

Privacy Policy

This Privacy Policy explains the manner in which Quantam S.A. (Quantam) collects, utilizes and maintains non-public personal information about Investors, as required under US Federal Law. Quantam is committed to protecting your privacy and maintaining the confidentiality and security of your personal information.

Quantam SA is committed to protecting your privacy and maintaining the confidentiality and security of your personal information. Any personal information processed by the Investment Manager is controlled by the Investment Manager and he is the data controller of your personal information.

Quantam SA Privacy Policy is compliant with the manner in which the Investment Manager collects, utilizes and maintains non-public personal information as required under the General Data Protection Regulation (EU) 2016/679 ("GDPR"). This EU Privacy Policy applies to your investment or potential investment in our Funds.

The Investors collectively refer to the investors of pooled investment vehicles advised by Quantam (each individually a "Fund" and collectively, the "Funds") and to the investors of the respective managed accounts advised by Quantam (each individually a "Managed Account" and collectively, the "Managed Accounts").

Collection of Investor Information

Quantam collects personal information about Investors from the following sources:

1. Subscription forms, investor questionnaires, account forms, and other information provided by Investors in writing, in person, by telephone, electronically or by any other means. This information includes name, address, social security number and/or federal tax identification number, employment information, and financial and investment qualifications;
2. Transactions within each Fund or Managed Account, including account balances, investments, withdrawals/redemptions and fees;
3. Information about Investors from financial institutions or service providers with whom the Funds or Managed Accounts have relationships and/or parties who are authorized by an Investor to provide information to Quantam.

Disclosure of Non-public Personal Information

Quantam may share non-public personal information about Investors or potential Investors with affiliates, as permitted by law. Quantam does not disclose non-public personal information about Investors or potential Investors to non-affiliated third parties, except as permitted by law. For example, Quantam may share non-public personal information about Investors, without the Investor's consent, with affiliated and non-affiliated parties in the following situations, among others:

1. 1. In connection with the operations of Quantam, the Funds and Managed Accounts it advises, with Quantam's brokers, attorneys, accountants, auditors, administrators or other service providers;
2. 2. To respond to a subpoena or court order, judicial process or regulatory inquiry;
3. 3. To protect or defend against fraud unauthorized transactions (such as money laundering violations), lawsuits, claims or other liabilities.

Quantam also may share non-public personal information about Investors as directed by an Investor or with Investor's consent.

Former Customers and Investors

The Privacy Policy applies also to former Investors.

Protection of Investor Information

Quantam maintains physical, electronic and procedural safeguards that comply with US federal standards to protect customer information. Quantam restricts access to the personal and account information of Investors to those employees who need to know that information in the course of their job responsibilities.

Further Information

Quantam reserves the right to change this Privacy Policy at any time. The examples contained within this Policy are illustrations and are not intended to be exclusive. This Policy complies with US Federal Law regarding privacy. You may have additional rights under other foreign or domestic laws that may apply to you.
