

Privacy Policy and Notice at Collection

Last updated January 31, 2025

Curzon Advisers Limited, together with its affiliates, unless expressly stated otherwise, (“Curzon,” “we,” “us,” or “our”) is committed to privacy and data protection. This Privacy Policy and Notice at Collection (“Notice”) describes the privacy practices that Curzon follows when collecting and using personal information collected from you through our fund and asset management services, this website <https://www.curzonadvisers.com/>, and the websites under the control of Curzon that link to this Notice (collectively our “services”).

This Notice explains who we are; what personal information we collect about you; how we use it (including who we share that personal information with) and your rights and choices regarding personal information about you. You can download a printable copy of this Notice here (for Website only).

All references to Curzon include not only Curzon Advisers Limited, but also, Curzon Advisers US, LLC, located at 1301 Solana Boulevard, Building 2, Suite 2300, Westlake, TX 76262, and our other affiliates, unless expressly stated otherwise.

Any questions or concerns regarding Curzon’s privacy and data protection practices can be directed to our Data Protection Officer at Curzon Advisers Limited, 40 George Street, 2nd Floor, London W1U 7DW, United Kingdom or info@curzonadvisers.com.

NOTICE AT COLLECTION

1. WHAT INFORMATION DOES CURZON COLLECT ABOUT ME AND WHY?

We collect information that identifies, describes, or is reasonably capable of being associated with you (“personal information”). The following discusses the categories of personal information we collect and have collected in the preceding 12 months, the sources we collect information from, and the business or commercial purposes for using personal information about you.

We may collect the following categories of personal information:

- *Identifiers.* Such as a real name, date of birth, place of birth, postal address, phone number, unique personal identifier, Internet Protocol address, email address, account name, unique identifier of device, or other similar identifiers.
- *Sensitive personal information.* Such as nation identification numbers, social security numbers, passport numbers, drivers’ license or similar identification card number.
- *Customer records.* Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)), such as name, signature, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
- *Protected classification characteristics.* Such as age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
- *Financial information.* Such as your bank account numbers, social security number, account transactions, account data, tax status, income, assets, risk tolerance, transaction history, investment activity, ownership percentage, capital investment, history of income and losses, source of funds, loan information, payment card number, cvv, billing address, and related financial information. This may be considered sensitive personal information in some jurisdictions.

- *Commercial information.* Records of funds or services purchased, obtained, invested in or considered, or other purchasing or consuming histories or tendencies.
- *Geolocation data.* Such as physical location or movements. We collect your IP address and infer location such as city or postcode therefrom.
- *Internet or other similar network activity.* As described in more detail in our Cookie Policy, if you use our services, we automatically collect information about your browsing and search history, interaction with the features of our services, and responses to advertisements.
- *Professional or employment-related information.* Such as current or past job history or performance evaluations.

We may use these categories of personal information for the following purposes:

- **To provide you with the funds and services that you have requested** - To administer our relationship with you and to carry out our obligations arising from the relationship between you and us, internal accounting and administrative purposes, verify personal information, manage performance of funds, assets, and co-investment vehicles (collectively “funds”), evaluate viability of acquisition or disposition, to process applications for purchases or services; to process admission of potential investors, to process payment for purchases or services, and to create and manage your account.

To provide you with funds and services we may collect and process: identifiers; customer records; commercial information; financial information; professional or employment-related information; sensitive personal information. We collect this information on the following lawful bases: consent, performance of a contract with you, compliance with our legal obligations, and pursuing our legitimate interests.

- **For analytics purposes** - For example, we may analyze personal information including your location, funds and/or services requested, age, time zone, IP address and URL visited, against our wider client base for internal business purposes, such as generating statistics and developing business plans, to improve our services and funds and the website. We may also aggregate and de-identify your information to create client segments and share with our affiliates and partners.

To perform analytics, we may collect and process: identifiers, commercial information, geolocation data, internet and other similar network activity, and inferences drawn from other personal information. We collect this information on the following lawful bases: pursuing our legitimate interests.

- **For non-marketing communications** - We may use personal information about you to communicate with you about important information in relation to the fund or service you have requested or other non-marketing communications. This includes: (i) to process and respond to your questions and/or inquiries; (ii) emailing you to verify your identity; (iv) notifying you that a particular service has been suspended for maintenance or terminated; (v) letting you know that we have updated this Notice or our Terms and Conditions; (vi) letting you know about any funds or services that you have requested invested in or purchased; or (vii) providing updates regarding the status of investments. We will never contact you to ask for your password, please be careful if you receive any communications from people requesting this information.

To provide non-marketing communications we may collect and process: identifiers. We collect this information on the following lawful bases: performance of a contract with you, compliance with our legal obligations, and pursuing our legitimate interests.

- **For site optimization and management** - For example we may use personal information provided to us to:
 - administer the website;
 - ensure the security of our networks and of your information; and

- improve the website and our other digital offerings (including to fix operational problems such as pages crashing and software bugs).

To support site optimization and management we may collect and process: internet and network information. We collect this information on the following lawful bases: pursuing our legitimate interests.

- **For business development purposes** - For example, we will use information we collect from you to verify the quality and effectiveness of services and compliance, improve our funds and services, and develop new funds and services.

To support business development, we may collect and process: identifiers; commercial information; financial information; or internet and network information. We collect this information on the following lawful bases: pursuing our legitimate interests.

- **For fraud prevention and detection purposes and to protect and defend the rights and property of Curzon, our employees, and business partners.**

For example, we will use information we collect from you to detect security incidents and comply with fund obligations, laws, and regulations. To support fraud prevention and detection we may collect and process: identifiers, customer records, financial information, or internet or other electronic network activity information. We collect this information on the following lawful bases: compliance with our legal obligations and pursuing our legitimate interests.

- **For employment application purposes** - For example, if you contact us in relation to your employment prospects, we will use personal information about you to consider you for current and future employment opportunities and to contact you with respect to employment opportunities at Curzon that you have expressed an interest in.

To support our employment application process, we may collect and process: identifiers; protected classification characteristics; or professional or employment-related information. We collect this information on the following lawful bases: performance of a contract with you, compliance with our legal obligations, and pursuing our legitimate interests.

- **To verify your identity** - For example, we may use personal information to verify your identity when evaluating a potential investment or asset acquisition or disposition, when preparing for your admission to a fund, if you have lost or forgotten your login credential.

To verify your identification, we may collect and process: identifiers or sensitive personal information. We collect this information on the following lawful bases: compliance with our legal obligations and pursuing our legitimate interests

- **Information that we collect automatically.** When you engage with Curzon, we may use Cookies and similar tracking technology to collect the following information about you automatically (for further information please see our Cookies Policy for more information): internet or other electronic network activity information, or geolocation data. We collect this information on the following lawful bases: pursuing our legitimate interests.

Change of purpose

We will only use personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use personal information about you for an unrelated purpose, we will notify you and we will explain the business purpose which allows us to do so.

Please note that we may process personal information about you without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

2. HOW LONG DOES CURZON KEEP PERSONAL INFORMATION?

We retain personal information in identifiable form only for as long as necessary to fulfill the purposes for which the personal information was provided to us or, if longer, to comply with legal obligations, to resolve disputes, to enforce agreements and similar essential purposes. To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of personal information, the purposes for which we process personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

3. FOR WHAT BUSINESS PURPOSE CAN CURZON USE PERSONAL INFORMATION ABOUT ME IN THIS WAY?

We are required to satisfy one or more of the reasons set out by applicable data privacy law before we can collect and use personal information.

Generally, our business purpose for collecting and using the personal information described above will depend on the personal information involved and the specific context in which we collect it. However, we will normally rely on the following reasons to collect and use personal information:

- **Performance of a contract**

Using your information may be necessary for us to perform our obligations under a contract with you or with a view to entering into such a contract. For example, where you have: (i) purchased services from us and/or invested in funds, we will need to use your information to provide those services and/or funds; (ii) applied to invest in fund, we will need to use your information to evaluate your application; (iii) provided a potential asset for acquisition, we will use your information to evaluate the asset; (iv) approached us in relation to employment opportunities, the collection and use of personal information is necessary to enable us to offer you the job role, process your acceptance of the offer, on-board you as an employee and fulfil our obligations as an employer.

- **Compliance with our legal obligations**

The collection and use of personal information may be necessary to enable us to meet our legal obligations. For example, to verify your identity or evaluate a potential investment or acquisition and undertake necessary due diligence checks.

- **Pursuing our legitimate interests**

Where such processing is not overridden by your interests or fundamental rights, we are permitted to use personal information where it is necessary to pursue our legitimate interests, for example to operate the website, and to improve our funds and services. We may have other legitimate interests and if appropriate we will make this clear to you at the relevant time.

- **Consent**

In some limited circumstances, we may rely on your consent to collect and use personal information. For example, we may rely on consent where you have approached us in relation to employment opportunities and have provided us with sensitive personal information, such as information in relation to your racial and ethnic origin, sexual orientation, religion, physical and mental health, disabilities or trade union membership.

- If we rely on consent, this will be made clear to you at the time we request your information. You can withdraw your consent at any point by using the mechanism provided at the time, or by contacting us using the contact details provided in the section “How do I contact Curzon?” of this Notice.

You may not always be required to provide the personal information that we have requested. However, if you choose not to provide certain information, you may not be able to take advantage of some of our services. Any information that is so required is clearly marked as mandatory. If you would prefer that we

not collect certain personal information from you, please do not provide us with any such information, or opt out of providing this information where applicable.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of personal information is mandatory or not (as well as of the possible consequences if you do not provide personal information).

If we collect and use personal information in reliance on our legitimate interests (or those of any third party), these interests will normally be as set out in this Notice.

If you have any questions or need further information concerning the business purpose on which we collect and use personal information about you, please contact us using the contact details provided in the section below marked "How do I contact Curzon?"

4. DOES CURZON SHARE PERSONAL INFORMATION ABOUT ME WITH ANYONE?

During the past 12 months, we may have disclosed the categories of personal information listed in the section marked "What Categories of Personal Information does Curzon Collect about Me and Why?" to the following categories of recipients:

- **With our affiliates** – We may make personal information available to Curzon affiliated companies to allow us to provide our funds and services to you, for the purposes described in this Notice, or as notified to you when we collect personal information about you.
- **With our service providers and business partners** - We engage third party service providers and business partners to perform functions on our behalf (for example, to support the website). This includes but is not limited to sharing information with the following types of service providers or business partners:
 - *relationship management databases and data management platforms* – that enable Curzon to manage your information in a safe and efficient manner;
 - *data analysis firms* –that provide insights and help us to analyze trends using the data that we and they hold;
 - *client support specialists* –that provide client support services on our behalf for Curzon funds and services;
 - *web-hosting companies* – to enable us to manage and improve the website;
 - *information technology and related infrastructure providers;*
 - *providers of information technology, administration, and human resource services;*
 - *email delivery providers;* and
 - *audit and professional service providers.*
- **As part of a business transfer** – Curzon may disclose personal information to an actual or potential buyer or seller (and its agents and advisers) in relation to any actual or proposed divestiture, merger, acquisition, joint venture, bankruptcy, dissolution, reorganization, or any other similar transaction or proceeding.
- **To comply with laws** – Curzon may disclose personal information to any competent law enforcement body, regulatory, government agency, regulators and public authorities who regulate our activities, fraud and crime prevention agencies, court or other third party where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person; and
- **To any other person with your consent to the disclosure.**

5. COOKIES POLICY

“Cookies” are small pieces of data provided by a website and stored on a computer by a web browser. We use Cookies to track how you use the services by providing usage statistics. Cookies are also used to allow product authentication to you based upon your browsing history and previous visits to the services. Information supplied to us using Cookies helps us to provide a better online experience to our visitors and users.

While this information on its own may not constitute personal information, we may combine the information we collect via Cookies with personal information that we have collected from you to learn more about how you use the services to improve them.

Types of Cookies

We use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your device until you delete them). Specifically, we use the category of Cookie known as “Performance and Analytical” Cookies. These Cookies allow us to collect certain information about how you navigate the services or utilize the products running on your device. They help us understand which areas you use and what we can do to improve them. Below is a representative list of the Cookies we use.

Performance/Analytical

Name	Provided By	Persistent or Session	Purpose
_ga	Google Analytics	Persistent: 2 years	Used by Google Analytics to register a unique ID that is used to generate statistical data on how the visitor uses the website over multiple sessions.
ga#	Google Analytics	Persistent: 2 years	Used by Google Analytics to register a unique ID that is used to generate statistical data on how the visitor uses the website over multiple sessions.
_gid	Google Analytics	Session: Expires when the session ends (usually within 24 hours).	Used by Google Analytics to register a unique ID that is used to generate statistical data on how the visitor uses the website over a single session.

We also use Google, a third-party analytics provider, to collect information about services usage and the users of the services, including demographic and interest-level information. Google uses Cookies in order to collect demographic and interest-level information and usage information from users that visit the services, including information about the pages where users enter and exit the services and what pages users view on the services, time spent, browser, operating system, and IP address. Cookies allow Google to recognize a user when a user visits the services and when the user visits other websites. Google uses the information it collects from the services and other websites to share with us and other website operators’ information about users including age range, gender, geographic regions, general interests, and details about devices used to visit websites and purchase items. We do not link information we receive from Google with any personally identifiable information. For more information regarding Google’s use of Cookies, and collection and use of information, see the Google Privacy Policy (available at <https://policies.google.com/privacy?hl=en>). If you would like to opt out of Google Analytics tracking, please visit the Google Analytics Opt-out Browser Add-on (available at <https://tools.google.com/dlpage/gaoptout>).

How to Control and Delete Cookies

Cookies can be controlled, blocked or restricted through your web browser settings. Information on how to do this can be found within the Help section of your browser. All Cookies are browser specific. Therefore, if you use multiple browsers or devices to access websites, you will need to manage your Cookie preferences across these environments.

If you are using a mobile device to access the services, you will need to refer to your instruction manual or other help/settings resource to find out how you can control Cookies on your device.

Please note: If you restrict, disable or block any or all Cookies from your web browser or mobile or other device, the services may not operate properly, and you may not have access to the services available through the services. Curzon shall not be liable for any impossibility to use the services or degraded functioning thereof, where such are caused by your settings and choices regarding Cookies.

To learn more about Cookies and web beacons, visit www.allaboutCookies.org.

6. THE EU AND UK GENERAL DATA PROTECTION REGULATION (“GDPR”)

Curzon is the controller of the personal information collected through the services. Any questions or concerns regarding Curzon’s privacy and data protection practices can be directed to our Data Protection Officer at info@curzonadvisers.com.

Residents of the EU and UK may be entitled to other rights under the GDPR. These rights are summarized below. We may require you to verify your identity before we respond to your requests to exercise your rights. If you are entitled to these rights, you may exercise these rights with respect to personal information about you that we collect and store:

- the right to withdraw your consent to data processing at any time (please note that this might prevent you from using certain aspects of the services);
- the right of access;
- the right to request a copy of personal information about you;
- the right to correct any inaccuracies in personal information about you;
- the right to erase personal information about you;
- the right to data portability, meaning to request a transfer of personal information about you from us to any other person or entity as chosen by you;
- the right to request restriction of the processing of personal information about you; and
- the right to object to processing of personal information about you.

You may exercise these rights free of charge. These rights will be exercisable subject to limitations as provided for by the GDPR. Any requests to exercise the above listed rights may be made to: info@curzonadvisers.com. If you are an EU or UK resident, you have the right to lodge a complaint with a Data Protection Authority about how we process personal information about you at the following website: https://edpb.europa.eu/about-edpb/board/members_en or <https://ico.org.uk/>.

International Transfers of personal information

Whenever we transfer personal information about you out of the EEA, we ensure a similar degree of protection is afforded to it by using a solution that enables lawful transfer of personal information to a third country in accordance with Article 45 or 46 of the GDPR (including the European Commission Standard Contractual Clauses).

For additional information on the mechanisms used to protect personal information about you, please contact us at info@curzonadvisers.com.

7. WHAT ARE MY DATA PROTECTION CHOICES AND RIGHTS?

State and country specific consumer privacy laws may provide their residents with additional rights regarding our use of personal information. The following Section applies to individuals who reside in specific jurisdictions that provide additional privacy rights, including, California, Colorado, Connecticut, Utah, Oregon, Texas, Montana, and Virginia.

7.1 Your Rights and Choices

Right to Access Specific Information and Data Portability Right. You have the right to request that we disclose certain information to you about our collection and use of personal information over the past twelve (12) months. Once we receive and confirm your verifiable consumer request, we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we disclosed personal information for a business purpose, the business purpose for which personal information was disclosed, and the personal information categories that each category of recipient obtained.

Right to Correct Information. You have the right to request we update personal information about you that is incorrect in our systems.

Right to Delete. You have the right to request that we delete any personal information about you that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) the personal information from our records, unless an exception applies.

Right to Opt-out of the sale or sharing of Personal Information for Cross-Contextual Behavioral Advertising. Curzon does not sell personal information or share personal information for cross-contextual behavioral advertising purposes.

Right to Limit Sensitive Personal Information Use. You have the right to limit the use of sensitive personal information regarding you.

Non-Discrimination. We will not discriminate against you for exercising any of your rights.

7.2 How to Exercise these Rights

To submit a request to exercise these rights you may use one of these three methods:

- **Email:** info@curzonadvisers.com
- **Phone:** (214) 756-6034
- **Submit a Request** (Website only)

For all requests, please clearly state that the request is related to “Your Privacy Rights,” indicate which type of request you are making, and provide your name, street address, city, state, zip code and an e-mail address or phone number where we may contact you. We are not responsible for notices that are not labeled or sent properly or that do not include complete information.

To appeal a decision regarding a consumer rights request, please submit your appeal using one of the three methods above. Your appeal should include an explanation of the reason you disagree with our decision. Within 60 days of receipt of an appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions.

Only you, or a person registered with the applicable Secretary of State that you authorize to act on your behalf, may make a verifiable consumer request related to personal information about you. You may also make a verifiable consumer request on behalf of your minor child.

You may only make such a request for access or data portability twice within a 12-month period. The verifiable consumer request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative, and describe your request with sufficient detail that allows us to properly understand, evaluate and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Making a verifiable consumer request does not require you to create an account with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response electronically. Any disclosures we provide will only cover the 12-month period preceding the receipt of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide the personal information that is readily usable and should allow you to transmit the information from one entity to another entity without hindrance

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

7.3 Opt-out Preference Signals

Our website honors General Privacy Control ("GPC") opt-out preference signals when such signals are configured through your browser. For more information on GPC opt-out preference signals please visit: <https://globalprivacycontrol.org/>

7.4 California Shine the Light Law

California Civil Code Section 1798.83 permits users who are California residents to obtain from us once a year, free of charge, a list of third parties to whom we have disclosed personal information (if any) for direct marketing purposes in the preceding calendar year. If you are a California resident and you wish to make such a request, please send an e-mail with "California Privacy Rights" in the subject line to info@curzonadvisers.com. or write us at: Curzon Advisers US Attention: Privacy Inquiries, 1301 Solana Boulevard, Building 2, Suite 2300, Westlake, TX 76262.

8. WHAT IF I ACCESS A THIRD-PARTY SITE THROUGH THE WEBSITE?

The website may contain links to or from third party sites. Please be aware that we are not responsible for the privacy practices of such third parties. This Notice applies only to the personal information we collect as described above. We encourage you to read the privacy policies of third-party sites you access from links on the website or otherwise visit.

9. DOES CURZON TRANSFER PERSONAL INFORMATION ABOUT ME TO OTHER COUNTRIES?

In order to provide our services, we may need to transfer and process personal information internationally (including to destinations outside the country in which you are located).

As a result, your information may be transferred to and/or processed in countries which may not guarantee the same level of protection for personal information as the country in which you reside. However, we have taken appropriate safeguards to ensure that personal information will remain protected in accordance with this Notice.

Further information can be provided on request: please contact us using the details found in the section "How do I contact Curzon?" We have also implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

10. HOW DOES CURZON SECURE PERSONAL INFORMATION?

We understand that you care how personal information is used and/or shared with others, and we value your trust and seek to safeguard personal information.

We implement appropriate technical and organizational security measures, including physical, administrative and technical safeguards to protect personal information from unauthorized access, use and disclosure.

The measures we use to protect personal information are designed to provide a level of security appropriate to the risk of processing personal information. However, please be aware that no electronic transmission of information can be entirely secure. We cannot guarantee that the security measures that we have in place to safeguard personal information will never be defeated or fail, or that those measures will always be sufficient or effective.

11. HOW OLD DO I HAVE TO BE TO USE THE CURZON SITES OR OTHER DIGITAL OFFERINGS?

You must be aged 13 or over to use the Curzon sites and our other digital offerings.

We take your privacy very seriously and we understand the importance of taking extra precautions to protect the privacy and safety of children who use our funds and services. We do not solicit or knowingly collect personal information from children aged 13 and under. If we are made aware that we have received such information, or any information in violation of our policy, we will use reasonable efforts to locate and remove that information from our records.

12. DOES THIS NOTICE EVER CHANGE?

We may update or modify this Notice from time to time in response to changing legal, technical or business developments. We will obtain your consent to any material Notice changes if and where this is required by applicable data protection laws. The date of the most recent version of this Notice will appear at the top of the page.

When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. For example, we will notify you of any changes to this Notice by posting a new Notice and updating the "last modified" date at the top of this page or by sending the new Notice to you via email, where appropriate.

13. HOW DO I CONTACT CURZON?

If you have any questions or comments about this notice, the ways in which we collect and use your information described in this Notice, or your choices and rights regarding such use please do not hesitate to contact us at:

E-mail: info@curzonadvisers.com

Postal Address:

United Kingdom: Curzon Advisers Limited, Attention: Data Protection Officer, 40 George Street, 2nd Floor, London W1U 7DW, United Kingdom

United States: Curzon Advisers US, LLC, Attention: Privacy Inquiries, 1301 Solana Boulevard, Building 2, Suite 2300, Westlake, TX 76262