



Belle Haven Investments, L.P. – Privacy Notice

At Belle Haven Investments, L.P. (“Belle Haven”, or the “Firm”), we understand the importance of safeguarding the privacy and security of the nonpublic personal information we collect about you. This Privacy Notice is designed to provide you with a clear understanding of the Firm’s Privacy Policy, including the types of information we collect, how we share it, and the measures we take to protect your nonpublic personal information, as required or permitted by law, to help us serve your financial needs.

Belle Haven does not sell your nonpublic personal information to any third party. We will only share such information as outlined in this Notice. “Nonpublic personal information” refers to personally identifiable information that a financial institution collects about an individual in the course of providing investment advisory services. This information, either alone or in combination with other data, may relate to, describe, or be reasonably associated with, or linked, directly or indirectly, to an individual.

INFORMATION WE COLLECT

We collect nonpublic personal information to effectively serve your financial needs and ensure compliance with our legal and regulatory obligations. When you establish an investment advisory or brokerage relationship with us, we may collect necessary information through account opening documentation, custodial applications, investment management agreements, and other forms or documents associated with establishing your relationship with the Firm. This may include details such as your name, address, phone number, email, social security number, age, income, assets, and portfolio objectives. In the course of servicing and administering your account, we also collect information regarding your transactions, including securities bought and sold, account balances, transfers, and account history. To verify certain information, such as your identity, income, or assets, we may utilize third-party sources, including consumer reporting agencies and credit bureaus.

IDENTITY VERIFICATION

The Firm will verify your identity based on the information you provide, in conjunction with third-party sources, as described above. If the Firm is unable to verify your identity, we may request additional information from you to complete the verification process before any transactions in your account can be executed.

INFORMATION WE DISCLOSE IN SERVICING YOUR ACCOUNT

In the course of servicing your account, we may disclose or share your nonpublic personal information for business purposes with our affiliated broker-dealer and non-affiliated third-parties that provide accounting, custodial, recordkeeping, or administrative services related to your account. We may also disclose such information to governmental regulatory authorities upon request, to law enforcement pursuant to a legal subpoena, or in connection with disputes, litigation, or fraud prevention, as



permitted by law. Belle Haven does not sell your nonpublic personal information to any third-party. If this policy changes, the Firm will provide you with an "Opt-Out" Notice prior to disclosing your nonpublic personal information, in accordance with Regulation S-P. In the event that you close your account or if the account becomes inactive, the Firm will continue to adhere to the privacy policies and practices outlined herein, including, but not limited to, our data retention and destruction obligations.

CONFIDENTIALITY AND SECURITY PROCEDURES

Belle Haven deeply values the trust you have placed in us, and we take extensive measures to protect your information. Access to your nonpublic personal information is strictly limited to those Firm employees who require it to provide investment advisory services to you. We emphasize the importance of confidentiality through ongoing training, robust internal controls, and requiring strict adherence to the Firm's Privacy Policy. In compliance with Regulation S-P, Belle Haven has implemented written information security policies and procedures that establish administrative, technical, and physical safeguards to protect customer records and nonpublic personal information. These safeguards are designed to meet or exceed applicable federal and state standards to prevent unauthorized access to your records and protect your nonpublic personal information. We periodically review and update our information security policies and procedures to ensure the continued protection of your privacy and to uphold our commitment to conducting business in a manner that aligns with your best interests.

NOTICE TO CALIFORNIA RESIDENTS

The California Consumer Privacy Act of 2018 ("CCPA") grants residents of California certain additional rights regarding their personal information. These rights include, but are not limited to, the right to request access to the personal information we collect, the right to request the deletion of such information, and the right to opt-out of the sale of personal information. However, it is important to note that the CCPA does not apply to certain personal information that is collected by financial institutions that are subject to the Gramm-Leach-Bliley Act ("GLBA"). Belle Haven is subject to the GLBA, which establishes specific guidelines for the collection, use, and sharing of nonpublic personal information. As such, Belle Haven does not sell or share your nonpublic personal information for direct marketing purposes. We are committed to maintaining the confidentiality and security of your personal information, as required by GLBA. In the event that our policies change regarding the sharing or sale of your nonpublic personal information, we will provide you with an "Opt-Out" Notice prior to any such disclosure, in compliance with the CCPA. This notice will inform you of your right to opt-out and provide instructions on how to exercise this right.

For any questions or concerns regarding this Notice or other privacy-related matters, or to request a copy of our Privacy Policy, please contact us at 914-816-4633; or compliance@bellehaven.com.