

# Cadence Capital Management LLC

## Privacy Notice

Cadence Capital Management LLC (“Cadence” or “we”) considers customer privacy to be a fundamental aspect of its relationship with clients. Cadence is committed to maintaining the confidentiality, integrity, and security of its current, prospective and former clients’ personal information. This privacy notice applies to individuals who have an investment management account with us or who invest or have invested in the past in one of the private funds we advise. This privacy notice describes our policies and practices for collecting, disclosing, and safeguarding “nonpublic personal information”, which may include financial or other information about you.

As our client or as an investor, you are entitled to know how we protect your nonpublic personal information and how we limit its disclosure. We are providing this information to you in order that you may understand how we use your personal and financial information that you have provided to us. Specifically, we wish to tell you how we collect, share and protect your confidential information

When we use your information it is primarily to complete transactions requested by, or on behalf of, you and to provide certain required reporting to you concerning your account or investment in the private funds we advise. However, there will be other times we will use and share your information. It is Cadence’s policy not to share your information with any party for any reason other than to ensure the effective running of the day-to-day business of Cadence and as otherwise required law.

### **Information We Collect**

We collect nonpublic personal information about you from the following sources:

- Information we receive from you on your investor questionnaire and subscription agreement or other forms. This information includes, for example, name and address, Social Security or taxpayer identification number, date of birth, address, net worth, sources of your funds used to invest with us, income, employment information, wire transfer instructions, investment experience, and risk tolerance; and
- Information about your transactions with us, our affiliates or others, such as capital account balances and parties to transactions. In addition to personal information you provide to Cadence, we may also receive information about you that you authorize third parties to provide to us. We also may obtain personal information about you from third parties in order to verify your identity, and to prevent fraud.

### **Information We Disclose**

We do not disclose your nonpublic personal information to anyone, except as permitted or required by law. **This means, most importantly, that we do not sell client**

**information – whether it is your personal information or the fact that you are our client – to anyone.** Instead, we use your information primarily to complete transactions on your behalf or that you request (or to make you aware of other financial services or products that we offer.) Here are the details:

- To complete certain transactions or account changes that you request or on your behalf, it may be necessary to provide identifying information to nonaffiliated third parties. For example, if you ask Cadence to transfer funds to another financial institution, we will need to provide certain information about you to that company to complete the transaction.
- In certain instances, we may contract with nonaffiliated third parties to perform services for us and, where necessary, disclose your information (described above) to them. This may include administrators, regulatory compliance consultants, attorneys, accountants and auditors in the course of running the day-to-day business of Cadence and as otherwise required or permitted by law. We may also provide your confidential information to other service providers, such as brokers, who may have a need for the information in connection with providing services to clients. In all such cases, we provide the third party with only the information necessary to carry out its assigned responsibilities and only for that purpose. Further, we require these third parties to treat your nonpublic information confidentially.
- Finally, we will release your nonpublic information if you direct us to do so, if we are required by law to do so or in other limited circumstances permitted by law – for example, to protect your account from fraud or to comply with anti- money laundering requirements.

### **What Happens If You Close Your Account?**

If you decide to close your account(s), we will adhere to the privacy policies and procedures described in this notice.

### **Who Has Access to Your Personal Information?**

We restrict access to your nonpublic personal information to those employees who need to know that information to provide products or services to you. We maintain physical, electronic and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

### **Can you limit how we share your information?**

You cannot limit how we share your information. We need to be able to share your personal and financial information to effectively manage the day-to-day operations of Cadence and the client accounts we advise.

## **We Will Keep You Informed**

This notice replaces all previous statements of our privacy policy. As required by law, we will notify you annually of our privacy policy. We reserve the right to modify this notice at any time and will keep you informed of changes.

If you have any questions concerning any information in this privacy notice or how we collect, share or protect your information, please contact Kimberly Voss, Chief Compliance Officer, at 617.624.3500 or [kvoss@cadencecapital.com](mailto:kvoss@cadencecapital.com).

[Privacy Notice dated: July 24, 2017]