

HUMPHREYS

PRIVACY POLICY

We are committed to keeping the personal information collected from our potential, current, and former investors confidential and secure. The proper handling of personal information is one of our highest priorities. We want to ensure you know why we need to collect personal information from you. We also want to explain to you our commitment to protect the information you provide to us.

Investor Information

We collect and keep only information that we deem necessary for us to evaluate your eligibility to invest in one or more of our funds and provide other services in connection with your investment in the fund. We may collect Non-public Personal Information from you.

Upon completion of subscription documents, data gathering forms, or other forms. This includes information such as name, address, tax identification number or social security number, assets, income, net worth, copies of financial documents, and other information deemed necessary to evaluate your eligibility to invest in one or more of our funds or as is required by law.

As a result of transactions with us, our affiliates, or others. This could include information received in connection with transactions completed with us or information received from outside vendors used to complete transactions or to effect financial goals.

Sharing Information

We only share your Non-public Personal Information (i) with non-affiliated companies or individuals as permitted by law, such as your representative within our firm, affiliated securities firm, third-party service providers, and other product vendors, or (ii) to comply with legal or regulatory requirements. With your approval, we also may share information with your advisors, which can include your accountant and/or attorney. In the normal course of our business, we may disclose information we collect about you to regulators, unaffiliated companies, financial institutions, or individuals that contract with us to perform servicing functions such as:

- Record keeping
- Computer related services
- Good faith disclosure to regulators who have regulatory authority over the company
- Companies we hire to provide support services are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We attempt to limit their use of your personal information to the performance of the specific service we have requested.

We do not provide your nonpublic personally identifiable information to mailing list vendors or solicitors for any purpose.

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When we provide personal information to a service provider, we expect that these providers will safeguard your information, use the information only for the intended purpose, and abide by applicable law.

Additional Privacy Notice

The Company also may collect and use your personal information in connection with providing its investor portal and other Online Services. This includes information we collect from you, such as when you register for online access and provide identifiers or contact information; information we collect automatically, including through the use of cookies and other Internet technologies; and information we collect from others, including publicly and commercially available sources.

We use this information for various business purposes, including:

- To provide you with information, products, and services, including to manage accounts, provide troubleshooting, for data analytics, and otherwise to administer our services;
- To communicate with you, including to provide you with relevant marketing and other content;
- To keep our services, businesses, and investors safe and secure, to comply with laws and regulations, and to protect our exercise of our legal rights or defend against legal claims where legally required or where we have obtained your consent.

We may share your information in the various ways described above. In addition, we may share information in a form that does not identify you, such as aggregated data. Such data is not subject to this Notice.

European Residents

If your personal information is protected by EU data protection law, you may have certain rights in respect of your information, such as a right of access, rectification, restriction, opposition, portability, and deletion, subject to limitations in applicable law. To exercise your right, please contact us at the address below. You may also have a right to lodge a complaint with the competent Supervisory Authority for data protection in your country. Humphreys Capital is based in the U.S., and your information will thus be processed in the U.S., where the level of protection may not be the same as in your country. The transfer is necessary to perform our agreement with you. Your personal information will be retained for as long as necessary to perform our services and to meet our legal obligations.

California Residents

If your personal information is protected by the California Consumer Privacy Act (CCPA), you may have certain rights with respect to your information, such as a right to additional transparency and access to the specific pieces of personal information that Humphreys Capital has collected about you. You also may have the right to submit a request for deletion of information under certain circumstances. To exercise your right, please contact us at the email address or phone number below. Once we receive your request, we may verify it by

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requesting information to confirm your identity, including by asking you for additional information. If you would like to use an agent registered with the California Secretary of State to exercise your rights, We may request evidence that you have provided such agent with power of attorney or that the agent otherwise has valid written authority to submit requests to exercise rights on your behalf. Subject to applicable law, you may have a right not to be discriminated against for exercising your rights over your personal information. Humphreys Capital does not sell such personal information.

Other Jurisdictions

As privacy laws are constantly changing in the United States and in other foreign jurisdictions, your personal information may be protected by other applicable regulations. Humphreys Capital seeks to comply with all applicable legal regulations to which it is subject. If you have questions regarding applicable privacy regulations based on your jurisdiction, please consult with legal counsel.

Employee Access to Information

Only employees with a valid business reason have access to your 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

We maintain security standards to protect your information, whether written, spoken, or electronic. We update and test our systems to ensure the protection and integrity of information.

Maintaining Accurate Information

Our goal is to maintain accurate, up-to-date investor records in accordance with industry standards. When you or any other investor provide us with updated information, we will endeavor to update our records as soon as possible. We do not, however, have a duty to inquire as to changes in the information you provide to us.

E-Mail

Should you send us your questions and comments via e-mail, we will share your correspondence with those employees or agents most capable of addressing your questions and concerns. We will retain your communication until we have done our very best to provide you with a complete and satisfactory response. Ultimately, we will either discard your communication or archive it according to the requirements under applicable securities laws

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If you have given us an appropriate form of consent as prescribed by the applicable governmental authorities, we may send certain disclosures to you, including Schedule K-1s, via encrypted e-mail in accordance with applicable regulatory guidance.

Please note that unless we expressly advise you otherwise, our e-mail facilities do not provide a means for completely secure and private communications between you and us. Although every attempt will be made to keep your information confidential, there are risks associated with electronic communication. For that reason, please consider appropriate precautionary measures when using email to communicate information to us that you consider to be confidential. If you wish, you may contact us instead via telephone or by mail. Disclosure of our Privacy Policy: We recognize and respect the privacy concerns of our potential, current, and former investors. We are committed to safeguarding this information. As a member of the financial services industry, we are sending you this Notice of Privacy Policy for informational purposes and will update and distribute it as required by law. It is also available to you upon request.

If you have any questions about our privacy policy, please contact the CCO at compliance@humphreyscapital.com or toll-free at 1-833-902-1001, because your privacy and the confidentiality of your information are very important to us.