscription (whether past, present or future), including the recording of electronic communications or phone calls where applicable) or by virtue of you otherwise providing us with personal information on individuals connected with you as an investor (for example directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners or agents), you will provide us with certain personal information which constitutes personal data within the meaning of the DPL (“*Investor Data*”). We may also obtain Investor Data from other public sources. Investor Data includes, without limitation, the following information relating to you and/or any individuals connected with you as an investor: name, residential address, email address, contact details, corporate contact information, signature, nationality, place of birth, date of birth, tax identification, credit history, correspondence records, passport number, bank account details, source of funds details and details relating to your investment activity.

In our use of Investor Data, the Cayman Fund will be characterized as a “data controller” for the purposes of the DPL. The Cayman Fund’s affiliates and delegates may act as “data processors” for the purposes of the DPL.

### **Who this Affects**

If you are a natural person, this will affect you directly. If you are a corporate investor (including, for these purposes, legal arrangements such as trusts or exempted limited partnerships) that provides us with Investor Data on individuals connected to you for any reason in relation to your investment with us, this will be relevant for those individuals and you should transmit this document to such individuals or otherwise advise them of its content.

### **How We May Use Your Personal Data**

The Cayman Fund, as the data controller, may collect, store and use Investor Data for lawful purposes, including, in particular:

- (i) where necessary for the performance of our rights and obligations under the Subscription Agreement and/or the constitutional and operational documents of the Cayman Fund;
- (ii) where necessary for compliance with a legal and regulatory obligation to which the Cayman Fund is subject (such as compliance with anti-money laundering and FATCA/CRS requirements); and/or
- (iii) where necessary for the purposes of our legitimate interests and such interests are not overridden by your interests, fundamental rights or freedoms.

Please refer to the European Privacy Notice for more details about the data processing we conduct.

Additionally, the administrator for the Cayman Fund (the “*Administrator*”) may use Investor Data to, for example, provide its services to the Cayman Fund or to discharge the legal or regulatory requirements that apply directly to it or in respect of which the Cayman Fund relies upon the Administrator, but such use of Investor Data by the Administrator will always be compatible with at least one of the aforementioned purposes for which we process Investor Data.

Should we wish to use Investor Data for other specific purposes (including, if applicable, any purpose that requires your consent), we will contact you.

### **Why We May Transfer Your Personal Data**

In certain circumstances we and/or our authorized affiliates or delegates may be legally obliged to share Investor Data and other information with respect to your interest in the Cayman Fund with the relevant regulatory authorities such as the Cayman Islands Monetary Authority or the Tax Information Authority. They, in turn, may exchange this information with foreign authorities, including tax authorities.

We anticipate disclosing Investor Data to the following parties and their respective affiliates, and their respective employees, officers and directors (which may include certain entities located outside the Cayman Islands or the European Economic Area), who may process your personal data:

- (i) our affiliates;
- (ii) any unaffiliated placement agent the Cayman Fund has retained or may retain to perform marketing services on our behalf;
- (iii) our legal advisers, consultants and accountants;
- (iv) the Administrator;
- (v) third-party managers;
- (vi) third-party service providers and vendors, including companies engaged to dispose of or store data, including personal information;
- (vii) adverse parties who have a legal right to receive such information and their counsel, experts and legal advisers;
- (viii) courts, regulators and law enforcement.

We will also release information about you if you direct us to do so.

### **The Data Protection Measures We Take**

Any transfer of Investor Data by us or our duly authorized affiliates and/or delegates outside of the Cayman Islands shall be in accordance with the requirements of the DPL.

We and our duly authorized affiliates and/or delegates shall apply appropriate technical and organizational information security measures designed to protect against unauthorized or unlawful processing of Investor Data, and against accidental loss or destruction of, or damage to, Investor Data.

### **Getting in Touch**

Should you have any queries or wish to discuss your data protection rights with us, please call 888-823-3863 or email [InvestorServices@commonfund.org](mailto:InvestorServices@commonfund.org).