

## **Privacy Policy**

Omega Advisers, LLC (the “**Investment Manager**”) has adopted a privacy policy that explains the manner in which it collects, utilizes and maintains nonpublic personal information about its clients as required under federal legislation. The Investment Manager understands the value of the privacy of the client. The Investment Manager holds the security of the client’s personal data in the highest regard. This privacy policy only applies to nonpublic information belonging to clients.

### **Collection of Investor Information**

Personal information is collected about clients through written questionnaires, during face-to-face meetings and telephone calls. Therefore, clients provide personal information in writing, in person, by telephone, and/or electronically. Such information may include, but is not limited to, name, address(es), nationality, tax identification number, tax residence, government issued photo identification to include driver’s license, passport(s) or other official government identification card, financial stature and investment qualifications.

### **Disclosure of Nonpublic Personal Information**

The Investment Manager and/or its affiliates does not sell or rent client information. Investment Manager will not disclose any nonpublic personal information about the client to third parties unless it is compelled to do so by law, or if the Investment Manager is given permission by the client to do so. The Investment Manager does not disclose nonpublic personal information about individuals to nonaffiliated third parties or to affiliated entities, except in connection with transactions undertaken at the client’s request or on its behalf. For example, the Investment Manager may share nonpublic personal information about a client in the following situations:

- To service providers in connection with the administration and servicing of the client’s account(s), which may include attorneys, accountants, auditors and other professionals.
- The Investment Manager may also share information in connection with the servicing or processing of client transactions;
- To affiliated companies in order to provide the client with ongoing professional advice and assistance with respect to the products and services the client may have purchased

through the Investment Manager and to introduce a client to other products and services that may be of value or interest to a client;

- To respond to a subpoena or court order, judicial process or regulatory authorities;
- To protect against fraud, unauthorized transactions (such as money laundering), claims or other liabilities; and
- Upon written consent of a client to release such information, including authorization to disclose such information to persons acting in a fiduciary or representative capacity on behalf of the client.
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**Protection of Investor Information**

The Investment Manager’s privacy policy is to require that all employees, financial professionals and companies providing services on its behalf keep client information confidential. The Investment Manager restricts access to client’s personal and account information to those employees who need to know that information to provide products or services to the client. The Investment Manager employs policies and procedures to:

- Ensure the security and confidentiality of client records;
- Protect against anticipated threats to the security or integrity of client records; and
- Protect against unauthorized access to client records that could result in substantial harm or inconvenience to any client.

The Investment Manager maintains physical and procedural safeguards to guard client’s nonpublic personal information. Third parties with whom the Investment Manager shares client information must agree to follow appropriate standards of security and confidentiality. The Investment Manager is required by Federal Law to obtain a client’s written consent to release nonpublic personal Information to any **non-affiliated** third party. A Non-affiliated third party is any person or entity other than Investment Manager, its employee(s), or an affiliate.

“Opt-In” - Client declaration of approval to share client NPI with unaffiliated third parties.

CLIENT NAME \_\_\_\_\_

Address \_\_\_\_\_

City, State ZIP \_\_\_\_\_

Client Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**Omega Advisers, LLC**  
MJ8218 Mega Massey Building  
Choc Estate Choc Bay, Castries LC02501  
Saint Lucia  
Telephone: 1 (646) 233-2206

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The Investment Manager's privacy policy applies to both current and former clients. The Investment Manager, upon written consent, may disclose nonpublic personal information about former clients to the same extent as for current ones.

### **Changes to Privacy Policy**

The Investment Manager may make changes to the privacy policy in the future. The Investment Manager will distribute a revised privacy policy describing the changes to affected clients.