



PRIVACY NOTICE FROM FIVE MILE CAPITAL

This Privacy Notice sets forth our policies with respect to non-public personal information (“Personal Information”) of current, prospective and former investors (“Investors”) in the Five Mile Capital funds. This Privacy Statement applies to, and is provided on behalf of, each of the Five Mile Capital family of companies. These policies apply to Investors in our Funds and may be changed at any time, provided a notice of such change is given to you.

Privacy is our Priority

We are committed to protecting Investors’ Personal Information. This Privacy Notice answers some questions about what Personal Information we collect, what we do with it, how we share it, and the methods we use to protect it.

We do not disclose any Personal Information about our Investors to any nonaffiliated third party, except as described below.

What Personal Information do we collect from you?

When you subscribe to become or are an Investor in our Funds, we obtain Personal Information from subscription applications and other forms you submit to us, from your dealings with us, from consumer reporting agencies and from third parties and other sources. For example:

- We collect information such as your name, address, e-mail address, telephone /fax numbers, assets, income and investment objectives through applications and other forms you submit to us.
- We may obtain information about account balances, your use of account(s) and the types of products and services you prefer to receive from us through your dealings and transactions with us and other sources.
- We may obtain information about your creditworthiness and credit history from consumer reporting agencies.
- We may collect background information from and through third-party vendors to verify representations you have made and to comply with various regulatory requirements.

How do we protect the security and confidentiality of Personal Information we collect about you?

We maintain physical, electronic, and procedural security measures to help safeguard the Personal Information we collect about you. We have internal procedures and require any service providers or contractors to do the same. Third parties that provide support services on our behalf may also receive Personal Information about you, and we require them to adhere to confidentiality standards with respect to such information.

When do we disclose Personal Information we collect from you?

We may disclose personal information we collect about you to affiliated companies and to nonaffiliated third parties.

a. Information we disclose to affiliated companies

We may share Personal Information within the Five Mile Capital family of companies for a variety of reasons, including managing your account(s) effectively, to service and process your transactions, to let you know about products and services offered by us and our affiliated companies, to manage our business, and as otherwise required or permitted by law. Direct access to Personal Information is limited only to those officers, directors or employees of Five Mile Capital companies who require access to that information in connection with Investors' accounts, and administration of our Funds.

b. Information we disclose to nonaffiliated third parties

We do not disclose Personal Information that we collect about you to nonaffiliated third parties except as follows:

Service Providers or Contractors

We use third-party contractors or service providers to process or service transactions for us or to perform functions for us or on our behalf. Examples include, but are not limited to, technical or computer-related support services or consulting. These third party contractors and service providers are required to abide by the terms of our Privacy Notice, and, if their functions require the ability to access Personal Information, they may access Personal Information only for the purposes for which they have been retained. They will not disclose Personal Information to any third parties except at our direction, and consistent with this Notice and applicable law.

Other Circumstances

In addition, we will disclose Personal Information when permitted by law to do so, such as to our attorneys, auditors, brokers and regulators and, in such case, only as necessary to facilitate the acceptance and management of our relationship with you. Thus, it may be necessary, under anti-money laundering and similar laws to disclose information about Investors in order to accept subscriptions from them. We will also release Personal Information about you if directed to do so, if compelled to do so by law, or in connection with any government or self-regulatory organization request or investigation, or when we suspect fraudulent or criminal activities. We also may disclose Personal Information when otherwise permitted by applicable privacy laws such as, for example, when disclosure is needed to enforce our rights arising out of any agreement, transaction or relationship with you.

What opt-outs of disclosure are available and how can they be exercised?

The law allows you to opt-out of our sharing Personal Information about you in certain circumstances with nonaffiliated companies; that is, you may direct us to not make such disclosures. We do not currently share information about you with any nonaffiliated third party that triggers this opt-out right. Therefore, there is no need for you to opt-out of such sharing with nonaffiliated third parties. If in the future we desire to disclose your information in a way that is inconsistent with this policy, we will notify you in advance and provide you with the opportunity to opt-out of such disclosure.

The law also allows you to opt-out of our sharing Personal Information about you in certain circumstances with affiliated companies. We do not currently share Personal Information about you among the Five Mile companies that would trigger this opt-out right.

Questions

You may contact Wanda Ocinaldi with any questions or concerns about this Privacy Statement at wocinaldi@fivemilecapital.com.