

ZEDRA Fund Services Privacy Policy



Effective Date: May 2026; Last Date Updated: May 2026

1. Applicability

This privacy policy describes how Zedra Fund Services (USA) LLC, Gryphon Fund Group LLP, Zedra Fund Administration (Cayman) Ltd, and Zedra Fund Services (Curacao) N.V. (collectively we refer to these entities in this policy as ZEDRA) process personal information about those who interact with our funds. This includes both investors (including any prospective investor) and beneficial owners, as well as directors, officers, managers and other related and controlling parties. It applies to information collected and used on the websites and apps where it appears and information collected via email. It does not apply to other situations, including other ZEDRA sites or apps where it does not appear.

By using the site, our services, or providing your personal information to us, you consent to the use of your information in accordance with this Privacy Policy. If you do not agree with any term in this Privacy Policy, you should not access and use the site, services or provide your personal information.

2. Information we collect

What information we collect depends on our relationship with you and the jurisdictions in which you reside. It may also depend on the laws that apply in your jurisdiction. We may collect the following:

- **Contact information.** We collect names and addresses. We also collect phone numbers and email addresses.
- **Verification information.** We may collect your bank account number and investment information. We may also collect your passport number or driver's license. We may collect a government identifier like a tax form or personal public service number (i.e. social security number).
- **Demographic information.** We may collect your date of birth and gender. We collect your nationality. We may collect your country of birth and your country of residence.
- **Site and device information.** We collect log and session data when you visit our platforms or interact with our systems. We may also collect browser and operating system information or IP address. We also collect device identifiers. When visiting our platforms we may collect what site you came from or what site you visit when you leave us.

3. How we use information

How we use your information depends on your relationship with us and the jurisdiction in which you reside. The reasons we might use your information are the following:

- **To provide our services.** We use your information to deliver fund administration and related services including processing, subscription, transfer, withdrawal/redemption and conversion documentation and establishing a register of investors. We also use your information to maintain accounts or funds and to process payments in respect of subscriptions, redemptions/withdrawals, capital calls, dividends or distributions.
- **To communicate with you.** We use information to communicate with you. This includes dispatching notices and investor statements, responding to requests and providing information you ask for.
- **To improve.** We use your information to improve our platforms and services. This may include customizing your experience with us. It may also include recording and monitoring calls for business analysis, staff training, and related purposes. We may also use information to analyze trends or statistical data.
- **For marketing purposes.** If you are a representative of our client, we use information to provide you with information about new products and services, and events we might host. We may also tell you about new features or updates. This may be by phone or email. We do this as permitted by relevant laws.
- **For security and legal compliance.** We use information to protect us or third parties. This might include you or business partners. We also use information to identify and investigate fraud or potential crimes, and to secure and protect our systems and assets. This includes by monitoring electronic communications. We will also use information to comply with legal and regulatory requirements. This includes anti-money laundering (AML) and counter terrorist financing checks, compliance with court orders, and reporting to tax authorities.
- **We use all categories of information for other purposes as permitted by law or as we may notify you.**

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Some jurisdictions require that we tell you the “legal basis” for how we use your information. Our legal basis for processing your information is to enter or perform a contract or because we have a legal obligation to process your information. It also includes if the processing is in our legitimate interest, and not overridden by your rights or interests. It also may in some cases be based on your consent. If we are using information based on consent, you have the right to refuse consent. If you consent and later wish to revoke your consent, you have the right to do so. To learn more, read the Choices section below.

4. How long we keep information

We keep information for as long as necessary or relevant for the purposes described in this policy. We also keep information as required by law.

5. How we collect information

We collect information directly from you. We collect personal information directly from you whether submitted through e-mail or submission through an online portal. These may be on subscription or capital contribution forms or redemption and withdrawal documentation. It may also be through transfer forms, questionnaires, or other documents needed for fund administration. It may also be when you interact with us on the phone or in writing.

We collect information about you from others. We may collect information about you from our affiliates or other entities with whom you are connected as a related person. This might include from fund managers, advisers, or service providers to our clients. We may also collect information about you from those who are authorized to act on someone’s behalf. We may also collect your information from publicly available sources, enabling us to supplement its records or verify details as needed.

6. Security measures

We use reasonable physical, electronic, and procedural security measures as required by law. The Internet is not 100% secure. We cannot promise that your use of our sites will be completely safe. We encourage you to use caution when using the Internet. This includes not sharing your passwords.

7. Information storage

Information we collect may be stored in the country in which you reside. It may also be transferred to and stored in another country, including (if you live outside of the United States) the United States. If you live outside of the United States and choose to use our platforms or otherwise enter into a relationship with us, you understand that it is at your own risk. The United States may not afford the same level of protection as laws in your own country.

8. When we disclose information

Listed below is when we may disclose your information. We may disclose all categories of information we have collected above with the categories of parties below.

- **To our affiliates.** We disclose personal information with other ZEDRA companies and affiliates. These companies may not be located in the same country in which you reside. We may disclose personal information to provide fund administration services and internal administrative functions. It may also include to handle compliance requirements like anti-money laundering and counter-terrorist financing checks.
- **To service providers or suppliers.** We disclose personal information with services providers and suppliers to provide our services and in connection with business operations. This includes, for example, IT support providers and those who assist with compliance audits.
- **To clients and their service providers.** We may disclose information to our clients, fund managers, brokers, regulators or banks. Additionally, we may disclose to any investment vehicle (including its administrator) that our client may invest. This includes if you are connected to a client fund or account as a director, officer, investor, or authorized signatory). These entities may also share personal information with their service providers. This may include to support fund management or fulfill regulatory requirements.
- **To comply with the law or to protect ourselves.** We disclose personal information to respond to a court order or subpoena. We will also disclose information in response to a government agency, public authority or investigatory body request.

This includes to meet national security or law enforcement requirements. We may also disclose this information to investigate potential fraud or to enforce our policies and terms. This may include disclosures to lawyers or other external professional advisors.

- **With successors to all or part of our business.** If all or part of our business is sold, we may transfer your personal information as part of that transaction. If there is a merger or acquisition, we will do this as well
- **For other reasons we may describe to you and as permitted by law.** Where required by law we will notify you or obtain any legally-required consent.

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9. Your rights and choices

9.1 Marketing

You may opt out of receiving marketing emails you receive from us. To do so, follow the instructions in the message you receive. You may still receive our transactional and relevant operational communications.

9.2 Additional rights in certain jurisdictions

If you are based in the Cayman Islands, or a jurisdiction with similar laws, you may have additional rights. Those rights depend on our relationship. The rights are subject to certain limitations and are not absolute. This might include if a legal exception applies. If that is the case, we will not be able to process your request. The rights include the following and may be offered based on your location:

- **Access and portability:** This includes the right to ask us to give you a copy of your information and the right to ask us to send this to another entity.
- **Correction or restriction/objection:** This includes asking us to make changes to your information. It also includes asking us to restrict processing of your information. You may also have the right to object to information processing, including if we are processing for our legitimate interests in certain locations. This may be based on grounds relating to your particular situation.
- **Deletion:** This includes asking us to delete your information.
- **Not being subject to automated decision-making:** This includes profiling that has legal effect on you or similarly significantly affects you.

You can exercise these rights by contacting us at dataprotection@zedra.com. We may take steps to verify your identity if we are in any doubt. We will let you know when or if a right does not apply to you. If you disagree with our decision, you can contact us (see How To Contact Us for points of contact). We will not discriminate against you because you exercised your rights. Depending on your location, you may take legal action or lodge a complaint with a regulator if you disagree with our decision.

If you are submitting a request on someone else's behalf, we may ask for additional verification. This may include a signed letter verifying your right to make this request. This may also include providing proof that you are registered with the Secretary of State to act on someone's behalf or proof of a power of attorney.

10. Information collection from children

Our sites are meant for adults. We do not knowingly collect personal information from children. If you are a parent or legal guardian and think your child has given us information without your permission, you can email us and request that your child's information be corrected or deleted. You can also write to us at the address listed at the end of this Policy. Please mark your inquiries "COPPA Information Request." Parents, you can learn more about how to protect children's privacy online here.

11. Third party sites and links

Our platforms may have links to third party sites or apps. If you click on a third-party link, you will be taken to platforms we do not control. This Privacy Policy does not apply to the privacy practices of those platforms. Read the other companies' privacy policies carefully. We cannot be and are not responsible for these third parties.

12. Updates to this Privacy Policy

We may make updates to this Policy from time to time. We will notify you as required by law and will post the updated version on the sites where this appears. Please check back periodically for updates.

13. How to contact us

For questions about our privacy policy or to make a complaint or enquiry, please contact us at dataprotection@zedra.com.