

Privacy Notice

Buchanan Street Partners, L.P.

Updated March 1, 2019

WHAT YOU SHOULD KNOW

At Buchanan Street Partners, L.P. (“BSP”), we recognize the importance of keeping information about you secure and confidential. We do not sell your nonpublic personal and financial information.

We carefully manage information among our affiliated group of companies to safeguard your privacy and to provide you with consistently excellent service.

We are providing this notice to you to comply with the requirements of Regulation S-P, “Privacy of Consumer Financial Information,” issued by the United States Securities and Exchange Commission.

OUR PRIVACY POLICY

We, BSP, are committed to protecting the nonpublic personal and financial information of our customers and consumers who obtain or seek to obtain financial products or services primarily for personal, family, or household purposes. We fulfill our commitment by establishing and implementing policies and systems to protect the security and confidentiality of this information.

In our offices, we limit access to nonpublic personal and financial information about you to those BSP personnel who need to know the information in order to provide products or services to you. We maintain physical, electronic, and procedural safeguards to protect your nonpublic personal and financial information.

CATEGORIES OF INFORMATION WE COLLECT

We may collect the following types of nonpublic personal and financial information about you from the following sources:

- Your social security number, name, address, and other personal and financial information, from you and from identification cards and papers you submit to us on applications, subscription agreements, or other forms of communications.
- Information about your account balances and financial investments with us, our affiliated entities, or non-affiliated third parties, from our internal sources, from our affiliated entities, and from non-affiliated third parties.
- Information about your account balances and financial investments and other personal and financial information, from consumer credit reporting agencies or other non-affiliated third parties, to verify information received from you or others.

CATEGORIES OF INFORMATION WE DISCLOSE TO NON-AFFILIATED THIRD PARTIES

- We may disclose your name, address, and account and other identifying numbers, as well as information about your pending or past transactions and other personal financial information to non-affiliated third parties for our everyday business purposes such as necessary to administer and service your account and commingled investment vehicles in which you are invested, to market our products and services through joint marketing arrangements, or to respond to court orders and legal investigations.

- We may disclose nonpublic personal and financial information concerning you to law enforcement agencies, federal regulatory agencies, self-regulatory organizations or other non-affiliated third parties, if required or requested to do so by a court order, judicial subpoena, or regulatory inquiry.
- We do not otherwise disclose your nonpublic personal and financial information to non-affiliated third parties, except where we believe in good faith that disclosure is required or permitted by law.

CATEGORIES OF INFORMATION WE DISCLOSE TO OUR AFFILIATED ENTITIES

- We regularly disclose your name, address, and account and other identifying numbers, account balances and information about your pending or past investments to our affiliates to execute, process and confirm financial transactions for you, to administer and service your account and commingled investment vehicles in which you are invested, or to market our products and services to you.

INFORMATION ABOUT FORMER CUSTOMERS

We do not disclose nonpublic personal and financial information about former customers to non-affiliated 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. When you are no longer our customer, we continue to disclose your information as described in this notice.

REMINDER ABOUT BSP'S FINANCIAL PRODUCTS

Financial products offered by Buchanan Street Partners:

- Are not guaranteed by a bank;
- Are not obligations of Buchanan Street Partners;
- Are not insured by the Federal Deposit Insurance Corporation; and
- Are subject to investment risks, including possible loss of the principal amount committed or invested, and earnings thereon.

QUESTIONS

Should you have any questions about our Privacy Notice, please contact us by e-mail or by regular mail at the address below.

Buchanan Street Partners

Attention: Chief Compliance Officer

3501 Jamboree Road, Suite 4200

Newport Beach, CA 92660

e-mail: cmacdonald@buchananstreet.com