

ANNUAL PRIVACY NOTICE

This U.S. Privacy Notice describes the policies of Contour Asset Management, LLC (“Contour”) with respect to the non-public personal information (“Information”) of its clients, prospective clients, and former clients (the “Clients”) and investors, prospective investors, and former investors (collectively, with the Clients, the “Investors”) in the funds (the “Funds”) to which Contour provides investment advisory services. These policies apply to individuals only.

If you are a California resident, please review the below **California Specific Privacy Policy** for additional disclosures, our **Notice at Collection**, and a description of your rights under the California Consumer Privacy Act (with any implementing regulations and as may be amended from time to time).

<p>Personal information collected</p>	<p>In the course of its investment advisory services, Contour receives and maintains nonpublic personal information about Investors including, but not limited to, the below listed types of Information. Contour has collected the following categories of personal information from Investors within the past twelve months:</p> <hr/> <p>Information in correspondence, subscription documents and other forms which Investors complete and submit to Contour. This includes (but is not limited to):</p> <ul style="list-style-type: none"> • names, • dates of birth, • email and physical addresses, • phone numbers, • signatures, • national identification number • nationality, citizenships • employment, and • commercial and financial and source of wealth information. <hr/> <ul style="list-style-type: none"> • Information relating to the value of an Investor’s interests in the Funds. <hr/> <ul style="list-style-type: none"> • Information relating to an Investor’s transactions with Contour and its affiliates, with and through the Funds, including subscriptions and redemptions. <hr/> <ul style="list-style-type: none"> • Information about the bank and brokerage accounts of an Investor received from such Investor’s purchaser representative, financial advisor, investment consultant or other financial institution with whom the Funds have a relationship and/or whom the Investor may have authorized to provide such Information to the Funds.
<p>Purpose for processing personal information</p>	<p>Contour may use or disclose the personal information it collects for one or more of the following purposes:</p> <ul style="list-style-type: none"> • To fulfill or meet the reason you provided the information. For example, if you share your name and contact information to ask a question about our services, we will use that personal information to respond to your inquiry. If you provide your personal information to purchase a service, we will use that information to provide that service to you. We may also save your information to facilitate future communications and services.

	<ul style="list-style-type: none"> • To identify and verify the Investor in the Funds • To comply with state and federal law and regulation, which include but are not limited to, Anti-Money Laundering and Know Your Customer checks for financial fraud prevention • To assist the Fund Administrator to administer and operate the Funds • To assist the Contour in its reporting obligations to Investors • To process your requests, transactions, and payments and prevent transactional fraud
<p>Disclosure of personal information</p>	<p>We may disclose your personal information to a third party for a business or commercial purpose. When we disclose personal information for a business or commercial purpose, we make efforts to ensure the recipient will both keep that personal information confidential and not use it for any purpose except performing the contract.</p> <p>For example, Contour may disclose Information about Investors as may be reasonably necessary or appropriate in connection with the management of client and investor accounts or as required by law or any applicable regulatory authority, such as to demonstrate compliance with state or federal laws or regulations, or as otherwise directed in writing by an Investor.</p> <p>Personal information may be shared with the following recipients:</p> <ul style="list-style-type: none"> • Third party service providers to the Funds, including fund administrators, accountants, auditors, and primer brokers. • Contour service providers such as attorneys, auditors, and other professionals. • Unaffiliated third parties who perform marketing services on behalf of the Funds or with whom Contour has entered into joint marketing agreements for services or information about services that you have requested, including placement agents and brokers. • Persons acting in a fiduciary or representative capacity on behalf of an individual investor, such as an IRA custodian, Financial Advisor, or Trustee of a grantor trust. • Government, legal regulatory or other authorities under applicable laws. <p>In the preceding twelve months, Contour has disclosed the personal information it collects listed above for a business or commercial purpose. In the preceding twelve months, Contour has not sold personal information.</p>
<p>Storage and security of personal information</p>	<p>Contour restricts access to Information about you to those of our employees and agents and representatives, who need to know the Information to enable us to provide our services to our Investors.</p> <p>Contour also maintains appropriate physical, electronic and procedural safeguards designed to protect Investor Information and to prevent unauthorized disclosure of such Information.</p> <p>When it is necessary for Contour to share your personal Information with other parties, Contour requires (i) that such parties agree to protect the confidentiality of that Information and (ii) that such Information be used solely for the limited</p>

	<p>purpose for which Contour discloses the Information to them. Contour will advise these parties not to further share your Information with others except to fulfill that limited purpose.</p>
<p>Investors' Privacy rights in relation to Personal Information</p>	<ul style="list-style-type: none"> • You may send requests for correction to: Alpa Rana, Chief Financial Officer and Chief Compliance Officer, who can be contacted at Privacy@contourasset.com or at +1 646 553 2490. • You may also request that we update or delete certain of your Information, subject to some conditions, by contacting us at Privacy@contourasset.com. We may ask you to verify your identity and to provide other details before we are able to provide you with any information, correct any inaccuracies, or delete any Information. Your right to delete your Information is subject to our records retention policies and applicable law. • You may also limit use of your Information to prevent Contour from sharing Information with non-affiliates who may use it to market to you. Currently, Contour does not share Information with any non-affiliates for this purpose. • You have the right to request access to the personal information we hold about you. • You have the right to data portability and to request the transmission of personal information about them to another organization • You have the right to object to automated decision making technology that materially impacts you. Contour does utilize this technology. • If Contour receives a request to delete your personal Information, Contour may be prevented from doing so if that personal Information is retained to meet legal or regulatory requirements. • You cannot limit the Information Contour shares to respond to court orders and legal investigations. It may be necessary, under anti-money laundering and similar laws, to disclose Information about Investors in order for the Funds to accept subscriptions from them. • If you exercise your privacy right, Contour will not discriminate against you.
<p>Opt In and Opt Out</p>	<p>You may have the right to opt in to or opt out of certain of our uses and disclosures of your Information. For example, when you are asked to provide Information, you may have the opportunity to elect to, or not to receive messages from us by e-mail. You may tell us that you do not want to receive our promotional messages, or that you do not want us to share your Information with third parties for their marketing purposes by sending us your name, address, e-mail, and phone number to:</p> <p>Alpa Rana, Chief Financial Officer and Chief Compliance Officer, can be contacted at Privacy@contourasset.com or at +1 646 553 2490.</p> <p>Please indicate whether you are asking us to stop sharing your Information with third parties, or if you are writing to request that you no longer receive a particular media notification from us. Please understand that it may take us a few days to process any opt out request and that even if you opt out of receiving promotional</p>

	correspondence from us, we may still contact you in connection with your relationship, activities, transactions, and communications with us. Also, to stop receiving promotional messages from third parties who already have your contact information, please contact them directly.
Amendments to Privacy policy	Contour will continue to follow privacy procedures relating to retention, handling, and dispositions of our records, including with respect to your Information. Contour reserves the right to modify this U.S. Privacy Policy at any time and without prior notice. We encourage you to review the most current Privacy Policy provided to you.
Questions?	If you have any questions in relation to this U.S. Privacy Policy, please contact: Contour Asset Management LLC 99 Park Avenue, Suite 1540 New York, NY 10016 Attention: Alpa Rana, Chief Financial Officer and Chief Compliance Officer Phone: +1 646 553 2490 Email: Privacy@contourasset.com

Contour takes its responsibility to protect the privacy and confidentiality of your Information very seriously. If Contour materially changes its privacy policies to permit it or its affiliates to share additional information Contour has about you or to permit disclosures to additional types of parties, you will be notified in advance, and, if required by law, you will be given the opportunity to consent to such disclosure, as appropriate, or opt out of such additional disclosure and to direct Contour not to share your Information with such parties.

California Specific Privacy Policy
<p>Under the California Consumer Privacy Act (with any implementing regulations and as may be amended from time to time, “CCPA”), California residents have specific rights regarding their “personal information.” If you are a California resident, this section includes information about how and why we collect, use, and disclose your personal information, our Notice at Collection and potential rights with regard to your personal information under the CCPA.</p> <p>The rights described herein are subject to exemptions and other limitations under applicable law. Terms used herein have the meaning ascribed to them in the CCPA. We are a “business.”</p> <p>NOTICE AT COLLECTION AND USE OF PERSONAL INFORMATION</p> <p><u>Personal Information We Collect</u></p> <p>Depending on how you interact with us, we may collect certain categories of personal information from or about you including:</p> <ul style="list-style-type: none"> • identifiers and similar information such as, name, address, date of birth, email address, social security number, driver’s license number, tax identification number, passport number, online identifiers or other similar identifiers; • additional information subject to California Civil Code Section 1798.80(e), such as a signature, education information, state identification number, credit card, bank account, assets, account balances, wire instructions, or other financial information;

- characteristics of protected classifications under certain federal or state laws, including gender, national origin, or marital status;
- commercial information, including records of products or services purchased, obtained, or considered, or other purchasing histories or tendencies, including Funds in which you are invested, investments considered, or sources of wealth;
- audio, electronic, visual, or similar information;
- professional or employment-related information, including investment experience, occupation, compensation, employer, and title;
- inferences drawn from any of the information identified above to create a profile reflecting your preferences or similar information, including your potential interest in investing in new funds; and
- sensitive personal information under the CCPA such as your passport number, driver's license, citizenship and immigration status and state identification card.

Purposes for Collecting and Using Personal Information

We may collect and use your personal information for the following purposes, including:

- performing services on behalf of a fund, including maintaining or servicing accounts, providing investor relations services, processing subscriptions, redemptions, verifying information, processing payments or providing similar services;
- communicating with you;
- performing our contractual obligations to a California Resident as a subscriber to a fund, including providing updates on a fund's performance, providing tax reporting and other operational matters;
- detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity, including preventing fraud and conducting "Know Your Client," anti-money laundering, terrorist financing, and conflict checks;
- enabling or effecting commercial transactions, including, using bank account details to remit funds and process distributions;
- where permitted by applicable law, providing you with marketing or promotional materials;
- administering and improving our website; and
- internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.

How Long We Keep Information

How long we keep your personal information will vary depending on the type of personal information and our reasons for collecting it. The retention period will be determined by various criteria, including the purposes for which we are using it (as it will need to be kept for as long as is necessary for any of those purposes) and our legal obligations (as laws or regulations may set a minimum period for which we have to keep your personal information). In general, we will retain your personal information for as long as we require it to perform our contractual rights and obligations or for periods required by our legal and regulatory obligations.

Sale or Sharing of Personal Information

We do not sell or share your personal information (as such terms are defined under the CCPA). For more information about our privacy practices, please review our entire Privacy Policy above.

OUR COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION AND SENSITIVE PERSONAL INFORMATION

Information We Have Collected and Our Purpose for Collecting It

In the preceding 12 months, and depending on how you interact with us, we may have collected the categories of personal information listed above in **Personal Information We Collect**. We may have collected all or a few of these categories of personal information for the business or commercial purposes identified in **Purpose for Collecting and Using Personal Information**.

Sources of Personal Information

We may collect personal information about you directly from you and/or your intermediaries through sources such as:

- subscription agreements, and other forms or related documentation;
- written, electronic, or verbal correspondence with us or our service providers;
- investor transactions;
- an investor's brokerage or financial advisory firm, financial advisor, or consultant; and/or
- from information captured on applicable websites.

In addition, we may collect personal information from different sources, such as:

- our affiliates, our service providers, or our affiliates' service providers;
- public websites or other publicly accessible directories and sources, including bankruptcy registers, tax authorities, governmental agencies and departments, and regulatory authorities; and/or
- from credit reporting agencies, sanctions screening databases, or from sources designed to detect and prevent fraud.

Disclosure of Personal Information

We do not sell or share your personal information as defined under the CCPA. We do not knowingly sell or share the personal information of California residents under 16 years old.

In the preceding 12 months, we may have disclosed for a business purpose the following categories of personal information to the following categories of third parties, as described in the following chart:

Category of Personal Information	Category of Third Party
<ul style="list-style-type: none"> • Identifiers (for example your name, address, DOB, SSN, driver’s license, passport number and online identifiers) • Additional information subject to Cal. Civ. Code § 1798.80(e) (for example, a signature, state identification card number, financial information, or bank account information) • Commercial Information (for example records of products or services purchased, obtained or considered or purchasing histories or tendencies including funds in which you are invested, investments considered or sources of wealth) • Professional or Employment Related Information, including occupation, compensation, employer and title • Characteristics of protected classifications under certain federal or state laws (for example gender, age, national origin, citizenship or marital status) 	<ul style="list-style-type: none"> • Counterparties and intermediaries (e.g., broker-dealers) in connection with investments and transactions or for operational purposes • Third parties as needed to complete a transaction, including financial institutions or advisors, entities that assist with fraud prevention, custodians or lenders to or creditors of a fund • Any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of our business or assets • Professional services organizations, such as auditors • Providers or partners that support our business operations (such as payment services providers; shipping companies; etc.) • Affiliated entities • Operating systems, such as CRMs and platforms

In addition, we may disclose and, in the preceding 12 months, we may have disclosed all of the categories of personal information identified in **Personal Information We Collect** above, to the following categories of third parties: (i) judicial courts, regulators, or other government agents purporting to have jurisdiction over us, our subsidiaries or our affiliates, or opposing counsel and parties to litigation; and (ii) other third parties as may otherwise be permitted by law.

We may disclose personal information to all of the third parties listed in the table above to comply with our legal obligations or for the business or commercial purposes identified above in **Purposes for Collecting and Using Personal Information**. We may also transfer to another entity or its affiliates or service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, change in ownership control, or financing transaction. Additionally, we may disclose your personal information to third parties upon your request, at your direction or with your consent.

We may disclose or make available your personal information with our service providers such as our fund administrators, accountants, auditors, and primer brokers, other entities that have agreed to limitations on the use of your personal information, or entities that fit within other exemptions or exceptions in, or as otherwise permitted by, the CCPA.

Use and Disclosure of Sensitive Personal Information

As noted above in **Personal Information We Collect**, certain personal information we collect and process may be considered “sensitive personal information” under the CCPA. The CCPA requires that we provide you with a right to limit our use or disclosure of such sensitive personal information in certain

circumstances. Currently, we are not using your sensitive personal information for purposes that would require that we provide you with a right to limit.

California Residents' Rights under the CCPA

If your personal information is subject to the CCPA, you may have certain rights concerning that information, subject to applicable exemptions and limitations, including the right to: (i) be informed, at or before the point of collection, of the categories of personal information to be collected and the purposes for which the categories of personal information shall be used; (ii) not be discriminated against because you exercise any of your rights under the CCPA; (iii) request that we delete any personal information about you that we collected or maintained, subject to certain exceptions ("Request to Delete"); (iv) opt-out of the "sale" (as that term is defined in the CCPA) of your personal information if a business sells your personal information (we do not); (v) opt-out of the "sharing" (as that term is defined in the CCPA) of your personal information if a business shares your personal information with third parties (we do not); (vi) limit the use and disclosure of sensitive personal information where required by the CCPA ("Right to Limit") (please note that we are not using your sensitive personal information for purposes that would require that we provide you with a Right to Limit); (vii) correct inaccurate personal information ("Request to Correct"); and (viii) request that we, as a business that collects personal information about you and that discloses your personal information for a business purpose, disclose to you ("Request to Know"): (a) the categories of personal information we have collected about you; (b) the categories of sources from which we have collected the personal information; (c) the business or commercial purpose for collecting the personal information; (d) the categories of third parties with which we disclose personal information about you; and (e) the specific pieces of personal information we have collected about you.

The CCPA does not restrict our ability to do certain things like comply with other laws or comply with regulatory investigations. In addition, the CCPA does not apply to certain information like personal information collected, processed, sold, shared or disclosed pursuant to the pursuant to the federal Gramm-Leach-Bliley Act and its implementing regulations. We also reserve the right to retain, and not to delete, certain personal information after receipt of a Request to Delete from you where permitted by the CCPA or another law or regulation.

How to Submit a Request under the CCPA

You may submit a Request to Know, Request to Correct or a Request to Delete ("Consumer Rights Request"), as described above, by emailing the use to: Alpa Rana, Chief Financial Officer and Chief Compliance Officer, who can be contacted at Privacy@contourasset.com or at +1 646 553 2490, with "CCPA Rights Request" in the subject line, or through our website at the following link <https://contourasset.com/>. You may request this Privacy Policy in an alternative format.

We are only required to respond to verifiable Consumer Rights Requests made by you or your authorized agent. When you submit a Consumer Rights Request, we may ask that you provide clarifying or identifying information to verify your request. Such information may include, at a minimum, depending on the sensitivity of the information you are requesting and the type of request you are making, your name and email address. Any information gathered as part of the verification process will be used for verification purposes only.

You are permitted to designate an authorized agent to submit a Consumer Rights Request on your behalf and have that authorized agent submit the request through the provided methods. We may deny requests from authorized agents who do not submit proof that they have been authorized by you to act on your behalf. We may also require that you directly verify your own identity with us and directly confirm with us that you provided the authorized agent permission to submit the request.

Changes to this Privacy Policy

Contour reserves the right to modify this California privacy policy at any time and without prior notice. We encourage you to review the most current version of this policy provided to you.

Contact for More Information

This California specific privacy policy is available in alternative formats upon request. If you have any questions or concerns about this notice or if you wish to obtain this policy in alternative formats, please contact us at:

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