

Quantitative Investment Management LLC
NOTIFICATION OF PRIVACY POLICIES AND PRACTICES

Financial institutions, including Quantitative Investment Management LLC (“QIM”), are required to provide their clients with notification of privacy policies and practices. Maintaining the confidentiality of the personal information of our current and prospective investors is one of our highest priorities. This notice sets forth the type of personal information we collect, how that information is used by us, and how we protect your personal information.

QIM is the “data controller” as defined under European data privacy laws including, but not limited to, the General Data Protection Regulation 2016/679 (“GDPR”). For the purposes of this notice, the GDPR together with other applicable European data privacy laws are referred to as the “Privacy Laws”. This notice describes the basis on which we process your personal information (defined as “personal data” under the Privacy Laws), for what purposes, and your privacy rights under the Privacy Laws.

Information We Collect

Personal information is collected from you in order to offer or provide you with products or services, process transactions on your behalf, and comply with legal and regulatory requirements.

Information may be collected from any of the following sources.

From You: We collect information from you when you enter into a subscription agreement with a fund we manage. We may also collect information from investor questionnaires, W-8s, W-9s, and other applications or forms that you complete when requesting information or services from us. This information may include items such as your name, address, email address, social security number, birth date, annual income, assets, net worth, investment experience and marital status. We may also collect personal information provided by you in any calls that are recorded by us as required by applicable laws. We may also collect special categories of personal data (as defined in the GDPR and including health, disability and religious or ethnicity information) for purposes required by you such as scheduling of meetings or access to our offices.

From Transactions: If you invest in a fund we manage, we keep records relating to items such as your account balance and transaction history, which enables us to resourcefully service your account.

From Our Website: If you visit our website, we may track the amount of time you spend on our site, the parts of our site you visited, and other technical information. We use this information to improve the functionality of our website. Your personal information is collected and maintained by us so we may develop, offer, and deliver products and services to you, process transactions in your account, and fulfil our legal and regulatory requirements. You may also submit personal information directly through our website.

How We Use Information that We Collect

We collect your personal information to fulfil our contractual obligations, our statutory obligations and/or the legitimate business interests of QIM. We also collect your personal information for other purposes for which QIM has a lawful basis under the Privacy Laws, including (i) for compliance with legal and regulatory requirements such as regulations aimed at the prevention of money laundering or terrorist financing or “Know Your Customer”

requirements, as well as to verify your status and/or eligibility to invest in funds we manage and for compliance with tax reporting requirements, (ii) for purposes of reporting to, or communicating with, you concerning your investment in our funds or the appointment or engagement of us consistent with our obligations to such clients; (iii) in connection with our investment activities, including due diligence or monitoring activities or in response to “Know Your Customer” requirements of counter-parties; (iv) in connection with litigation, investigations, regulatory or governmental enquiries or for other legal or regulatory purposes involving QIM, our funds or our clients; and (v) for other legitimate business interests. If you have provided special categories of personal data to us to enable us to respond to certain requests by you such as access requests or scheduling of meetings or similar requirements, we do so with your consent.

In addition, we may, and only with your consent, process your personal information in order to communicate with you for marketing purposes. In this event, we may provide additional information that we believe may be of interest, including fund performance data. If you have provided your consent to receive these communications, you have the right to unsubscribe by emailing investorrelations@quantitative.com or by following the instructions in any such communication, e.g. by clicking on the link to unsubscribe.

Information We Disclose

Internal Disclosures:

We may share your personal information with our affiliates and funds that we manage for any of the purposes described above. These recipients are not permitted to share your information with other entities, except as described herein or otherwise permitted by the Privacy Laws or other applicable laws. The transfer of personal data from the UK/European Economic Area (“EEA”) to recipients outside the EEA is governed by data transfer agreements, which are in the form of the standard contractual clauses approved by the European Commission. Those clauses are available at the following links:

<http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32004D0915>

<http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32010D0087>

External Disclosures:

We may share your personal information with non-affiliated third parties for any of the purposes described above. We share your personal information with service providers such as attorneys, auditors, accountants, tax advisers, administrators, custodians, depositaries, distribution managers and brokerage firms, compliance consultants, or other agents, advisers or service providers of any fund or affiliate. As is common in the industry, non-affiliated third party companies may from time to time be used to provide certain services, such as administration services, tax compliance services, reporting, account statements and other information. These companies may have access to your personal information but are permitted to use the information solely to provide the specific service or as otherwise permitted by law. Where your personal information is processed by third parties outside the EEA, we will ensure appropriate safeguards are in place to adequately protect it, as required by applicable law, including the execution of standard contractual clauses (referred to above) if the recipients are not located in a country with adequate data protection laws (as determined by the European Commission) or certified under the EU-US Privacy Shield framework.

Protection of Your Personal Information

Our employees may, from time to time, have access to your personal information in order to provide services to you. All QIM employees are subject to the terms of our compliance manual, which requires employees to treat confidentially all information obtained from or about you or your account. We also maintain physical, electronic, and procedural safeguards designed to protect non-public personal financial information. Where your personal information is processed by third parties outside the EEA, we will ensure appropriate safeguards are in place to adequately protect it, as required by applicable law, including the execution of standard contractual clauses (referred to above) if the recipients are not located in a country with adequate data protection laws (as determined by the European Commission) or certified under the EU-US Privacy Shield framework.

Your Privacy Rights

You have certain rights relating to the personal information we hold in accordance with and subject to the Privacy Laws to: (i) check whether we hold personal information about you and access such data in accordance with our policy; (ii) request the correction of personal information about you that is inaccurate; (iii) have a copy of the personal information we hold about you provided to you or another data controller where technically feasible; (iv) request the erasure of your personal information; and (v) request the restriction of processing certain information concerning you. To do so, please send your request to investorrelations@quantitative.com. You are required to ensure the personal information we hold about you is up-to-date and accurate, and you must notify us of any changes to the personal data you provided to us in, for example, information supplied in relation to an investment in a fund we manage. If you provided consent for us to use your personal information, including for marketing purposes, you have the right to withdraw consent and we will process this withdrawal promptly.

Data Retention

We retain your personal information for a period of at least five years from the date on which the relevant business relationship, for which purpose such personal data was provided, has ended (or, if later, the date on which the last transaction was completed or the last entry to the record was made).

If you have any questions or concerns regarding this notification, please contact Michael Geismar or Molly Dunnington at (434) 817-4800. You may also make a complaint, in accordance with applicable Privacy Laws, to a supervisory authority in your country of residence.