

Upround Ventures is committed to maintaining the confidentiality, integrity and security of its current, prospective and former clients' non-public personal information. Upround Ventures privacy policies are designed to protect this confidentiality, while allowing clients' needs to be served.

### **Obtaining Personal Information**

In the course of providing clients with products and services, Upround Ventures and certain service providers to Upround Ventures, such as the Upround Ventures' investment advisers ("Advisers"), may obtain non-public personal information about clients, which may come from sources such as account applications and other forms, from other written, electronic or verbal correspondence, from client transactions, from a client's brokerage or financial advisory firm, financial advisor or consultant, and/or from information captured on applicable websites.

On certain areas of its websites, Upround Ventures allows you to provide personal information so that we may fulfill your requests for information or otherwise allow you to interact with us. For instance, personal information may be used to fulfill your requests for Upround Ventures publications, to allow you to publish comments on our website content, or to facilitate our receipt and processing of your career-related inquiries.

### **What types of personal information is collected?**

The personally identifiable information that may be collected might include your name, address, e-mail address, and telephone number. Additional background information might be collected in connection with career-related inquiries.

In addition, Upround Ventures may collect certain types of information that you do not visibly enter, such as your IP address, browsing patterns on our websites, click stream data, and HTTP protocol elements. This tracking information is stored in anonymous, aggregated and non-personal format, and is used to understand and analyze trends, to administer the websites, and to learn about user behavior on the websites. This information collected from your web browser as small files stored on your device are commonly referred to as "cookies".

You can change your cookie preferences by changing the setting on your web browser to delete or reject cookies. If you delete or reject cookies, some website pages may not function properly.

Upround Ventures may use IP addresses to help identify you when Upround Ventures feels, in its sole discretion, that it is necessary to enforce compliance with this Privacy Policy, to protect its services, websites, systems, information, employees, business partners, subsidiaries, affiliates, users, customers or others, or when required by law or for law enforcement purposes.

Upround Ventures will not transfer, disclose, sell, distribute, or lease your personal information to third parties other than as described in this Privacy Policy unless we have your permission or are required or permitted by law. We may share such information with our affiliates as necessary to carry out the purposes for which the information was supplied by you. Similarly, third party vendors engaged by Upround Ventures to provide services related to our website may have access to the personal information you provide (such vendors must first agree to maintain the strict confidentiality of such information and provide the same level of data security as provided by Upround Ventures).

### **Procedures to Safeguard Private Information**

The Funds take seriously the obligation to safeguard shareholder non-public personal information. Physical, electronic and procedural safeguards are in place to guard a shareholder's non-public personal information.

### **Changes to the Privacy Policy**

From time to time, Upround Ventures may update or revise this privacy policy. If there are changes to the terms of this privacy policy, documents containing the revised policy on the relevant website will be updated.

Updated as of January 1, 2016.