

# Data Protection Notice

The **Ultimus Group, LLC**, and its subsidiaries (together “**Ultimus**”, “**we**” or “**our**”) are committed to protecting the privacy and security of all personal data of its customers, customers’ employees, clients, and their underlying investors, as well as commercial partners.

This notice describes how we collect, hold, use, and disclose personal information that you provide, is provided on behalf, or is collected by us.

Ultimus complies with the principles of the General Data Protection Regulations (“GDPR”). The overall guiding principles are:

1. Lawfulness, transparency, and fairness
2. Purpose limitation
3. Data minimization
4. Accuracy
5. Storage Limitation
6. Confidentiality and integrity
7. Accountability

Your privacy and security are of the utmost importance to Ultimus.

## Definitions

“**Ultimus**” means The Ultimus Group, LLC, and affiliates (including financial and nonfinancial companies related by common ownership or control) include:

Ultimus Fund Solutions, LLC	Blu Giant, LLC
Ultimus Holdings, LLC	Gemini Fund Services, LLC
Ultimus Intermediary, LLC	Gemini Hedge Fund Services, LLC
Ultimus Fund Distributors, LLC	Northern Lights Compliance Services, LLC
Ultimus Asset Services, LLC	Northern Lights Distributors, LLC
Ultimus Private Fund Solutions, LLC	The Ultimus Group Intermediate, LLC
LeverPoint Management, LLC	The Ultimus Group Midco, LLC
FD Fund Administration, LLC	

“**Data Subject**” means any individual person formally residing in the European Union (EU) who has their data collected, held, or processed by a controller or a processor.

“**Personal Information**” means any information which is related to an identified or identifiable natural person (i.e., Data Subject) directly or indirectly, which is required to fulfill Ultimus’ processing of contractual servicing requirements.

“**Processing**” involves any automated, manual operation or set of operations performed on personal data, including the collection, recording, organization, structuring, storage, adaptation, or retrieval.

## How We Collect Data

Ultimus collects your personal information when you:

- Open an account
- Provide income information
- Provide employment information
- Provide account information
- Provide your contact information
- Visit our website; technical data including your IP address is collected using cookies unless you have specifically adjusted your browser’s preferences to refuse cookies.

Ultimus also collects your personal information from others, such as credit bureaus, Ultimus affiliates and other companies.

Failure to collect certain Personal Information may prevent Ultimus from fulfilling its legitimate interest in operating its business to comply with certain contractual obligations, laws, rules, and regulations to which Ultimus is subject.

Personal Information may also be transferred to Ultimus from international sources through appropriate transfer mechanisms.

## How We Use Data

Ultimus will only process personal data for the purposes for which it has been provided to Ultimus to fulfill contractual requirements, unless otherwise permitted by applicable law. There are different legal bases that we rely on to use your personal information. The legal basis which Ultimus will process personal data are Ultimus’ legitimate interest in operating its business and to comply with contractual requirements, laws, rules, and regulations to which Ultimus is subject.

The types of personal information we collect, and share depends on the product or service you have with Ultimus. This information can include:

Social Security number	Account transactions
Employee information	Income
Account balances	Investment Experience

All financial companies need to share a customer’s personal information to run their everyday business – to process transactions, maintain customer accounts and report to credit bureaus.

Personal information may be subject to decisions based on automated decision-making processes which are designed to fulfil contractual obligations of Ultimus.

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## How We Disclose Data

In processing personal data for the purposes identified above, Ultimus may transfer or disclose such personal data to the following entities and their personnel and agents:

- Ultimus' affiliates (as defined above), Ultimus' agents, network, and service providers, including those providing audit, legal, tax, and information technology services; and
- Regulatory agencies with jurisdiction over Ultimus, as required by law.

Ultimus will only transfer personal data to a country or territory outside the European Economic Area (EEA) if that country or territory ensures an adequate level of protection for the rights and freedoms of individuals in relations to the processing of personal data or where adequate contractual safeguards to protect the data are in place. Ultimus is not responsible for the privacy practices of third-party websites.

## How We Store Data

To protect your personal information from unauthorized access and use, Ultimus uses security measures that comply with federal law. These measures include computer safeguards and secured files ad buildings. Ultimus will retain personal data only for as long as is reasonably necessary for the purpose for which it was provided, except to the extent Ultimus is required to retain such personal data for a longer period of time pursuant to applicable laws, rules, and regulations.

## How We Destroy Data

All computer desktops, laptops, hard drives, office copiers and portable media must be processed through the Ultimus IT team for proper disposal. Paper and hard copy records shall be disposed of in a secure manner. The Data Privacy Officer shall ensure procedures exist and are followed that:

- Address the evaluation and final disposition of sensitive information, hardware, or electronic media regardless of media format or type.
- Authorize personnel to dispose of sensitive information or equipment. Such procedures may include shredding, incinerating, or pulp of hard copy materials so that sensitive information cannot be reconstructed.

IT documentation, hardware, and storage that have been used to process, store, or transmit Confidential Information or personal data shall not be released into general surplus until it has been sanitized and all stored information has been cleared using one of the above methods.

## Data Subject's Rights

Data Subjects have a right to obtain a copy of, and the right to rectify any inaccuracies in, the personal data Ultimus holds about them by making a request to Ultimus in writing. Such individuals also have certain rights under the GDPR to request erasure, restriction, and portability, and to not be subject to a decision based on automated processing. An individual seeking to assert any such rights should contact Ultimus using the contact information below. Data Subjects shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Ultimus will respond to such a request in writing as soon as practicable, but in any event within the time frame prescribed by applicable law. Individuals also have the right to lodge a complaint with the relevant data protection supervisory authority if they are unhappy with how Ultimus is processing their personal data.

## Questions or Complaints

Our Data Protection Officer oversees how we collect, hold, and disclose personal information and protect your personal information to ensure your rights are fulfilled. For questions about this notice, to exercise your rights regarding your personal information held by us, or to make an inquiry, please contact our Data Protection Officer:

c/o The Ultimus Group, LLC  
225 Pictoria Drive, Ste 450  
Cincinnati, OH 45246

Data Protection Officer Email: [DPO@ultimusfundsolutions.com](mailto:DPO@ultimusfundsolutions.com)

Phone #: (513) 587-3400

You may make a complaint about an alleged breach by us of applicable privacy laws in relation to our handling of your personal information. Your complaints should be in writing and addressed to our Data Protection Officer. Alternatively, you have a right to lodge a complaint with the competent supervisory authority.

## Notice of Changes

We keep this notice under regular review and may modify or amend it from time to time at our discretion. If we make changes, we will record the date of amendment or modification at the top of the notice. The revised notice will apply to you and your information from that date. We would encourage you to review the notice periodically.