



PDP CAPITAL INVESTMENTS

STATEMENT OF PRIVACY POLICY

Our Commitment to Your Privacy: Protecting your privacy is very important to PDP CAPITAL INVESTMENTS (“PDP” or “We”). PDP will not share nonpublic personal information about you with nonaffiliated third parties without your consent, except for specific purposes described below. This notice explains our collection, use, retention and security of information about you.

How PDP Acquires Information: We may obtain information about you from the following sources:

- Your new client account information and investment management agreement and other information that you provide at the time you become a client, whether in writing, in person, by telephone, electronically or by any other means. This information may include your name, address, phone number, e-mail address, social security number, employment information, income, investment experience, and credit references;
- Consumer reporting agencies. This information may include account information and credit history.

Sharing Information with Nonaffiliated Third Parties: We may disclose non-public personal information about you to nonaffiliated third parties without your consent when we believe it necessary for the conduct of our business or as required or permitted by law, such as:

- If you request or authorize the disclosure of the information;
- To respond to a subpoena or court order, judicial process, law enforcement or regulatory authorities;
- To perform services for the Firm or on its behalf to develop or maintain proprietary trading or other software
- In connection with a proposed or actual sale, merger, or transfer of all or a portion of our business or an operating unit; and
- To help us prevent fraud.

In addition, we may disclose any nonpublic personal information about you to service providers who maintain or service client accounts for us in order for us to be able to provide you with necessary services with respect to your account, such as:

- To help process your application to become a client or to service your account;
- To enable the provision of business services to us;
- To assist us in performing marketing services or offering services to you; and
- For investor qualification and reporting purposes.

The information provided to these service providers may include the categories of information described above. These service providers are not allowed to use your personal information for their own purposes and are contractually obligated to maintain strict confidentiality. We also limit their use of your personal information to the performance of the specific service we have requested.

Except in those specific, limited situations, without your consent, we will **not** make any disclosure of your non-public personal information to other companies who may want to sell their products or services to you. For example, we do not sell investor lists and we will not sell your name to a catalogue company.



Former Investors: Even if you are no longer a client of PDP, our Privacy Policy will continue to apply to you.

To Whom This Policy Applies: This Privacy Policy applies to individuals who obtain or have obtained service from PDP, used primarily for personal or family financial purposes.

Our Security Practices and Information Accuracy: We also take steps to safeguard client information. We restrict access to the personal and account information of our clients to our employees and agents for business purposes only. We maintain physical, electronic and procedural safeguards to guard your personal information.

We also have internal controls to keep client information as accurate and complete as we can. If you believe that any information about you is not accurate, please let us know.

Other Information: We reserve the right to change this Privacy Policy. The examples contained within this Privacy Policy are illustrations and they are not intended to be exclusive. PDP CAPITAL INVESTMENTS operates by and through PDP Management LP.

If you have any questions about our Privacy Policy, please contact Paul Pomfret at 561-832-8393.