

Privacy Policy

March 15, 2019



Federal law requires that Vivaldi Capital Management, LLC advise its investors about how the firm collects, shares, and protects investors' personal information. Please read this notice (this "**Privacy Policy**") carefully to understand what the firm does. This Privacy Policy applies to current and former investors.

Vivaldi is committed to protecting investors' privacy and maintaining the confidentiality and security of their personal information. This Privacy Policy explains the manner in which Vivaldi collects, utilizes and maintains nonpublic personal information about its investors ("**Investor Information**"). "**Vivaldi**", as the term is used here, collectively refers to Vivaldi Capital Management, LLC, and each investment program, partnership, limited liability company or fund (individually, a "**Fund**," and collectively, the "**Funds**") for which Vivaldi Capital Management, LLC, serves as general partner, manager, managing member, trading member, director and/or investment manager. This Privacy Policy only applies to products and services provided by Vivaldi to individuals that are used for personal, family, or household purposes (not business purposes).

Collection of Investor Information

Vivaldi collects the following Investor Information:

- Name, address, social security number, nationality, employment information, and financial and investment qualifications (including income, assets and investment experience) as well as wire transfer instructions from investor questionnaires, subscription documents, account forms, and other information provided by investors in writing, in person, by telephone, electronically or by any other means; and
- Account balances, investments, withdrawals/redemptions and fees from account activity.

In addition to collecting information through conversation and from documents provided to Vivaldi, Vivaldi may acquire information about investors from verification services and consumer reporting agencies. Such information may include an investor's creditworthiness or credit history. Vivaldi does not generally use these services.

Disclosure of Nonpublic Personal Information

Vivaldi may share Investor Information in the context of providing everyday business services. Such services include investigating and responding to investor inquiries about their accounts and investments, processing transactions, maintaining accounts, and responding to court orders. Additionally, Vivaldi may share Investor Information with affiliates, as permitted or required by law.

Vivaldi does not disclose nonpublic personal information about investors or potential investors to nonaffiliated third parties, except as permitted by law (for example, to service providers who provide services to investors).

Protection of Investor Information

To protect Investor Information from unauthorized access and use, Vivaldi uses security measures in accordance with federal law and applicable state standards. These measures include computer safeguards and secured files and buildings. Further, Vivaldi restricts access to investors' personal and account information to those employees with a need to know that information in the course of fulfilling their job responsibilities. Vivaldi and its service providers will destroy, erase or make unreadable data, computer files and documents containing nonpublic personal information prior to disposal.

Further Information

Vivaldi reserves the right to change this Privacy Policy at any time. The examples contained within this Policy are illustrations and are not intended to be exclusive. Investors may have additional rights under other foreign or domestic laws that may be applicable to them. Questions about this Privacy Policy may be directed to Vivaldi at 312.248.8300.