## PRIVACY NOTICE FOR CONSUMERS

EFFECTIVE DATE: January 1, 2026

As may be required under the Gramm-Leach-Bliley Act and its implementing regulations, as applicable, the purpose of this notice is to inform clients who have invested in third-party investment funds or other third-party collective investment vehicles ("third-party products") distributed by Citigroup Inc. and its affiliates (collectively, "Citi") of Citi's policies and practices with respect to how we handle, protect and limit the use of nonpublic personal information that we collect and maintain in connection with your investments in third-party products. The security of personal information about you is our priority. To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

We train our employees in the proper handling of personal information. When we use other companies to provide services for us, we require them to protect the confidentiality of personal information they receive.

In connection with Citi's distribution of third-party products, we collect and maintain personal information, including non-public personal information, about you from the following sources:

- (i) Information received from you on subscription documents, investor questionnaires and other forms;
- (ii) Information about your transactions with us and our affiliates;
- (iii) Information we receive about you from other sources, including unaffiliated third parties; and
- (iv) Information we receive about you from consumer reporting agencies.

Personal information that we collect generally will include, but is not necessarily limited to:

- (i) Contact information (e.g., name, address, phone, fax, email);
- (ii) Identification information (e.g., Social Security number, passport or driver's license number, other government-issued identification);
- (iii) Professional information (e.g., employer, role or title, business address); and
- (iv) Financial information (e.g., financial account numbers).

We will use such personal information for everyday business purposes, such as to process transactions, maintain accounts, respond to court orders and legal investigations, and otherwise as may be disclosed in the offering materials provided to you and the agreements you enter into in respect of the third-party products offered to you.

Whether you are a current or former investor in third-party products, we will not disclose personal information about you except (i) to our employees and affiliates on a need to know basis, which includes personnel who need to know such information for the purposes of complying with applicable anti-money laundering laws and customer identification requirements, and (ii) to sponsors of third-party products, their advisers and service providers, as may be necessary to facilitate or maintain your investments into such third-party products, including as may be required to satisfy any legal, regulatory or compliance requirements of such persons. Your personal information, once disclosed to sponsors of third-party products, their advisers and service providers or otherwise to facilitate your investment into such third-party products, is not subject to the control of Citi, and Citi accepts no responsibility for the use or misuse of such information by such persons. You should carefully review all offering materials with respect to such third-party products and your rights and obligations thereunder.

Your personal information may also be subject to disclosure to the following third parties:

- (i) financial service providers, non-financial companies, and other service providers or other nonaffiliated companies in connection with services provided to Citi, such as those provided by any administrators, auditors, tax advisers, legal advisers or other Citi service providers; and
- (ii) government agencies, regulatory authorities, courts and the like as necessary, required or advisable.

In each such case, Citi's disclosure of any of your non-public personal information will be subject to customary undertakings of confidentiality. We do not sell your personal information.

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

Categories of Personal Information and Sensitive Personal Information We Collect: We have collected some or all of the following categories of personal information from individuals within the last twelve (12) months:

- <u>Identifiers</u>, such as name, contact details and address (including physical address, email address and Internet Protocol address), and other identification (including social security number, passport number and drivers' license or state identification card number);
- Other customer records, such as telephone number, signature, bank account number, other financial information (including accounts and transactions with other institutions and anti-money laundering information), and verification documentation and

- information regarding investors' status under various laws and regulations (including social security number, tax status, income and assets);
- <u>Protected classification characteristics under California or federal law</u>, such as date of birth, citizenship and birthplace;
- Commercial information, such as account data and other information contained in any document provided by investors to authorized service providers (whether directly or indirectly), risk tolerance, transaction history, investment experience and investment activity, information regarding a potential and/or actual investment in the applicable fund(s), including ownership percentage, capital investment, income and losses, source of funds used to make the investment in the applicable fund(s); and
- <u>Internet or other electronic network activity information</u>, such as information regarding your use of our website, client portal or mobile app (e.g., cookies, browsing history and/or search history), as well as information you provide to us when you correspond with us in relation to inquiries.

Within the last twelve (12) months, for a business purpose, we have shared each of the categories of personal information and sensitive personal information collected with affiliates and third-party service providers as set forth in "Disclosure of Information" in the Privacy Notice above, and we collect personal information from the sources set forth in "Sources of Non-Public Information" in the Privacy Notice above. We do not collect or process Sensitive Personal Information for the purpose of inferring characteristics about a consumer.

Purposes for Collecting Personal Information and Sensitive 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 and have not sold within the last 12 months any of the personal information and sensitive personal information we collect about you to anyone.

We do not knowingly sell or share the personal information of consumers under 16 years of age.

Deletion Rights: You have the right to request that we delete any of your personal information that we retain, subject to certain exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations. We shall retain your personal information and sensitive personal information for as long as is needed to provide our services to you and then thereafter only to comply with applicable laws that require data retention, such as the SEC's data retention rules.

Disclosure and Access Rights: You have the right to request that we disclose to you certain information regarding our collection, use, disclosure and sale 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, selling or sharing 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.

Limiting Selling or Sharing: Since we do not sell your personal information, we are not required to provide an opt-out mechanism for that purpose. In addition, we do not share your personal information in a way that would require us to provide you an opt-out mechanism for that purpose.

No Discrimination: We will not discriminate or retaliate against you for exercising your rights under the CCPA and CPRA, 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.

Correction Rights: You have the right to request that we correct your personal information if it is inaccurate. We shall use commercially reasonable efforts to correct personal information upon receiving a verifiable consumer request.

How to Exercise Your Rights: To exercise any of your rights under the CCPA and CPRA, or to access this notice in an alternative format, please submit a request using any of the methods set forth below.

Contact the Consumer Privacy Team (CPT) using the following number: 1-833-981-0270 (TTY:711).

Submit a request online by visiting Citi's Global Privacy Hub available here: <a href="https://online.citi.com/US/ag/dataprivacyhub/home">https://online.citi.com/US/ag/dataprivacyhub/home</a>

We will contact you to confirm receipt of your request under the CCPA and request any additional information necessary to verify your request. We verify requests by matching information provided in connection with your request to information contained in our records. Depending on the sensitivity of the request and the varying levels of risk in responding to such requests (for example, the risk of responding to fraudulent or malicious requests), we may request your investor portal access credentials in order to verify your request. You may designate an authorized agent to make a request under the CCPA on your behalf, provided that you provide a signed agreement verifying such authorized agent's authority to make requests on your behalf, and we may verify such authorized person's identity using the procedures above.

Our goal is to respond to any verifiable consumer request within forty-five (45) days of our receipt of such request. We will inform you in writing if we cannot meet that timeline. For additional information and any questions, natural persons resident in California are invited to visit Citi's Global Privacy Hub at <a href="https://online.citi.com/US/ag/dataprivacyhub/home">https://online.citi.com/US/ag/dataprivacyhub/home</a> or call us at (833) 981-0270 (TTY: 711).

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