

FIVE MILE

Five Mile Capital Privacy Statement for Individual Investors

We at Five Mile Capital recognize and respect the privacy expectations of consumers that are attendant to the nature of our business and are required by applicable federal and state privacy laws. This Privacy Statement explains how we use and protect your non-public personal information (“Personal Information”) and under what circumstances it may be disclosed. This Privacy Statement applies to, and is provided on behalf of, each of the Five Mile Capital family of companies. We reserve the right to change this Privacy Statement from time to time consistent with applicable privacy and other laws.

The Categories of Personal Information We Collect

We only collect Personal Information relating to our individual investors. Examples of the types of Personal Information we collect include, but are not limited to:

- Information that you provide us in the course of our relationship or that we collect through our transactions with you, including name, address, social security number, bank and tax information, net worth and other similar information.

Our Policies Regarding the Protection of the Confidentiality and Security of Personal Information

We maintain physical, electronic and procedural safeguards to protect Personal Information and require any service providers or contractors to do the same.

Our Policies and Practices Regarding the Sharing of Personal Information

We do not share Personal Information, except in the following circumstances:

Within the Five Mile Capital Family

We share Personal Information within the Five Mile Capital family of companies in order to serve your relationship. Direct access to Personal Information is limited only to those officers, directors or employees of Five Mile Capital companies who require access to that information in connection with investors’ accounts, and administration of our funds.

With the Investor Or At the Investor’s Direction

We will disclose Personal Information in an individual investor’s file with that investor as needed to administer the investor’s account or to provide requested services. We also will disclose Personal Information to third parties at the investor’s direction, upon written request.

Service Providers or Contractors

We use third-party contractors or service providers to process or service transactions for us or to perform functions for us or on our behalf. Examples include, but are not limited to, technical or computer-related support services or consulting. Those contractors are required to abide by the terms of our Privacy Statement, and, if their functions require the ability to access Personal Information, they may access Personal Information only for the purposes for which they have been retained. They will not disclose Personal Information to any third parties except at our direction, and consistent with this Statement and applicable law.

Other Circumstances

In addition, we will disclose Personal Information when we are required by law to do so, or when we suspect fraudulent or criminal activities. We also may disclose Personal Information when otherwise permitted by applicable privacy laws such as, for example, when disclosure is needed to enforce our rights arising out of any agreement, transaction or relationship with you.

Questions

You may contact Wanda Ocinaldi with any questions or concerns about this Privacy Statement at wocinaldi@fivemilecapital.com.

PRIVILEGED & CONFIDENTIAL