

FACTS	WHAT DOES CAPITAL FUND MANAGEMENT DO WITH YOUR PERSONAL INFORMATION?
WHY?	<p>As part of its business dealings, Capital Fund Management S.A and its Affiliates (as defined below) (collectively “CFM”) may need to collect and share certain personal information. Applicable law restricts how CFM may do so, and requires CFM to inform you about how we collect, share, and protect your personal information. This is the purpose of this notice; please read it carefully.</p> <p>For the purposes of EU Regulation n°2016/679 of 27 April 2016 (“General Data Protection Regulation” or “GDPR”), the data controller is Capital Fund Management S.A. or, as the case may be, any of its Affiliates. All Affiliates not based in the European Union have appointed Capital Fund Management S.A. as their representative for GDPR purposes.</p>
WHO?	<p>CFM collects and processes personal information from the below types of individuals:</p> <ul style="list-style-type: none"> ▪ Clients, investors and beneficiaries (current, prospective and former) and any of their directors, officers, employees, partners, shareholders or agents; ▪ Directors, officers, employees, partners, shareholders or agents of service providers (including counterparties); ▪ Individuals who contact CFM by email, phone or otherwise and any visitors of CFM or CFM’s website; ▪ Employees, contractors and other members of CFM’s staff (current, prospective and former); and ▪ Directors and officers of certain listed companies and other market participants.
WHAT?	<p>The types of personal information we collect and share depend on the product, service or relationship you have with us. This information may include any or some of:</p> <ul style="list-style-type: none"> ▪ Name, address, date of birth, nationality, photo ID, civil status, criminal records, social security number, tax identification number, proof of address; ▪ Company and title, phone number, fax number, email address, position, career summary; ▪ Financial information, medical information; ▪ Investment experience, objectives and risk appetite; ▪ Source of funds and source of wealth; ▪ Connection information including IP address. <p>CFM may receive this information from you, your representatives, third parties, public sources, or it may be collected using cookies when you access CFM’s website.</p>
WHAT FOR?	<p>CFM uses the information:</p> <ul style="list-style-type: none"> ▪ For our everyday business purposes - such as to fulfill our regulatory obligations, process your transactions, maintain your accounts(s) or respond to court orders and legal investigations; ▪ For our marketing purposes - to provide information about our products and services to you; ▪ For HR and career management purposes - to process job applications, manage payroll and benefits; ▪ To fulfil any contract between CFM and you, and to ensure compliance with applicable legal or regulatory requirements; ▪ To administer, maintain and improve CFM’s systems and website, including for security purposes; ▪ For research and portfolio management purposes (based on publicly available information on directors and officers of certain listed companies and other market participants only). <p>Given the specific purposes for which we envisage using your personal data, we do not anticipate being required to obtain your consent to do so. Should we wish to use your personal data for other specific purposes (including, if applicable, any purpose that requires your consent) we will endeavor to contact you.</p>
WITH WHOM?	<p>CFM may share your information with the following:</p> <ul style="list-style-type: none"> ▪ CFM’s Affiliates; ▪ Service providers and/or sub-contractors; ▪ Legal or regulatory authorities if CFM is required to do so under applicable rules.
CONTACT US	<p>Due to the limited scope of our personal information processing, we are not required to designate a data protection officer. For any questions or to exercise any of your rights described below, please contact CFM’s Chief Compliance Officer at compliance@cfm.com</p>

Who we are

Who is providing this notice?

Capital Fund Management S.A. and its Affiliates.

What we do

How does CFM protect my personal information?

To protect your personal information from unauthorized access and use, CFM has implemented security measures in compliance with applicable law. These measures include computer safeguards, secured files and buildings, as well as organizational measures such as giving access to your personal information only to the employees, agents or service providers that need it.

When information about you is disclosed to non-affiliated third parties (such as a fund administrator or a payroll processor, for instance), we require that the third party maintain the confidentiality of the information disclosed and limit the use of information by the third party solely to the purposes for which the information is disclosed or as otherwise required by law.

Where such third parties are located outside the European Union, CFM has taken steps to ensure that your personal information remains treated with an equivalent level of security as that applicable in the European Union.

How does CFM collect my personal information?

CFM collects your personal information, for example, when you:

- Provide information related to a subscription form, investor questionnaire, investor meeting, tax or account form, in person, by telephone, electronically or by another other means;
- Provide account balances and instruct transactions;
- Provide personal information to other financial institutions and service providers who have a contractual relationship with CFM and who are authorized to provide your personal information to CFM.

How long does CFM keep my personal information?

CFM will only keep your information for as long as it needs it to fulfil its obligations under a contract entered into with you, obligations under a contract entered into with third parties in your interest, or obligations under applicable laws and regulations. CFM may also retain your information for direct marketing purposes, to which you may object as described below. Generally, CFM will only retain your personal information for up to seven years after the end of your business relationship with CFM.

What are my rights?

Under GDPR, you have the right to:

- Access any personal information held about you at any time;
- Receive information regarding any entities we share your personal information with;
- Where this does not conflict with the execution of a contract with you or applicable laws and regulations, request that we rectify and/or erase personal information concerning you, restrict the use of your data in certain circumstances, or object to our processing of personal information concerning you;
- Receive all the personal information we have concerning you and/or request that we send it to another data controller;
- Lodge a complaint with the relevant personal data supervisory authority.

Definitions

Affiliates

Companies related by common ownership or control including Capital Fund Management International, Inc., CFM North America, Inc., Capital Fund Management LLP and any fund for which CFM or an affiliate serves as an adviser, investment manager, general partner, managing member, sponsor or in another similar capacity. They can be financial and nonfinancial companies.

Date of this document

March 28, 2024 (annually revised).