



Belle Haven Investments, L.P. – Privacy Notice

At Belle Haven Investments, L.P. (“Belle Haven”, or the “Firm”), we recognize that protecting the privacy and security of the confidential personal information we collect about you is an important responsibility. This Notice was designed to help you understand the Firm’s Privacy Policy, how we collect, share and protect your personal information, as required or permitted by law, in order to help us serve your financial needs.

Belle Haven will not sell your nonpublic personal information to anyone, and only shares such information with others as stated in this Notice. “Nonpublic personal information” is personally identifiable financial information that a financial institution collects about an individual in connection with providing investment management services. As an example, nonpublic personal information includes information regarding your income, credit relationships, and investment history.

INFORMATION WE COLLECT

We collect nonpublic personal information to help us serve your financial needs and fulfill our legal and regulatory compliance obligations. When you open an investment advisory or brokerage relationship with us, we may collect information through account opening documentation and forms that are necessary in order to provide investment advisory services, such as name, address, social security number, age, income, assets and portfolio objectives. While servicing and administering your account(s), we collect information regarding your transactions, such as securities bought and sold, account balances, transfers and account history. We may verify through use of third-parties information regarding your identity, income or assets, such as consumer reporting agencies and credit bureaus.

IDENTITY VERIFICATION

The Firm will verify your identity from the information provided to us in accordance with such third-party sources described above. If the Firm is unable to verify your identity, we may require additional information from you for verification purposes before any transactions in your account can be processed.

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, to our affiliated broker-dealer and non-affiliated third-parties that perform accounting, custodial, recordkeeping, or administrative services related to the servicing of your account; to governmental regulatory authorities upon request; to law enforcement pursuant to a legal subpoena, dispute, litigation or fraud prevention; or as otherwise permitted by law. Belle Haven does not sell your nonpublic personal information to anyone. Should this change, the Firm will provide you with an “Opt-Out” Notice prior to disclosing your nonpublic personal information, in accordance with Regulation S-P. Should you decide to close your account, or such account becomes inactive, the Firm will continue to adhere to the privacy policies and practices described herein, including, but not limited to our data retention and destruction obligations.



March 2021

CONFIDENTIALITY AND SECURITY PROCEDURES

Belle Haven greatly appreciates the trust that you have placed in us, and we take great measures to safeguard your information. We restrict access to your nonpublic personal information to only those Firm employees who need to know such information to provide investment management services to you. We emphasize the importance of confidentiality through training, maintaining robust internal controls, and requiring strict adherence to the Firm's Privacy Policy. In accordance with Regulation S-P, Belle Haven has implemented written policies and procedures that address administrative, technical, and physical safeguards for the protection of customer records and nonpublic personal information. These Firm physical, electronic, and procedural safeguards comply with applicable federal and state standards to guard your nonpublic personal information, and to mitigate unauthorized access to your records. We will update our policies and procedures where necessary to ensure that your privacy is maintained, and that we conduct our business in a way that fulfills our commitment to you.

The California Consumer Privacy Act of 2018 ("CCPA") gives residents of California additional rights with respect to certain personal information that we may collect. CCPA does not apply to personal information collected by financial institutions subject to the Gramm-Leach-Bliley Act ("GLBA"). Belle Haven is subject to GLBA, and does not sell or share your nonpublic personal information for direct marketing purposes to anyone. Should this change, the Firm will provide you with an "Opt-Out" Notice prior to disclosing your nonpublic personal information, in accordance with CCPA.

For additional questions or comments about this Privacy Notice or other privacy-related matters, or to request a copy of our Privacy Policy, please contact us by:

Phone: 914-816-4633; or

E-Mail: service@bellehaven.com