

## SCS CAPITAL MANAGEMENT LLC

### PRIVACY POLICY

As our client, you are entitled to know how we protect your nonpublic personal information and how we limit its disclosure.

This Privacy Policy applies to individuals and institutions who are clients of our firm, or individuals who invest in one of our funds, or have been clients or investors in the past. This Privacy Policy describes our policies and practices for collecting, disclosing, and safeguarding “nonpublic personal information,” which may include financial or other information about you, and, where required by applicable UK and European data privacy laws (the “European Privacy Laws”), other “personal data” (as defined under such European Privacy Laws) (together, the “personal information”). This Privacy Policy also describes the privacy rights under the General Data Protection Regulation (“GDPR”) and other European Privacy Laws and privacy rights under the California Consumer Privacy Act of 2018 (“CCPA”).

#### Information We Collect

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on your client agreements, account opening forms, subscription agreements, or other forms. This information includes, for example, your name, address, email address, social security number and/or other government issued identifiers, professional, educational, or employment-related information transactions, assets and income, and other financial information.

#### Information We Disclose

We do not disclose your nonpublic personal information to anyone, except as permitted or required by law. ***This means, most importantly, that we do not sell client information – whether it is your personal information or the fact that you are our client – to anyone.*** Instead, we use your information primarily to complete transactions that you request. Here are the details:

- To implement your wealth management plan, including the selection of investment managers, it may be necessary to provide identifying information to nonaffiliated third parties.
- To complete certain transactions or account changes that you request, it may be necessary to provide identifying information to nonaffiliated third parties, such as our funds’ third-party administrators and accountants.
- We share nonpublic personal information with our parent company affiliate Focus Financial Partners, LLC.
- In certain instances, we may contract with nonaffiliated third parties to perform services for us and, where necessary, disclose your information (described above) to them. In all such cases, we provide the third party with only the information necessary to carry out its assigned responsibilities and only for that purpose. Further, we require these third parties to treat your nonpublic information confidentially.
- Finally, we will release your nonpublic information if you direct us to do so, if we are required by law to do so or in other limited circumstances permitted by law – for example, to protect your account from fraud.

Where your personal data is processed by third parties outside the UK/European Economic Area, we will ensure appropriate safeguards are in place to adequately protect it, as required by applicable law, including the execution of standard contractual clauses if the recipients are not located in a country with adequate data protection laws (as determined by the European Commission) or certified under the EU-U.S. Privacy Shield framework.

### What Happens If You Close Your Account

If you decide to close your account(s), we will adhere to the privacy policies and procedures described in this notice.

### Who Has Access to Your Personal Information

We take seriously the obligation to safeguard your non-public personal data. We restrict access to your nonpublic personal information to those employees who need to know that information to provide products or services to you. We maintain physical, electronic, and procedural safeguards that comply with state and federal regulations to guard your nonpublic personal information. Details of our IT security measures are set out in our IT Policy.

### We Will Keep You Informed

This publication replaces all previous statements of our privacy policy. As required by law, we will notify you annually of our Privacy Policy. We reserve the right to modify this Privacy Policy at any time and will keep you informed of changes.

### For California Residents

SCS complies with the CCPA by providing California residents with the following rights with respect to their personal information:

The right to know what personal information SCS has collected, used, disclosed and sold. To submit a request to know, California residents may call SCS at 617-204-6400. California residents may also designate an authorized agent to make a request for access on their behalf on the Investment Manager's website at [www.scsfinancial.com](http://www.scsfinancial.com).

The right to request that SCS delete any personal information it has collected. To submit a request for deletion, California residents may call SCS at 617-204-6400. California residents may also designate an authorized agent to make a request for deletion on their behalf on SCS's website at [www.scsfinancial.com](http://www.scsfinancial.com).

When California residents exercise these rights and submit a request, SCS will verify their identity by asking them for their email address, telephone number, and/or information about their account with SCS. SCS will endeavor to honor customers' requests unless such a request conflicts with certain lawful exemptions under the CCPA. Please note that SCS is only required to honor such requests twice in a twelve (12) month-long period.

Exercise of these rights will have no adverse effect on the price and quality of SCS's services.

For the twelve (12) month-long period prior to the date of this Privacy Policy, SCS has not sold any personal information about its customers; nor does it have any plans to do so in the future.

### Your European Data Privacy Rights

We collect the personal information to fulfill our contractual obligations, our statutory obligations and/or the legitimate interests of a fund and for other purposes for which the fund has a lawful basis under the European Privacy Laws and other privacy laws, including: (i) for compliance with legal and regulatory requirements such as regulations aimed at prevention of money laundering or terrorist financing or "Know your Client" requirements, as well as to verify the status and/or eligibility of the limited partners of the fund (the "Limited Partners") to purchase limited partnership interests in the fund (the "Interests") and for compliance with tax reporting requirements; (ii) for purposes of reporting to, or communicating with, Limited Partners concerning their investment in a fund or appointment or engagement of the Fund consistent with our obligations to such Limited Partners; (iii) in connection with our investment activities, including investment due diligence or investment monitoring activities or in response to "Know your Client" requirements of counterparties; (iv) in connection with litigation, investigations, regulatory or governmental enquiries or for other legal or regulatory purposes involving the Fund; and (v) for other legitimate business interests.

In addition, we may, with consent, process the personal information in order to communicate with Limited Partners for marketing purposes. In this event, we may provide additional information that we believe may be of interest, including about funds or services, news updates, research or market commentary, conferences, or events offered by or in connection with a fund. You have the right to unsubscribe when you have provided your

consent to receive these communications by emailing SCS or by following the instructions in any such communication, e.g., by clicking on the link to unsubscribe.

We process and share the personal information in the United States and other countries that may have a lower standard of data protection laws compared to the European Privacy Laws (where applicable).

We retain personal information for a period of at least five years from the end of the calendar year of the date on which the relevant business relationship, for which purpose such personal information was provided, has ended. Limited Partners have certain rights relating to the personal information we hold in accordance with and subject to the applicable privacy laws, including the European Privacy Laws, to: (i) access their personal information; (ii) request the correction of their personal information that is inaccurate; (iii) have a copy of the personal data provided by the Limited Partner provided to another data controller (defined under the European Privacy Laws) where technically feasible; (iv) request the erasure of their personal information; and (v) request the restriction of processing of their personal information. All such rights are subject to our legal obligations and our entitlements under the European Privacy Laws to withhold personal information from disclosure and/or to retain personal information for our record-keeping obligations or legal rights and/or to continue using the personal information for the purposes for which we have collected it. To exercise any of these rights, please send a request to SCS. Please email SCS if you have any questions regarding our Privacy Policy. You may also make a complaint, in accordance with European Privacy Laws, to a supervisory authority in their country of residence.

Updating your details

If any of the information that you have provided to us changes, please let us know by sending an email to [scsadministration@scsfinancial.com](mailto:scsadministration@scsfinancial.com).