

FACTS	WHAT DOES CAPITAL FUND MANAGEMENT S.A. (“CFM”) DO WITH YOUR PERSONAL INFORMATION?
WHY?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
WHAT?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> <li>▪ Name, address, phone number, email address, social security number or federal tax identification number;</li> <li>▪ Financial information;</li> <li>▪ Wire transfer instructions, account transactions and balances;</li> <li>▪ Investment experience, objectives and risk appetite.</li> </ul>
HOW?	All financial companies need to share investors’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons CFM chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does CFM share?	Can you limit this sharing?
<b>For our everyday business purposes</b> - such as to process your transactions, maintain your accounts(s) or respond to court orders and legal investigations	Yes	No
<b>For our marketing purposes</b> - to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	N/A
<b>For our affiliates' everyday business purposes</b> - information about your transactions and experiences	Yes	No
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For non-affiliates to market their products to you</b>	No	N/A

To limit our sharing	<p>Mail the form below</p> <p><b>Please note:</b> If you are a <i>new</i> customer, we can begin sharing your information in <b>30</b> days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.</p>
Questions?	Contact CFM's CCO at <a href="mailto:compliance@cfm.fr">compliance@cfm.fr</a>

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**Mail-in Form:**

**Leave Blank OR**  Do not allow your affiliates to use my personal information to market to me.

if you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.

Apply my choices only to me

<p>Name</p> <p>Address</p> <p>City, State, Zip, Country</p> <p>[Account #]</p>	<p><u>Mail to:</u></p> <p>[Name of Financial Institution]</p> <p>[Address 1]</p> <p>[Address 2]</p> <p>[City], [ST] [ZIP] [COUNTRY]</p>
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**Who we are**

**Who is providing this notice?**

Capital Fund Management S.A. and its Affiliates and any pooled investment vehicle for which CFM or an Affiliate serves as an adviser, investment manager, general partner, managing member, sponsor or in another similar capacity (collectively "CFM" or "the Company").

**What we do**

**How does CFM protect my personal information?**

To protect your personal information from unauthorized access and use, CFM uses security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

When information about investors is disclosed to non-affiliated third parties, we require that the third party maintain the confidentiality of the information disclosed and limit the use of information by the third party solely to the purposes for which the information is disclosed or as otherwise required by law.

**How does CFM collect my personal information?**

CFM collects your personal information, for example, when you:

- Provide information related to a subscription form, investor questionnaire, investor meeting, or tax or account form in person, by telephone, electronically or by another other means;
- Provide account balances and conduct transactions;
- Provide other financial institutions and service providers with personal information who have relationships with CFM and those institutions are authorized to provide your personal information to CFM.
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**Why can't I limit all sharing?**

Federal law gives you the right to limit only:

- Sharing for affiliates' everyday business purposes—information about your creditworthiness;
- Affiliates from using your information to market to you;
- Sharing for non-affiliates to market to you.

State laws and individual companies may give you additional rights to limit sharing.

**Definitions**

**Affiliates**

Companies related by common ownership or control including Capital Fund Management International, Inc., CFM North America, Inc., Capital Fund Management LLP, CFM Asia KK and any Fund for which CFM or an Affiliate serves as an adviser, investment manager, general partner, managing member, sponsor or in another similar capacity. They can be financial and nonfinancial companies.

**Non-affiliates**

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

**Joint Marketing**

A formal agreement between CFM and a nonaffiliated financial company that together market joint financial products or services to you.

**Date of this document**

March 29, 2019 (annually revised).