

FEB '24

# LMR Partners Privacy Policy Statement

FEB 2024

**lmr partners**

## LMR Investment Group Privacy Notice<sup>1</sup>

LMR Investment Group<sup>2</sup> (the “Firm”, “LMR”) is required by CFTC Regulation 160 and under SEC’s Regulation S-P, as well as other federal, state and global regulations<sup>3</sup>, to adopt certain procedures designed to maintain and secure the “Non-Public Personal Information” of its clients from inappropriate disclosure to third parties.

The following “Privacy Notice” is designed to meet the standards set forth in the aforementioned regulations.

LMR is committed to keeping Non-Public Personal Information collected from potential, current, and former clients confidential and secure. The proper handling of Non-Public Personal Information is one of our highest priorities. The Firm never sells information relating to its clients to any outside third parties.

### Scope

LMR has adopted this Privacy Policy, which applies to LMR, the private investment vehicles it manages and LMR’s affiliates. LMR conducts its business affairs primarily through its employees, to whom this Privacy Policy applies. To the extent that service providers are utilized in servicing accounts, confidentiality agreements that comply with Regulation S-P will be put in place.

### Client Information

LMR only collects and keeps information which is necessary for it to provide the services requested by its clients, and to administer clients’ business with the Firm. The Firm may collect Non-Public Personal Information from clients or potential clients when they complete a subscription document or other form. This may include information such as name, address, social security number, assets, income, net worth, copies of financial documents, and other information deemed necessary to evaluate the client’s financial needs.

This information may be obtained as a result of transactions with the Firm, its affiliates, its clients, or others. This could include transactions completed with the Firm or information received from outside vendors to complete transactions or to effect financial goals.

### Sharing Information

The Firm only shares the Non-Public Personal Information of its clients with non-affiliated companies or individuals (i) as permitted by law and as required to provide services to clients, such as with representatives within our firm and securities clearing firms, or (ii) to comply with legal or regulatory requirements. The Firm may also disclose Non-Public Personal Information to another financial services provider in connection with the transfer of an account to such financial services provider. Further, in the normal course of our business, the Firm may disclose information it collects about clients to companies or individuals that contract with the Firm to perform servicing functions such as recordkeeping or computer-related services.

Companies hired to provide support services are not permitted to use Non-Public Personal Information for their own purposes and are contractually obligated to maintain strict confidentiality and abide by applicable law. The Firm limits use of Non-Public Personal Information to the performance of the specific service requested. The Firm does not provide its clients’ Non-Public Personal Information to mailing list vendors or solicitors for any purpose.

### Opt-Out Notice

If LMR plans to disclose nonpublic personal information (other than pursuant to certain exceptions), LMR will provide clients a reasonable means to “opt-out” of the disclosure of that information, in compliance with Regulation S-P. Once a client elects

<sup>1</sup> Updated February 2024

<sup>2</sup> LMR Investment Group includes LMR Partners LLP (UK), LMR Partners Limited (HK), LMR Partners LLC (US), LMR Partners AG (Switzerland), and LMR Partners (DIFC) Limited (UAE).

<sup>3</sup> LMR also has a General Data Protection Regulation (“GDPR”) compliant policy in place which can be found on LMR’s website [www.lmrpartners.com/privacy](http://www.lmrpartners.com/privacy).

to opt-out, LMR must honor the election as soon as reasonably practicable. The opt-out election remains in effect until the client revokes it.

## Employee Access to Information

Only employees with a valid business reason have the ability to access a client's Non-Public Personal Information. These employees are educated on the importance of maintaining the confidentiality and security of this information. They are required to abide by our information handling practices.

## Protection of Information

The Firm maintains security standards to protect clients' Non-Public Personal Information, whether written, spoken, physical, or electronic. The Firm updates and checks its physical mechanisms and electronic systems to ensure the protection and integrity of information.

## Document Destruction

LMR is required to take reasonable measures to guard against access to client information when disposing of it, such as shredding such information, entering into a contract with a company that is in the business of disposing of client information in a manner consistent with Regulation S-P, destroying or erasing electronic documents that contain client information and monitoring employee compliance with disposal and destruction procedures.

## Maintaining Accurate Information

The Firm's goal is to maintain accurate, up-to-date client records in accordance with industry standards. The Firm has procedures in place to keep information current and complete, including timely correction of inaccurate information.

## E-Mail

Should clients send the Firm questions and comments via e-mail, the Firm will share the client's correspondence only with those employees or agents most capable of addressing the client's questions and concerns.

The Firm will retain all written communication until it has done its very best to provide the client with a complete and satisfactory response. Ultimately, the Firm will either discard the communication or archive it according to the requirements under applicable law.

Please note that, unless expressly advised otherwise, the Firm's e-mail facilities do not provide a means for completely secure and private communications. While every attempt will be made to keep client Non-Public Personal Information confidential, from a technical standpoint, there is still a risk of unauthorized disclosure. For that reason, please do not use e-mail to communicate information to the Firm that is considered to be confidential. If the client wishes, communications with the Firm may be conducted via telephone.

## Rights for California Residents

Under applicable privacy laws or regulations, you may have the following rights in relation to your personal information:

- Right to access your personal information or request information regarding your personal information.
- Right to request erasure of your personal information.
- Right to data portability/receive the personal information that you provided to LMR in a structured, commonly used, and machine-readable format.

## Privacy Notice Supplement<sup>1</sup>

**Our Commitment to Your Privacy:** We are sensitive to the privacy concerns of our individual limited partners. We have a long-standing policy of protecting the confidentiality and security of information we collect about you. We are providing you with this notice to help you better understand why and how we collect certain personal information, the care with which we treat that information, and how we use that information.

**Sources of Non-Public Information:** In connection with forming and operating our private investment funds (or “funds”) for our investors, we collect and maintain non-public personal information from the following sources:

- Information we receive from you in conversations over the telephone, in voicemails, through written correspondence, via e-mail or in subscription agreements, investor questionnaires, applications or other forms (including, without limitation, any anti-money laundering, identification, and verification documentation);
- Information about your transactions with us or others; and
- Information captured on our website, extranet and/or investor reporting portal (as applicable), including registration information, information provided through online forms and any information captured via “cookies.”

**Disclosure of Information:** We do not disclose any non-public personal information about you to anyone, except as permitted or required by law or regulation and to service providers, including but not limited to administrators, lenders, banks, auditors, law firms, governmental organizations and self-regulatory organizations, consultants and placement agents.

**Former Investors:** We maintain non-public personal information of our former investors and apply the same policies that apply to current investors.

**Information Security:** We consider the protection of sensitive information to be a sound business practice, and to that end we employ physical, electronic and procedural safeguards to protect your non-public personal information in our possession or under our control.

**Further Information:** We reserve the right to change our privacy policies and this Privacy Notice at any time. The examples contained within this notice are illustrations only and are not intended to be exclusive. This notice complies with the privacy provisions of Regulation S-P under the Gramm-Leach-Bliley Act and certain privacy provisions of other laws. You may have additional rights under other foreign or domestic laws that may apply to you, including as set forth in our additional privacy notices.

## Privacy Notice Supplement for California Residents

This notice supplements the Privacy Notice set forth above with respect to specific rights granted under the California Consumer Privacy Act of 2018 (the “CCPA”) to natural person California residents and provides information regarding how such California residents can exercise their rights under the CCPA. This supplement is only relevant to you if you are a resident of California as determined in accordance with the CCPA. Information required to be disclosed to California residents under the CCPA regarding the collection of their personal information that is not set forth in this CCPA supplement is otherwise set forth above in the Privacy Notice.

**Categories of Personal Information We Collect:** We have collected some or all of the following categories of personal information from individuals within the last 12 months:

- name, date of birth and birthplace;
- contact details and professional address (including physical address, email address and telephone number);
- account data and other information contained in any document provided by investors to authorized service providers (whether directly or indirectly);
- information regarding your use of our website, fund data room and investor reporting portal (e.g., cookies, browsing history and/or search history);
- risk tolerance, transaction history, investment experience and investment activity;

<sup>1</sup>This Privacy Notice is intended only for individuals and certain entities that are essentially “alter egos” of individuals (e.g., revocable grantor trusts, IRAs or certain estate planning vehicles).

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- information regarding investors' status under various laws and regulations, including social security number, tax status, income and assets;
- accounts and transactions with other institutions;
- information regarding a potential and/or actual investment in the applicable fund(s), including ownership percentage, capital investment, income and losses;
- information regarding citizenship and location of residence;
- source of funds used to make the investment in the applicable fund(s); and
- anti-money laundering, identification (including passport and drivers' license) and verification documentation.

We share the above categories of personal information with third-party service providers as set forth in "Disclosure of Information" in the Privacy Notice above.

Purposes for Collecting Personal Information: We may collect or share the personal information we collect about you for one or more of the following business or commercial purposes:

- performing services to you, including but not limited to:
  - the administrative processes (and related communication) in preparing for the admission of investors to the fund(s);
  - ongoing communication with potential investors, their representatives, advisors and agents (including the negotiation, preparation and signature of documentation) during the process of admitting potential investors to the fund;
  - the performance of obligations under the governing documents of the funds (and all applicable anti-money laundering, KYC and other related laws and regulations) in assessing suitability of potential investors in the applicable fund;
  - ongoing operations, administrative, accounting, reporting, account maintenance and other processes and communication required to operate the business of the funds in accordance with its governing documents and other documentation between the parties, including customer service, processing or fulfilling transactions, verifying personal information, processing contributions and distributions and financing;
  - keeping investors informed about the business of the general partner or managing member of the applicable fund and its affiliates generally, including offering opportunities to make investments other than to the applicable fund and related advertising;
- auditing and verifications related to investor interactions, including but not limited to, verifying the quality and effectiveness of services and compliance;
- detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity; and
- complying with U.S., state, local and non-U.S. laws, rules and regulations.

We do not sell any of the personal information we collect about you to third parties.

Deletion Rights: You have the right to request that we delete any of your personal information that we retain, subject to certain statutory exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations.

Disclosure and Access Rights: You have the right to request that we disclose to you certain information regarding our collection and use of personal information specific to you over the last twelve (12) months. Such information includes:

- The categories of personal information we collected about you;
- The categories of sources from which the personal information is collected;
- Our business or commercial purpose for collecting such personal information;
- Categories of third parties with whom we share the personal information;
- The specific pieces of personal information we have collected about you; and
- Whether we disclosed your personal information to a third party, and if so, the categories of personal information that each recipient obtained.

No Discrimination: We will not discriminate against you for exercising your rights under the CCPA, including by denying service, suggesting that you will receive, or charging, different rates for services or suggesting that you will receive, or providing, a different level or quality of service to you.

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How to Exercise Your Rights: To exercise any of your rights under the CCPA, please submit a request using any of the methods set forth below.

- 1) Call us using the following number: 001 (646) 891-5738.
- 2) Submit a request online using the following online form: <https://www.lmrpartners.com/about/#contact-link>.
- 3) Email us at [compliance@lmrpartners.com](mailto:compliance@lmrpartners.com)

Our goal is to respond to any verifiable consumer request within 45 days of our receipt of such request. We will inform you in writing if we cannot meet that timeline.

## Exercising Your Rights (California Residents)

If you would like to request information about the Firm's processing activities with respect to your personal information or would like to exercise your rights, as described above, please contact LMR via the above methods. LMR does not charge for this service. For your protection, LMR will need to verify your identity prior to complying with your request.

LMR will make a good faith effort to provide you with the requested information without undue delay, but no later than required by law. LMR reserves the right to limit or deny access to the requested information where providing such information would be unreasonably burdensome or expensive, or as otherwise permitted under relevant laws or regulations. If LMR determines that the requested information cannot be provided in any particular instance, LMR will provide the requestor with an explanation for why the information cannot be provided.

## Disclosure

The Firm recognises and respects the privacy concerns of its potential, current, and former clients. The Firm is committed to safeguarding this information. As a member of the financial services industry, the Firm is providing this Privacy Notice for informational purposes to US clients/investors. The Firm will distribute and update it as required by law. It is also available upon request.

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[Imrpartners.com](http://Imrpartners.com)