

# California Consumer Privacy Act Disclosure

Compass Rose Asset Management, LP and its affiliates value your privacy. This California Consumer Privacy Act Disclosure explains how Compass Rose collects, uses, and discloses personal information relating to California residents, pursuant to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act (as amended, the “CCPA”).

## Our Collection, Use, Disclosure, Sharing and Retention of Personal Information

Under the CCPA, “Personal Information” is information that identifies, relates to, or could reasonably be linked directly or indirectly with a particular California resident or household.

We collect Personal Information relating to California residents in a variety of contexts, including, for example, collecting Personal Information relating to individuals who request or obtain our fund documents, apply for employment with us or are our employees, vendors, contractors or similar personnel, and who visit our locations or facilities. The specific Personal Information that we collect, use, and disclose relating to a California resident will depend on our relationship or interaction with that specific California resident. Some of the categories of Personal Information that we collect are as follows:

- **Compass Rose Investor Portal** – Identifiers which may include real name, alias, postal address, unique personal identifiers, email address, account name, tax identification numbers, or other similar identifiers.
- **Job applicants or current employees** - Identifiers which may include real name, alias, postal address, unique personal identifiers, email address, account name, social security number, driver’s license number, passport number, or other similar identifiers. In addition, we may collect all professional and employment related information as well as electronic network activity.
- **Clients, prospective clients, corporate representatives of our vendors and other partners** - Identifiers which may include real name, alias, postal address, unique personal identifiers, email address, account name, tax identification numbers, or other similar identifiers.

**We do not sell Personal Information and have not sold Personal Information in the preceding 12 months.** We do not knowingly sell or “share” the Personal Information of minors under 16 years of age and younger.

## **Purposes for the Collection, Use and “Sharing” of Personal Information**

The purposes for which we use this Personal Information depend on our relationship or interaction with a specific California resident. We may use this information in order to operate, manage, and maintain our business, provide our products and services, for our employment and vendor management purposes, and to accomplish our business purposes and objectives.

## **How to Exercise CCPA rights**

To submit a request to exercise your rights to know, delete or correct, please email [IRTeam@CompassRoseAM.com](mailto:IRTeam@CompassRoseAM.com).