



Belle Haven Investments, L.P. – Privacy Notice

Belle Haven Investments, L.P. (“Belle Haven” or the “Firm”) is committed to protecting the confidentiality and security of the nonpublic personal information entrusted to us. This Privacy Notice describes the categories of information we collect, how such information is used and shared, and the safeguards we maintain to protect such information in accordance with applicable laws and regulations.

Belle Haven does not sell nonpublic personal information. The Firm discloses such information solely as described in this Privacy Notice, in order to service client relationships, fulfill legal and regulatory obligations, and maintain the quality and integrity of its investment advisory services.

- “Nonpublic personal information” refers to personally identifiable information collected by a financial institution in connection with establishing or maintaining a client relationship. This includes information that directly identifies an individual, as well as information that can reasonably be associated with a particular individual.
- “Sensitive customer information” refers to a subset of customer information that could be used to commit identity theft or other financial harm, including, but not limited to, Social Security numbers, account numbers, and other financial identifiers.

INFORMATION WE COLLECT

Belle Haven collects nonpublic personal information in connection with establishing and maintaining client relationships, delivering investment advisory services, and complying with applicable legal and regulatory obligations. Information is obtained through account documentation, custodial records, investment management agreements, and other materials necessary to open, service, and maintain client accounts. This information may include, but is not limited to: personal identifiers, such as name, address, telephone number, email address, Social Security number, and date of birth; financial information, including income, assets, investment objectives, and risk tolerance; and account-related information, such as account balances, holdings, transactions, transfers, and account history. The Firm may also obtain information from third-party sources, including consumer reporting agencies and credit bureaus, in order to verify identity and other client-provided information, as appropriate.

IDENTITY VERIFICATION

In accordance with applicable legal and regulatory requirements, Belle Haven verifies client identities using information provided by the client, as well as information obtained from third-party sources. If the Firm is unable to verify a client’s identity, additional documentation may be requested, and certain transactions or account activity may be delayed or restricted until verification is completed.

INFORMATION WE DISCLOSE IN SERVICING YOUR ACCOUNT

Belle Haven may disclose nonpublic personal information to affiliated and unaffiliated third-parties as necessary to service client accounts, support business operations, and comply with legal and



regulatory obligations. Such third-parties may include custodians, recordkeepers, auditors, administrators, and other service providers engaged to perform functions on behalf of the Firm. The Firm requires service providers with access to nonpublic personal information to implement and maintain appropriate safeguards and oversee such providers through a risk-based due diligence and monitoring process consistent with applicable regulatory expectations.

The Firm may also disclose information to governmental or regulatory authorities, law enforcement, or other parties as required or permitted by law, including in connection with examinations, investigations, fraud prevention, litigation, or dispute resolution. Belle Haven does not disclose nonpublic personal information to non-affiliated third-parties in a manner that would trigger an opt-out right under Regulation S-P. If the Firm's information sharing practices change, clients will be provided with appropriate notice and an opportunity to opt out, as required by applicable law. The Firm continues to protect nonpublic personal information of former clients in accordance with this Privacy Notice, including pursuant to its data retention and secure destruction practices and applicable recordkeeping requirements.

CONFIDENTIALITY AND SECURITY PROCEDURES

Belle Haven is committed to safeguarding the confidentiality and security of nonpublic personal information in accordance with applicable federal securities laws. Access to such information is limited to personnel who require it to perform their responsibilities and is subject to established internal controls. The Firm maintains a comprehensive written Information Security Program ("ISP") that is reasonably designed to: ensure the security and confidentiality of customer information; protect against anticipated threats or hazards to the security or integrity of such information; and protect against unauthorized access to or use of such information that could result in substantial harm or inconvenience to any customer. These safeguards are implemented through written policies and procedures and are supported by administrative, technical, and physical controls, including employee training, access controls, and ongoing monitoring.

If Belle Haven determines that unauthorized access to or use of sensitive customer information has occurred or is reasonably likely to have occurred, and that such incident is reasonably likely to result in substantial harm or inconvenience to a customer, the Firm will provide notice to affected individuals as soon as practicable, but no later than 30 days after becoming aware of the incident, unless notification is delayed as permitted by law enforcement or regulatory authorities.

NOTICE TO CALIFORNIA RESIDENTS

The California Consumer Privacy Act of 2018 ("CCPA") provides certain rights to California residents with respect to their personal information, including the right to request access to personal information collected about them, the right to request deletion of such information, and the right to opt out of the sale of personal information. Personal information collected by financial institutions subject to the Gramm-Leach-Bliley Act ("GLBA"), such as Belle Haven, is generally exempt from the



March 25, 2026

CCPA to the extent such information is collected, processed, and disclosed in accordance with GLBA. Belle Haven does not sell or share nonpublic personal information for direct marketing purposes. If the Firm's practices were to change, it will provide affected individuals with any required notices and opt-out rights in accordance with applicable law.

ADDITIONAL INFORMATION

Belle Haven reserves the right to amend this Privacy Notice from time to time and will provide notice of any material changes as required by applicable law. The Firm will continue to protect the nonpublic personal information of current and former clients in accordance with this Privacy Notice and applicable regulatory requirements.

If you have any questions regarding this Privacy Notice or would like additional information, please contact Belle Haven at (914) 816-4633 or compliance@bellehaven.com.