PRIVACY NOTICE FOR CONSUMERS

EFFECTIVE DATE: January 1, 2020

As may be required under the Gramm-Leach-Bliley Act and its implementing regulations, as applicable, the purpose of this notice is to inform you of our policies and practices with respect to how we handle, protect and limit the use of nonpublic personal information that we collect and maintain in order to service and administer your business with one or more collective investment vehicles (each, a “Fund,” and your investment therein, an “Interest”) for which Citi Private Advisory, LLC (“CPA”) serves as investment adviser and certain affiliates of CPA provide distribution and/or other services (collectively, “Citi”).

Our goal is to maintain your trust and confidence when handling personal information about you.

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 the formation and ongoing activities of the Funds, 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 in accordance with the agreements governing your investment in the Interests.

Whether you are a current or former investor, we will not disclose personal information about you except 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.

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 one or more Funds, such as those
provided by any administrators, auditors, tax advisers, legal advisers or other Fund service providers;

(ii) non-affiliated investment funds or other collective investment vehicles, their advisers and service providers, as may be necessary to facilitate or maintain the investments of one or more Funds into such entities, including as may be required to satisfy any legal, regulatory or compliance requirements of such persons; and

(iii) government agencies, regulatory authorities, courts and the like as necessary, required or advisable.

In each such case, the Funds’ 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. Personal information you provide to a Fund in connection with your subscription for an Interest may include information subject to the California Consumer Privacy Act of 2018. You may request copies of the materials you provided with respect to your subscription for an Interest by contacting your financial adviser or your private banker. Personal information provided in such documents is maintained in its original format and not incorporated into or used to update information maintained by Citi. For additional information with respect to personal information maintained by Citi, natural persons resident in California are invited to visit Citi’s Global Privacy Hub at https://online.citi.com/dataprivacyhub or call us at (833) 971-1191.

This notice applies only with respect to your investments in Interests. You may also receive other privacy notices from Citigroup, Inc. and/or one of its affiliates in connection with your other account activities.

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