



Privacy Statement

This Privacy Statement describes how we at Odyssey Investment Partners, LLC (the “Manager”) including our funds, affiliates and subsidiaries (collectively, “we” or “Odyssey”) collect, use and share the personal data of individual investors and individuals associated with non-natural person investors (e.g., directors, trustees, employees, beneficial owners) in connection with investing in funds managed by Odyssey (the “Funds”).

For additional information on how we collect personal information, including our use of cookies, of our website visitors please visit <https://www.odysseyinvestment.com/privacy/>.

In this Privacy Statement, “we”, and “us” refer collectively to the general partners of our funds (the “General Partners”), the Manager, the Fund, and any affiliates. For the purpose of data protection laws, any of the Funds, the General Partners, and any affiliates thereof may be the controller of your personal information.

Why are you receiving this Privacy Statement?

In connection with your investment in the Funds, it is or will be necessary for us to process your personal information, or, in the case of a non-natural person Limited Partner (“Limited Partner”), personal information relating to the Limited Partner’s officers, directors, partners, members, ultimate beneficial owners, employees, or other relevant individuals.

This Privacy Statement replaces all previous privacy policies and may be amended by us at any time. If you are a former investor or otherwise end your relationship with us, we will continue to adhere to the policies and practices described in this Privacy Statement.

Our Collection and Sources of Personal Information

To facilitate and administer investments in the Fund, and for the purposes set out below, we have collected some or all of the following categories of personal information of individuals connected with investors, such as employees, directors and owners in the past twelve (12) months:

- Identifiers such as name, address, and other contact information; date of birth; picture; email address; usernames; copies of, or details from, passport and other official documentation for identity or address verification purposes; and other personal information obtained pursuant to standard anti-money laundering and client due diligence checks.
- Race, ancestry, citizenship, or natural origin if contained on official documents provided to us.
- Social Security Number, tax identification/status details, bank account information or other identification numbers.
- Information about investments with us and our affiliates, including commercial information such as bank account details, assets, income, wire instructions, brokerage account information, account data, and information about your participation in other investments that you provide to us in the course of transacting with us.



- Information about transactions with us, our affiliates or others, such as participation in other investment programs, ownership of certain types of accounts such as individual retirement account (IRAs) or other account data.
- Information we receive on subscription documents or other forms, including capital commitment, remaining capital commitment, and other relevant information.
- Information sent to us by affiliates or third parties regarding potential or actual investments.
- Professional or employment information, such as job titles, place of employment, employer details; or other source(s) of wealth.
- Communications with Odyssey personnel.
- Audio, electronic, visual, or similar information, including live video feed transcripts and other video technology recordings, and telephone recordings including voicemail.
- Preferences or characteristics that we obtain through meetings, telephone conversations, and other interactions we may have with you.
- Internet or other electronic network activity information, such as IP addresses when logging into our Limited Partner Portal.
- Other information that you send us from time to time.
- Inferences, such as your preferences or characteristics we obtained through the foregoing, including information regarding a Limited Partner's eligibility to invest in the Fund.

Some of the personal information we collect or that is provided to us may be considered sensitive or special category personal information, such as race, social security numbers, passport information, and financial account information. We use such personal information for the reasons described below and do not collect or use such personal information for the purposes of inferring characteristics about individuals.

How We Collect Personal Information?

We collect personal information from the following sources:

- You or your employer, financial intermediary or representative's correspondence, interactions and transactions with us, our affiliates and service providers, such as through subscription documents, investor questionnaires and communications.
- Public sources, such as public databases and social media sites such as LinkedIn.
- Consumer reporting agencies and other service providers we use to conduct required know-your-customer and anti-money laundering checks.

How We Use Personal Information

We collect, store, and process such personal information for the following legitimate business purposes:

- Performing services for you, including:
 - Processing and registering your initial investment, including administering, managing and setting up any account to allow investment in the Fund.



- Compliance with applicable company, banking, and financial laws; the laws or rules of local or foreign regulatory or law enforcement authorities; tax identification; and, if needed, reporting to regulatory bodies.
 - Updating you on the Fund's performance and other matters relating to its operation.
 - Ongoing operations, administrative, accounting, and other processes in order to operate the business such as processing redemptions and/or distributions.
- Complying with our legal and regulatory obligations and/or further our legitimate interest in doing so, such as preventing fraud and conducting "Know Your Client", anti-money laundering, terrorist financing, and conflict checks.
- Managing and administering our business; maintaining and improving relationships with investors; facilitating ongoing administration and performance; evaluating an investor's financial needs; marketing and promoting products and services, in line with our legitimate interest in operating our business efficiently.
- Making certain assessments about you in order to assess your investment objectives, risk tolerance, and understanding of investment risk to assess the suitability of an investment in Fund or other product offered by us or our affiliates; as necessary to discharge our legal and/or regulatory obligations, perform any contract with you, or further our legitimate interests in engaging in investment activities with you.
- Communicating with you regarding your relationship with us and/or our affiliates, to further our legitimate interest in progressing risk assessment and control; statistical and trend analysis; system administration, operation, testing, and support; and to operate control systems and management information systems.
- Managing risk and to further our legitimate interest in, or in some cases legal obligation to, protect against, identify, and prevent fraud and other unlawful activity.
- Managing litigation; complying with requests from regulatory, law enforcement, or other governmental agencies, as necessary to further our legitimate interest in establishing, exercising or defending our legal rights, or where we are obliged by law to do so.
- Investigating and responding to any complaints about our activities and business, maintaining quality, and dealing with complaints and disputes, to further our legitimate interest in protecting our business, and including as necessary to discharge applicable legal and regulatory requirements.
- Maintaining the safety, security, and integrity of our business, services, and technology assets, and to customize and secure your account with us, to further our legitimate interests in ensuring we operate a safe and secure IT environment.
- Accounting and managing our information technology systems and to further our legitimate interest in ensuring their ongoing security and integrity.
- Disclosing information to a governmental, tax or regulatory body, financial market, broker or other intermediaries, counterparties, court, auditors, or other third parties, and to conduct compliance activities, when it is necessary to further our legitimate interests, or those of a third party, in doing so.



- Establishing, exercising, or defending legal claims and in order to protect and enforce or ensure our rights, property, or safety; or to assist Limited Partners and associated individuals, or others, to do this where permissible under applicable law.
- For any other specific purpose (if any) where you have specifically consented to the processing of the personal information.

How We Disclose Personal Information

We may disclose certain categories of personal information described above to (i) our affiliates and service providers, (ii) our accountants, attorneys and placement agents in the ordinary course of business, (iii) to other Limited Partners.

We may disclose personal information for various business, commercial, and legal purposes, and for investors, subject to applicable laws, including:

- Where necessary to comply with our legal obligations, including when we believe in good faith that disclosure is legally required.
- To further our legitimate interest in exercising and complying with our rights and obligations under a regulatory or self-regulatory requirement (such as complying with a subpoena, or responding to court orders or legal investigations).
- To further our legitimate interest in managing and administering our business, including protecting your safety or security or protecting the safety and security of tangible or intangible property that belongs to us, to you or to third parties.
- To further our legitimate interest in establishing, exercising or defending legal claims.
- Upon consent of an investor to release such information, including authorization to disclose such information to persons acting in a fiduciary or representative capacity on behalf of the investor.

Within the past twelve months we have disclosed the categories of personal information listed above for the following business purposes to the following categories of parties:

- Disclosure to companies that provide services necessary to effect a transaction that you request, to service your account, or to otherwise provide services to us, such as accountants, attorneys, placement agents, other advisors, portfolio managers, custodians, banks, insurers, or other administrators in the ordinary course of business as necessary for the performance of our contract with you or to further our legitimate interest in operating our business.
- Disclosure to the fund administrator and any of its affiliates and other sub-processors as may be necessary to provide fund administration services for the purposes of carrying out anti-money laundering checks and administering your investment, as required by law or regulation or otherwise necessary for the performance of our contract with you.
- Disclosure to third party service providers engaged by us to facilitate our business (e.g., cloud computing and other IT infrastructure services), as necessary to further our legitimate interest in operating our business in an efficient manner.
- Disclosure to our advisers (e.g., auditors, legal counsel, and tax advisers) relating to or in connection with your investment, as required by law or regulation or where it is otherwise in our



legitimate interests to procure their services in order to further or safeguard our business interests or those of third parties.

- Disclosure of investor names to other Limited Partners where such disclosure is necessary for legitimate interests relating to the operation and/or administration of the Fund, including where such Limited Partners have expressly requested such information in connection with their investment in the Fund.

We may also disclose your personal information to:

- Government agencies, law enforcement, regulatory or tax authorities, and other governmental or public agencies or authorities to comply with our legal and regulatory obligations and as necessary to further our legitimate interest in protecting our business interests and legal rights.
- Disclosure to courts, parties to lawsuits, or other unrelated third parties in the context of legal proceedings where we are under a legal obligation to disclose the personal information or it is otherwise necessary to do so to further our legitimate interest in protecting our, or another's, commercial interests and/or legal rights.
- If we or any of our affiliates (or all or substantially all of our assets or the assets of any of our affiliates) are acquired, we expect that your personal information would be transferred along with the other business assets.
- Disclosure as otherwise required by law.

We will endeavor to ensure that any party that receives personal information from us will use it only for the services required and as allowed by applicable law or regulation, and is not permitted to share or use this personal information for any other purpose.

If you are a natural person and wish to opt-out of the disclosure of personal information to other LPs as described above, except as otherwise required by law, please call us at 212-351-7900 or fill out and return the form at the end of this Privacy Statement. We may request that you provide sufficient information so that we can identify you.

Data Retention

We will retain your personal information for as long as we reasonably require it for the purposes specified in this Privacy Statement, unless a longer period is required under applicable law or to resolve disputes or establish, defend, or exercise our legal rights. We will retain your personal information for at least as long as you are an investor—or the investor with which you are connected to is an investor—other than where we receive a valid request from you to delete your personal information. In determining data retention periods, we consider local laws, regulatory requirements and guidance, as well as contractual obligations and your reasonable expectations and requirements.

Cross-Border Transfer

Please note that we are located in the USA. Our operations involve affiliated entities and non-affiliated service providers based in various global locations, including jurisdictions outside of the EEA and the UK. Your personal information may, therefore, be transferred to, or processed in, those jurisdictions to enable us to operate and fulfil your investment, and meet our legal and regulatory obligations, including in countries that do not offer the same protections to personal information as within the European Economic



Area or the United Kingdom. In such cases, we will process personal information or procure that it be processed in accordance with the requirements of the Data Protection Legislation, which may include having appropriate contractual undertakings in legal agreements with service providers who process personal information on our behalf.

To the extent that your personal information is covered by the EU or UK GDPR, we will comply with applicable legal requirements to provide adequate protection for the transfer of personal information to recipients in countries outside of the EEA and UK respectively. In all such cases, we will only transfer your personal information:

- If the country to which the personal information will be transferred has been granted an adequacy decision by the European Commission or the UK government, as relevant.
- We have put in place appropriate safeguards in respect of the transfer, for example the EU Standard Contractual Clauses or UK International Data Transfer Agreement or Addendum.
- In the absence of an adequacy decision and where it is not possible to implement appropriate safeguards, we have another lawful basis for doing so.

You also may request a copy of the safeguards that we have put in place in respect of transfers of personal information by contacting our Chief Compliance Officer as set out below.

Your Rights

Depending on your state and country of residence, and subject to applicable laws, you may have a right to:

- Request access to your personal information and obtain a copy of the information we hold about you.
- Request that such personal information be deleted.
- Opt-out of the sale or sharing of personal information.
- Correct your personal information that we hold where it is incomplete or inaccurate.
- Object to the processing of your personal information.
- Require that certain of your personal information be transferred to you or a third party.
- Request that we restrict or block our processing of your personal information.
- Withdraw your consent to the processing of your personal information in certain circumstances.
- Lodge a complaint with the data protection regulator in your jurisdiction if you think that any of your rights have been infringed by us.

To submit such a request, please contact our Chief Compliance Officer as set out below. We will confirm receipt of your request and request any additional information in order for us to verify your request.



To the extent that your personal information is covered by the EU or UK GDPR and you would like to make a request regarding the rights outlined above, in most cases we are required to respond to your request within one month, and you typically will not be charged a fee in connection with any legitimate requests.

If you choose to exercise your rights, we will not deny services, offer a different quality of service or otherwise discriminate against you for exercising any of your rights listed in this Privacy Statement. However, as explained above, we require your personal information to be able to comply with our legal and regulatory obligations, to operate the Fund, and to perform your investment. Accordingly, if you do not provide personal information requested, we will not be able to accept your subscription application. Depending on the circumstances, if you have consented to our processing of personal information and later revoke that consent, you may no longer be able to remain invested in the Fund or the services and/or information we provide you may be limited (e.g., if you revoke consent to receiving communications from us about future investment opportunities).

We note that these rights are not absolute and some certain state and national privacy laws do not provide these rights to their residents. Therefore, we may decline your request in certain cases as permitted by law.

Additional Information for California Residents

This section provides additional information for California residents only. The California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act, and/or its implementing regulations (collectively, the "CCPA") provide protections and rules with respect to personal information as defined under the CCPA, which includes information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household.

To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to your personal information or complying with your request. If we are successful in validating your identity, we will respond to your request within the time and in the manner required by the CCPA. If we are unable to verify your identity, we will need to deny your request. We reserve the right to deny requests in certain circumstances, such as where we have a reasonable belief that the request is fraudulent.

If you request to know, access, delete and/or correct your personal information, we may require you to provide any of the following information: address, date of birth, state or country of residence, telephone number, email address or details of a transaction. In addition, if you ask us to provide you with specific pieces of personal information, we may require you to sign a declaration under penalty of perjury that you are the consumer whose personal information is the subject of the request. We will use the information you submit and the information we have in our systems to try to verify your identity and to match the personal information we have collected about you, if any, to your identity.

If you designate an authorized agent to make an access or deletion request on your behalf, we may require you to (a) provide the authorized agent written permission (e.g., via a notarized letter) to do so, and (b) verify your own identity directly with us (as described above), and confirm with us that you provided the authorized agent permission to submit the request.

We do not use personal data for the purposes of cross-context behavioral advertising nor do we sell personal data to third parties, including in the past 12 months.



Security

To protect the personal information of individuals, subject to applicable law, we permit access only by authorized employees who need access to that information to provide services to the Fund and its Limited Partners. To safeguard non-public personal information of our LPs, we endeavor to maintain physical, electronic and procedural safeguards that comply with U.S. federal standards.

Questions and Contact Information

If you have any questions about the Privacy Statement, want to ask for a record of the information we hold about you, ask us to delete or correct your information, or to exercise any other of your rights outlined above you may contact the Chief Compliance Officer by telephone at 212-351-7900, by email at vhadis@odysseyinvestment.com or send your questions or concerns in writing to:

Odyssey Investment Partners
590 Madison Avenue
39th Floor
New York, New York 10022
Attn: Chief Compliance Officer