

# ALTERA PRIVATE ACCESS, LLC

## PRIVACY NOTICE

Altera Private Access, LLC, and its affiliates, understand the importance of maintaining the confidentiality and security of our clients' and investors' personal information. In this Privacy Notice, "we", "us", and "our" refers collectively to Altera Private Access, LLC and its or their affiliates and/or delegates (together "Altera") and investment funds managed, advised, or administered by Altera (each, a "Fund"). This notice describes the privacy practices of Altera globally and aims to provide transparent information, in accordance with privacy laws.

The following describes information we collect about you, with whom we share your information, how we safeguard your information, and how you can contact us regarding our privacy notice and practices or to exercise your rights. Altera does not sell your personal information.

### Security and Safeguarding of Personal Information

We have policies and procedures reasonably designed to safeguard the confidentiality and security of personal information that includes restricting access to nonpublic personal information to properly authorized persons and maintaining generally accepted physical, electronic, and procedural safeguards. 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. However, although we will do our best to protect your personal data, we cannot totally guarantee the security of your data.

### Information We Collect & How We Collect It

All financial companies need to share personal information to run their everyday business. We collect various elements of public and nonpublic personal information from a variety of sources including:

- Information we receive about you on applications and other forms including subscription documents, questionnaires, and online registration forms, whether we receive the form in writing or electronically. This information may include your name, address, telephone number, e-mail address, tax identification number, income and other financial data, investment experience, bank account information, contact details, corporate contact information, passport number, CRD/IARD number, corporate documents, and trust agreements.
- Information about transactions with us, our affiliates and non-affiliated third parties (as further detailed below), which can include account balances and transactions history;
- Communications with Altera, including but not limited to telephone calls and e-mails to provide you with requested information;
- Information from online forms you complete and data we receive when you visit one of our websites (such as internet protocol address, browser software). Information relating to the usage of our website is collected using cookies. These are text files placed on your computer to collect standard internet log information and visitor behavior information. We use your information collected from the website to personalize your repeat visits to the site. Additionally we use cookies to track visitor use of the website and to compile statistical reports on website activity. For further information visit <http://www.allaboutcookies.org/>.
- Commercial information, including tax information, bank account details, source of funds details, investment preferences and strategies, and details related to your investment activity
- Internet or other electronic network activity information, including, but not limited to , browsing history, search history, and information regarding a consumer's interaction with an internet website, application, or advertisement.
- Visual information, including your signature
- Professional or employment-related information including your employment, employer's name, and income.
- Inferences that we draw from your personal information to create a profile about your preferences

### We collect this Personal Data in various ways, including:

- Directly from the Data Subject: You provide us with Personal Data through various interactions, including, but not limited to, investment in the Fund, subscription documents (whether past, present, or future), and recoding of electronic communications.
- Indirectly from other sources: We may also obtain Personal Data from other public sources, such as public records and the Internet.
- Automatic website collection tools: As with most websites, we automatically collect certain data from Data Subjects who visit the Site. To this end, we use data collection tools ("Cookies") on the Site to records certain

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usage information, such as the number and frequency of visitors to the Site. This information may include the websites that you access immediately before and after your visit to our Site, and which Internet browser you are using.

## How We Use Personal Data

We use Personal Data for a variety of reasonable and legitimate business purposes, including, but not limited to, the following:

- Where it is necessary for the performance of our rights and obligations under the Subscription Agreement and/or the constitutional and operational documents of the Fund, such as managing and administering holdings, including assessing and processing subscriptions and withdrawals/redemptions, communicating with Investors about holdings and account related activities on an on-going basis, and updating and maintaining records and provide accounting records;
- Where it is necessary for compliance with a legal and regulatory obligation to which the Fund is subject, such as compliance with anti-money laundering and FATCA/CRS requirements, and otherwise to screen transactions for fraud prevention, anti-money laundering purposes, and the prevention of crime and the reporting of appropriate tax-related information to tax authorities;
- To perform financial and regulatory accounting and reporting;
- To manage and maintain relationships and for ongoing client servicing;
- For quality, regulatory compliance, business analysis, training and related purposes, consistent with our legitimate interests, in the monitoring and recording of calls and other communications;
- For other purposes with the consent of the data subject where necessary; and/or
- For our other legal, personnel, administrative and management purposes, including where it is necessary for purpose of our legitimate interests and such interests are not overridden by your interests, fundamental rights, or freedoms.

Reasons We Can Share Your Personal Information	Does Altera Private Access Share?	Can You Limit This Sharing?
For our everyday business purposes, such as to process transactions, maintain partnership accounts, respond to court orders and legal investigations, or report to credit bureaus.	Yes	No
For our marketing purposes to offer our products and services	Yes	No
For joint marketing with other financial companies.	Yes	No
For our affiliates' everyday business purposes – information about your transactions and experiences. We may share information about our clients to process transactions, maintain partnership accounts, or respond to court orders and legal investigations.	Yes	No
For our affiliates' everyday business purposes – information about your creditworthiness.	No	No
For non-affiliates to market to you – to offer new products or services to you.	Yes	Yes
For non-affiliates to market to you – we do not sell, share, or disclose your nonpublic personal information to non-affiliated third-party marketing companies.	No	No

## How We Disclose Your Information to Third Parties and On What Basis

We disclose personal information that we collect, as described above, to non-affiliated third parties under the circumstances described below and, in this notice, to carry out and implement any and all purposes and objects of the Fund, including:

- With the Fund's data processors or service providers (the "Delegates"), such as the Fund's accountants, attorneys, consultants, liquidity providers, and other professionals, which may use Personal Data, for example to provide its services to the Fund or to discharge the legal or regulatory requirements that apply directly to it or in respect of which the Fund and/or the General Partner relies upon the Delegates. Such use of Personal Data by a
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Delegate will always be compatible with at least one of the aforementioned purposes for which we process Personal Data. The Delegates shall not retain, use, sell or otherwise disclose Personal Data for any purpose other than the specific business purpose for which the Fund has provided the information to the Delegate or as required by law.

- With regulatory, administrative, law enforcement agencies, ombudsmen or other oversight bodies in certain circumstances where we and/or our Delegates are legally obliged or it is in our legal interests to share Personal Data and other information with respect to your interest in the Fund with the relevant regulatory authorities such as the Cayman Islands Monetary Authority or, the Tax Information Authority and the U.S. Securities and Exchange Commission. They, in turn, may exchange this information with foreign authorities, including tax authorities.
- With investment managers, who are responsible for managing the underlying assets for the Fund;
- With a third party that acquires, or is interested in acquiring, all or a substantial part of our assets or equity interests, or that succeeds the Investment Manager or General Partner in carrying on all or a part of our business.
- As required by law or regulation, including to comply with a subpoena or similar legal process, including when we believe in good faith that disclosure is legally required.
- Where necessary to protect the Investment Manager, the General Partner, or the Fund's rights and property.

## Retention of Data

During the course of our relationship with you, we'll retain personal data which is necessary to provide services to you. We will take all reasonable steps to keep your personal data up to date throughout our relationship. Additionally, we are subject to regulatory requirements requiring us to retain your data for a specified minimum period, which is generally five years from the date you cease being our customer. This minimum period is the period during which we have a legal obligation to retain your records. Additionally, we reserve the right to retain data for a longer period where we believe it is in our legitimate interests to do so. In any case, we will not keep your personal data for longer than seven years after our relationship with you has ended.

You have the right to request deletion of your personal data. We'll comply with this request, subject to the restrictions of our regulatory obligations and legitimate interests as noted above.

We maintain books and records for a 5-year period upon closing of any Fund. Altera is subject to extensive recordkeeping requirements. The requirements are driven by laws and regulations based on the jurisdictions in which we are located and the regulated businesses we operate. In addition to delineating the types of records that must be maintained, the various regulations also address the periods of time for which they must be kept and, in some cases, establish specific protocols for how, and in what form, those records may be maintained.

It is Altera's policy to maintain books and records for periods of time sufficient to meet its needs in accordance with operational, contractual, legal, regulatory, tax, audit and/or historical requirements, with respect to the purposes for which the personal data are obtained and processed.

## **For Citizens of the European Union – How You Can Access Information We Hold About You**

You have the right to request a copy of the information that we hold about you. If you would like a copy of some or all of your personal information, please contact us using the contact details noted below. When your personal data is processed by automated methods you have the right to ask us to move your personal data to another organization for their use.

## Contact Information

Phone: 404-537-2759  
Mail: 10 Glenlake Pkwy NE  
North Tower Suite 1070  
Atlanta, GA 30328  
Email: [investor-relations@alteraprivate.com](mailto:investor-relations@alteraprivate.com)

## Changes to Our Privacy Policy

Any changes we make to this policy in the future will be posted on our website and an updated version of this Privacy Notice will be provided to you so that you are always aware of how we use your Personal Data.

<b>Definitions</b>	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. Affiliated entities: Capital Investment Advisors; Wela Strategies; Capital Accounting & Tax; Capital Administration; Altera Investments, LLC; CAP GP Holdings, LLC.
Non-Affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. This may include banks, credit unions, or other financial institutions with which we have a joint marketing agreement.

## **Other Important Information**

### **Website**

Our website contains links to other websites. This privacy policy only applies to our website. Therefore, when you link to other websites you should read their privacy policies and our privacy policy does not extend to any other vendor, company, or third party linked to from our website.

### **Information for California, North Dakota, and Vermont Clients**

In response to applicable state law, if the mailing address provided for your account is in California, North Dakota, or Vermont, we will automatically treat your account as if you do not want us to disclose your personal information to non-affiliated third parties for purposes of them marketing to you, except as permitted by the applicable state law.

### **Information for New Jersey Clients**

The New Jersey Bureau of Securities ("Bureau"), an arm of the Office of the New Jersey Attorney General, is charged with protecting investors from investment fraud, and regulating the securities industry in New Jersey.

In addition to bringing investigative and enforcement actions against firms or individuals who violate the New Jersey Uniform Securities Law and regulations thereunder, the Bureau registers securities offered or sold in New Jersey and oversees the firms and individuals selling securities or providing investment advice to or from New Jersey.

Investors can contact the Bureau to research the professional background of current and former registered broker-dealers, investment advisers, agents, and investment adviser representatives. To research a financial professional, contact the Bureau via phone at 1-866-1-Invest (within New Jersey) or at 973-504-3600 (both within and outside New Jersey) or via email at [njbos@lps.state.nj.us](mailto:njbos@lps.state.nj.us).

Investors can also file complaints with the Bureau against individuals and firms selling securities or offering investment advice, as well as companies issuing securities investments directly.

To file a complaint or learn more about the Bureau, visit the Bureau's website at [www.NJSecurities.gov](http://www.NJSecurities.gov).