

## **Counter Asset Management LLC Privacy Policy**

Contour Asset Management LLC and its affiliates (referred to collectively in this policy as Contour, “we,” “us,” “our” and other similar pronouns) respect your privacy as a visitor to the [www.contourasset.com](http://www.contourasset.com) website (the “Site”). It is important for you to understand what information Contour collects about you during your visit and how we will use, disclose and protect this information once it is collected, and how you can opt-out of some of our uses and disclosures of your information. This Privacy Policy services as a supplement and is not intended to replace the Contour Asset Management Privacy Notice.

As our business evolves, this Privacy Policy may change, so check back to this page periodically to make sure you understand how your personal information will be treated. This Privacy Policy does not apply to information that you may provide to us, or that we may obtain, other than through this Site, such as over the phone, by mail or in person, or otherwise through the provision of our investment management services to our clients.

If you are located outside of the United States, you should know that the information you provide to us is being transmitted to us and processed in the United States and will be protected subject to this Privacy Policy and United States laws, which may not be as protective as the laws in your country. Also, this Site places cookies and local shared objects on your computer or device which are further described below. By visiting the Site, you agree to the terms of this Privacy Policy.

### **The Types of Information Contour Collects About You**

#### ***User-Provided Information***

“Personal identifiable information” is information that can be used to identify you as an individual or allow someone to contact you, as well as information attributed with such information. Contour may collect personally identifiable information such as your name, e-mail address, phone number, and facsimile number. Contour may collect personally identifiable information by various means, including when you submit a comment or question to us using a “Contact Us” or similar feature on the Site or when you send us an e-mail to an e-mail address listed on the Site.

#### ***Site Usage Information***

As is the case with many Web sites, our servers automatically collect your IP address when you visit the Site, and we may associate that with your domain name or that of your Internet access provider. We may also capture certain “clickstream data” pertaining to your Site usage. Clickstream data includes, for example, computer and connection information such as browser type, version, and time zone setting, browser plug-in types and versions, operating system, and platform; the full Uniform Resource Locator (URL) clickstream to, though, and from the Site, including date and time; cookie number; and the phone number you used to call Contour. During some visits Contour may use software tools such as JavaScript to measure and collect session information, including page response times, download errors, length of visits to certain pages,

page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page.

**By using the Site, you consent to Contour’s use of these tracking technologies as described above.**

### **How Contour Uses Your Information**

We or our service providers may use the information we collect from and about you, including User-Provided Information and Site Usage Information, to perform the following business functions:

- enabling users to use our Site and its features;
- administering the Site;
- responding to your requests or questions;
- other purposes disclosed when personal information is submitted to us.

To perform the above functions, we may match information collected from you through different means or at different times, including both personal information and Site Usage Information, and use such information along with information obtained from other sources and publicly accessible information (such as information available publicly on the Internet). This information includes, for example, demographic information and updated contact information. We or our service providers may also use your information to assess the level of interest in, and use of, the Site, our e-mails and our other messaging campaigns both on an individual basis and in the aggregate.

### **How Contour Shares Your Information**

We may share the information we collect on the Site with others for a variety of reasons. We share your information, including the types listed in the User-Provided Information and Site Usage Information sections listed above with third parties who need your information in order to provide services to us (or on our behalf). In addition, we may share your information:

- When we believe in good faith that disclosure is necessary to protect our rights or property, or protect your safety or the safety of others;
- To our affiliates and service providers (e.g., our attorneys, accountants and auditors, lending institutions, third party administrators and record keepers for our funds, and entities that assist us with the distribution of stock to our investors), to the entities into which Contour has invested, and to the sponsors of such entities;
- At your direction or with your consent, including upon your authorization to disclose such information to persons acting in a fiduciary or representative capacity on your behalf;
- To respond to a subpoena or court order, judicial process or regulatory inquiry; and

- in connection with a corporate change or dissolution, including for example a merger, acquisition, reorganization, consolidation, bankruptcy, liquidation, sale of assets or wind down of business.

In addition, we may share non-personally identifiable Site Usage Information (including aggregate data) with others, for their own use, in a form that does not include your name or contact information.

### **Storage and Security of Personal Information**

While we endeavor to protect the security and integrity of sensitive Personal Information collected via this Site, due to the inherent nature of the Internet as an open global communications vehicle, we cannot guarantee that any information, during transmission through the Internet or while stored on our system or otherwise in our care, will be absolutely safe from intrusion by others, such as hackers.

If you correspond with us by e-mail or using Web forms like a “contact us” feature on our Site, you should be aware that your transmission might not be secure. A third party could view the information you send in transit by such means. We will have no liability for disclosure of your information due to errors or unauthorized acts of third parties during or after transmission.

If at any time during or after our relationship we believe that the security of your Personal Information in our care may have been compromised, we may seek to notify you of that development. If a notification is appropriate, we will endeavor to notify you as promptly as possible under the circumstances. If we have your e-mail address, we may notify you by e-mail to the most recent e-mail address you have provided us. If you receive a notice from us, you can print it to retain a copy of it. To receive these notices, you must check your e-mail account using your computer or mobile device and email application software. You consent to our use of e-mail as a means of such notification. If you prefer for us to use the U.S. Postal Service to notify you in this situation, please e-mail us at [privacy@contourasset.com](mailto:privacy@contourasset.com). You can make this election any time, and it will apply to notifications we make after a reasonable time thereafter for us to process your request. You may also use this e-mail address to request a print copy, at no charge, of an electronic notice we have sent to you regarding a compromise of your Personal Information.

### **“Linked-To” Web Sites**

The Site may contain links or widgets that lead to other Web sites. We are not responsible for these other sites, and so their posted privacy policies (not this Policy) will govern the collection and use of your information on them. We encourage you to read the privacy statements of each Web site visited after leaving the Site to learn about how your information is treated by others.

### **Your Privacy Rights**

You may request that we update or delete certain of your Personal Information and Site Usage Information, subject to some conditions, by contacting us using the “Contact Us” information below. 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 have the right to access your information and Contour will provide it as soon as it is practicable. You have the right to portability and may request to receive your information in a portable format. You have the right to object to automated decision-making technology, which Contour does not utilize.

Contour will not discriminate against you for exercising your privacy rights.

### **Opt In and Opt Out**

You may have the right to opt in to or opt out of certain of our uses and disclosures of your Personal Information. For example, when you are asked to provide Personal Information on this Site, you may have the opportunity to elect to, or not to, receive messages from us by e-mail. If you wish to opt-out, please email [privacy@contourasset.com](mailto:privacy@contourasset.com). 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 correspondence from us, we may still contact you in connection with your relationship, activities, transactions and communications with us.

Under the California Consumer Privacy Act (“CCPA”), you have the right of opt-out sale of personal information. Contour does not sell personal information.

### **Do Not Track Disclosures**

**Some web browsers may transmit “do-not-track” (DNT) signals to the websites with which the user communicates. Because of differences in how web browsers incorporate and activate this feature, it is not always clear whether users intend for these signals to be transmitted, or whether they even are aware of them. We currently do not change our tracking practices (which are explained in more detail under “Site Usage Information” above) in response to DNT settings in your web browser.**

Our third-party partners collect information about your online activities over time and across our Site and other online properties. These third parties may not change their tracking practices in response to DNT settings in your web browser and we do not obligate these parties to honor DNT settings.

### **Wireless Addresses**

If the e-mail address you provide to us is a wireless e-mail address, you agree to receive messages from us at such address unless and until you tell us not to send messages to that address, by emailing [privacy@contourasset.com](mailto:privacy@contourasset.com). Your wireless carrier’s standard rates will apply if you are receiving messages at a wireless e-mail address. If you give us a wireless e-mail address, you represent that you are the owner or authorized user of the device on which messages will be received and that you are authorized to approve the applicable charges.

### **Changes to this Privacy Policy**

Contour reserves the right to modify this Privacy Policy at any time and without prior notice.

## **Contact Us**

If you have any questions or comments regarding our privacy practices, or if you wish to request access to, correct or delete any personal information that you have provided to us, you may contact us at:

Webmaster  
Contour Asset Management LLC  
99 Park Avenue, Suite 1540  
New York, NY 10016

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