

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 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.

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 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. Personal information you provide to Citi in connection with your investment in third-party products may include information subject to the California Consumer Privacy Act of 2018. You may request copies of the materials you provided to Citi with respect to your investment in third-party products 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 the distribution activities of Citi in respect of third-party products. You may also receive other privacy notices from Citi in connection with your other account activities or from the sponsors of such third-party products.
