

U.S. General Privacy Notice

At 1607 Capital Partners, LLC and its affiliates (hereinafter “1607,” “we,” “our” or “us”), maintaining our customers’ trust and confidence is of paramount importance. We are committed to safeguarding your personal information and providing you with facts and options about how this information may be shared. Please read this notice to learn more about our privacy policies and the options available to you.

This notice replaces all previous notices of our privacy policy, and may be amended at any time. We will provide you with revised policies if there are any changes in how we handle your personal information. If you end your relationship with 1607, we will continue to adhere to the policies and practices described in this notice. Additional information on our privacy practices is available on our website: www.1607capital.com

Information That We Collect. All financial companies need to share customers’ personal information to run their everyday business. As part of providing you with our services, we obtain nonpublic personal information about you, which may include the following:

- Information we receive from you on applications or other forms including name, address, social security number, risk profile, assets, and income.
- Information about your transactions with us or others.

Information That We Share & Why It Is Important. We use or share information in a limited and carefully controlled manner. We do not disclose any nonpublic information about our customers or former customers to anyone, except as permitted by law, unless authorized by you. Instances in which we may share your information with nonaffiliated third parties include:

- Disclosure to nonaffiliated companies that provide services necessary to effect a transaction that you request or to service your account such as prime brokers, accountants, banks, attorneys, custodians, or administrators.
- Disclosure to government agencies, courts, parties to lawsuits, or regulators in response to subpoenas. In such cases, we share only the information that we are required or authorized to share.
- Disclose of the existence of a client relationship between you (entity name only) and us on a representative client list used in one-on-one marketing presentations. You may opt out of inclusion on this list.

We do not otherwise disclose your nonpublic personal and financial information to nonaffiliated third parties, unless required or requested to do so by a court order, judicial subpoena or regulatory inquiry, or otherwise where we believe in good faith that disclosure is required or permitted by law and regulation, but we may disclose such information to our affiliates and their directors, officers, and employees. Because we do not disclose your nonpublic personal and financial information to nonaffiliated third parties except as noted above, our Privacy Notice does not contain opt-out provisions other than opting out of inclusion on a representative client list.

Confidentiality and Security. The security of your account information is important to us. Only those persons who need your information to perform their job have access to it. In addition, we maintain physical, electronic and procedural security measures that comply with federal regulations to protect your information. Our employees have limited access to your personal information based upon their

responsibilities. All employees are instructed to protect the confidentiality of your personal information as described in these policies, which are strictly enforced.

If you have any questions about this Privacy Notice, you may call us at (804) 525-1750

Updated: February 2023

California Consumer Privacy Act Privacy Notice

We respect your concerns about privacy. This California Consumer Privacy Act Privacy Notice (this “CCPA Privacy Notice”) describes the privacy practices of 1607 with respect to personal information we collect or obtain about California residents who are covered by the CCPA.

We maintain administrative, technical and physical safeguards designed to protect personal information against accidental, unlawful or unauthorized destruction, loss, alteration, access, disclosure or use.

Who this privacy notice applies to

This CCPA Privacy Notice applies to you if you are a California resident who has invested in, obtained, or sought to invest or obtain, a product managed by or service provided to or from 1607. This CCPA Privacy Notice also applies if you are a California resident who has applied for a position of employment with, or been recruited by, 1607.

If you do not fall within the categories described above, and are an investor or client of 1607, our General Privacy Policy applies to you.

Sources and Categories of Personal Information We Collect

When you visit our website (1607Capital.com), we may collect personal information directly from you. The categories of personal information we may collect from you when you visit our website are described in the “Personal Information” section of our General Privacy Policy.

We may also collect personal information directly from you and from other sources through offline means. This includes contact information (such as name, postal address, email address, and telephone number), resume information, publicly available information and demographic information, from public sources and third parties (such as data aggregators) who help facilitate our marketing, analytics and recruiting efforts.

Business or Commercial Purposes for Collecting Personal Information

We use the personal information you provide to us through our website for various business or commercial purposes.

We use the personal information we collect about you through offline means to: provide you information about our products and services; conduct marketing and advertising; perform market research; perform data analytics; help enhance or improve our products and services; manage our recruiting efforts and career opportunities; prevent fraud; and perform IT and administrative support functions.

Categories of Third Parties with Whom We Share Personal Information

1607 does not and will not sell your personal information.

We may disclose your personal information to our subsidiaries and affiliates and their respective employees, officers and directors, and service providers, so we can provide you information about our products and services, as well as perform various business functions, such as data analytics, marketing and advertising, market research, mailings, recruiting and hiring, fraud prevention, and other IT and administrative support functions. The personal information disclosed to them may include your contact information (such as name, postal address, email address and telephone number), and demographic information. When appropriate, we de-identify and/or hash your personal information before sharing it with third parties. We do not authorize our service providers to use or disclose the information, except as necessary to perform services or functions on our behalf, or to comply with legal requirements.

We also may share personal information with third parties (1) if we are required to do so by law, regulatory, or legal process (such as a court order or subpoena); (2) in response to requests by government agencies, such as law enforcement authorities or regulators; (3) to establish, exercise or defend our legal rights; (4) when we believe disclosure is necessary or appropriate to prevent physical or other harm or financial loss; (5) in connection with an investigation of suspected or actual illegal activity; or (6) in the event we sell or transfer all or a portion of our business or assets (including in the event of a reorganization, dissolution or liquidation); (6) on a representative client list listing entity name during one-on-one marketing presentations.

Rights Under the CCPA and How to Exercise Them:

If you are a California resident whose personal information is covered by the CCPA and this CCPA Privacy Notice, you may have certain rights under the CCPA as listed below. We will comply with your request in accordance with, and to the extent permissible under, applicable law and regulation.

Access:

You have the right to request that we disclose to you the following information about the last 12 months:

- The categories and specific pieces of personal information we have collected about you;
- The categories of sources from which your personal information was collected;
- The business or commercial purpose for collecting or selling your personal information (we do not sell and will not sell your personal information); and
- The categories of third parties with whom we have shared your personal information.

Deletion:

You have the right to request that we and our subsidiaries, affiliates, and service providers delete any personal information we have collected from you. We, and our service providers, will not delete your personal information if it is necessary or permissible for us or our service providers to maintain the personal information pursuant to the CCPA or other applicable law or regulation.

Information About Our Sharing Of Personal Information:

You have the right to request that we disclose to you the following information about the last 12 months:

- Whether we have sold your personal information (please note that we do not and will not sell your personal information); and
- The categories of personal information we have disclosed about you for a business purpose and the categories of third parties to whom the personal information was disclosed.

You can exercise your rights listed above or reach out to us with questions or concerns about our privacy policies and practices by emailing us at clientservice@1607capital.com

When you submit a CCPA request, we will ask you to provide certain verification information, such as your name, phone number, postal address, email address, and date of birth. This information will be used to help us detect potential fraud, verify your identity, and fulfill and respond to your request. Upon receiving a CCPA request, we will call you using the phone number you provide to request your Social Security Number to further verify your identity and answer a few authentication questions. We will not store or use this information for any other purpose.

If you decide to designate an authorized agent (other than through a power of attorney) to submit a CCPA request on your behalf, we require that you provide the authorized agent written permission to do so and verify your own identity through the process described in the paragraph above. We also require the authorized agent to submit proof that you have authorized them to act on your behalf.

International Privacy Notice

1607 Capital Partners, LLC and its affiliates (hereinafter “1607,” “we,” “our” or “us”), are committed to respecting the privacy of individuals, including its clients, prospective clients (“Prospects”), webinar attendees, and website visitors. Please note this website is not intended for non-US persons.

This Privacy Notice (the “Notice”) documents and explains how we collect and process personal data in connection with our website, electronic and other communications, and provides a general overview of how we process client personal data in the absence of any specific privacy language in a particular client agreement. Your client agreement may modify the terms of this Notice with respect to the servicing of your account.

For the purposes of applicable data protection law, we, or our UK affiliate, are the “data controller,” or, in circumstances where we partner with one or more other firms to process data, a “joint controller” of your personal data. Where we act as a joint controller, we will provide you with relevant information about our partner joint controllers.

We have appointed:

1607 Capital Partners Limited – FCA Reference Number 829462, located at 3 Shortlands, Hammersmith London W6 8DA acts as our UK representative for UK Data Protection Act matters.

We may collect and process the following personal data:

Information you give us:

- If you inquire about our capabilities or services for yourself or your employee, we will process personal data to facilitate our responses. Personal data processed may include: your name, gender, address, personal or professional e-mail address and personal or professional phone number, financial information, personal description, photograph, ID documentation (including your passport or ID card), professional activity, marital status, and information about your dependents or beneficiaries.
- You and/or your employer may give us information about you during our due diligence of your employer, when you complete a form on our site or by corresponding with us by phone, e-mail or other electronic means, or in writing. This includes information you provide when you make enquiries, submit information or content to our site, when you report a problem with our site or ask information via our site – including your name, email address, gender, professional activity postal address, telephone and fax.
- If you are interested in participating in events organized by us to support our commercial activities, then we may process your personal data – including but not limited to your name, gender, address, personal or professional e-mail address.
- When you are a client, your client agreement may contain additional provisions with respect to our use of your Personal Data.

Information we collect about you:

With regard to each of your visits to our site we may automatically collect the following information:

- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products, services or issues you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call us.
- Note that even where a client agreement restricts processing of your personal data, your use of our website is governed by the terms of this Notice.

Information we receive from other sources:

- We may also receive information about you if you use our investor web portal or engage with either our UK or US entities.
- We work closely with third parties (for example, banks and other financial institutions, business partners, legal or other consultants, sub-contractors in technical, analytics providers, search information providers,) and may receive information about you from them.

Information about other people:

If you provide information to us about any person other than yourself, such as other employees of your employer, or persons accompanying you to any events organized by us to support our commercial activities, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

Purposes and Legal Basis for processing

We may ask you for consent to collect or process your personal data on certain occasions, for example, and as stated below, where necessary in order to contact you with information about products and services or events that might be of interest to you or your employer.

We process your personal data when we need to do this to fulfil a contract with you, including processing your personal data to give effect to your investment in one of our or our affiliates' funds or products, to verify your identity, or to otherwise provide services to you.

We process your personal data when required by law to do so, such as if we receive a request from law enforcement or other government officials.

Where necessary, we process your personal data when it is in our legitimate interests to do this and when these interests are not overridden by your data protection rights. We have reviewed the data processing we carry out on the basis of our legitimate interests, which we have described above. You can obtain further information by contacting us using the details set forth above.

In particular:

- We use your personal data in order to effectively administer our funds, products, services, and our business;
- We use your personal data to undertake commercial and legal due diligence on our clients and investors, in order to assess their activities and condition in relation to their investments and the provision of our services;
- We monitor use of our websites, and use your personal data to help us monitor, improve and protect our services and websites, both online and offline;
- We monitor investor accounts to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law; and
- We will use personal data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation).
- We use your personal data or the personal data of the persons accompanying you in connection with the organization of social and entertainment physical or digital event to support our commercial activities.

Disclosure of Your Personal Data

We may share your personal data within our firm and trusted third-party processors in accordance with applicable data protection law.

Personal data will also be shared between us, as manager of certain funds, and the fund legal entities which are normally special purpose legal entities created in particular jurisdictions.

Depending upon the nature of your enquiry, we may share your personal data with affiliates in other countries if your enquiry relates to specific products or services offered by affiliates outside our country. All transfers are in accordance with the cross-border transfer information discussed below.

Aggregated data may also be shared within our firm for business purposes, including risk management and statistical purposes.

We may also share your personal data with trusted third parties including:

- Legal or other advisers, consultants and other professional experts, complainants, correspondents and enquirers, and suppliers and service providers of any of the above, and each of their associated businesses.
- Business partners, suppliers, and sub-contractors where these third parties process your personal data on our behalf. We take reasonable steps, including contractual obligations, to ensure that these third parties protect your personal data in accordance with our standards and in compliance with applicable data protection laws; and
- Analytics and search engine providers that assist us in the improvement and optimization of our website.

We may disclose your personal data to third parties:

- If we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- If we, our business, or our assets are acquired by a third party, in which case personal data held by it about its users, suppliers, or customers will be one of the transferred assets;
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce agreements; or if we reasonably consider this necessary; or to protect the rights, property, or safety of ourselves, our users, our customers, or others;
- We may disclose of the existence of a client relationship between you (entity name only) and us on a representative client list used in one-on-one marketing presentations (you may opt out of inclusion on this list); and
- For the purposes of crime prevention and fraud protection.

We use many different vendors for processing data, including Personal Data. These include:

- Cloud Providers
- Customer Relationship Management Software
- Data Storage
- Trustees and Administrators

- Security and Networking Vendors
- Accounting and Legal Services

These vendors may be located in more than one country, including but not limited to, the United States and the United Kingdom.

Marketing Communications

We, or trusted third parties on our behalf, may contact you by email or other electronic means or post with information about products, services and events that might be of interest to you. Where necessary, at the time that you provide your personal data to us, you will be given the opportunity to indicate whether or not you are happy for us to use your personal data in order to tell you about such products or services or events.

You can unsubscribe from this at any time by emailing us using the contact details provided below or in any marketing communications.

Where We Store Your Personal Data and How We Protect it

Certain affiliates and third-party service providers with whom we share personal data (as described above) may be located in countries different from ours and the country in which the data was collected (i.e., your country).

When we transfer personal data outside the country in which it was collected, we comply with all applicable data protection requirements, include the use of consent, contractual provisions, and/or data sharing arrangements that comply with local law. In order to provide adequate protection for these transfers (where applicable), we utilize transfer mechanisms recognized by your home country, which may include executing appropriate contractual clauses based on and conforming to the EU/UK model clauses. To obtain a copy of the transfer mechanism, please contact us using the details provided below.

While we take reasonable steps to protect your personal data from loss or destruction, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our site; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorized access.

Your Rights

You have various rights with respect to our use of your personal data:

- **Access:** You have the right to request a copy of the personal data that we hold about you. Please note that there are exceptions to this right, so that access may be denied if, for example, making the information available to you would reveal personal data about another person, or if we are legally prevented from disclosing such information. You are entitled to see the personal data held about you. If you wish to do this, please contact us using the contact details provided below.

- **Accuracy:** We aim to keep your personal data accurate, current, and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date.
- **Objecting:** In certain circumstances, you also have the right to object to processing of your personal data and to ask us to block, erase and restrict your personal data. If you would like us to stop using your personal data, please contact us using the contact details provided below.
- **Porting:** You have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format.
- **Complaints:** If you believe that your data protection rights may have been breached, you have the right to lodge a complaint with the applicable supervisory authority or to seek a remedy through the courts.

Please note that there are exceptions to these rights, if, for example, we are under a legal obligation to continue to process your personal data.

When we ask you to supply us with personal data we will attempt to make it clear whether the personal data we are asking for must be supplied so that we can provide the products and services to you or your employer, or whether the supply of any personal data we ask for is optional.

How Long We Keep Your Personal Data

We will retain your personal data for as long as we believe it is necessary or desirable to fulfil our business purposes or to comply with applicable law, audit requirements, regulatory requests or orders from competent courts.

Personal data collected will be retained pursuant to our record retention policy, and in most instances will not be retained longer than seven (7) years from the date of last use.

Changes to our Privacy Notice

Any changes we may make to our Notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Policy.

Contact Details

If you wish to exercise any of your legal rights, please contact: clientservice@1607capital.com

Data Protection Authorities

After contacting us about Data Processing issues, you have the right to appeal to your local Data Protection Authority. Depending on your location, your local Data Protection Authority will respond to issues or complaints about the Processing of your Personal Data. These may include:

United Kingdom

[The United Kingdom's Information Commissioner's Office](#)