

OPEN FIELD CAPITAL LLC

PRIVACY POLICY

Effective: 6th December, 2023

In order to comply with the disclosure requirements of Regulation S-P, the Chief Compliance Officer shall cause the following Privacy Policy to be distributed to all new clients and to all existing clients no less often than annually. This Privacy Policy is also posted on our website in order to notify website users of our consumer personal data privacy practices.

Open Field Capital LLC (“OFC,” “we” or “us”) has a policy of protecting the confidentiality and security of information we collect and maintain on behalf of our clients and former clients. We consider preserving privacy to be fundamental to our relationship with our clients. In the course of providing investment management services, we necessarily collect and maintain information that identifies, describes or relates to you or can be reasonably associated with or linked to you (“personal information”). We will not share personal information with non-affiliated third parties without your consent, except as described below.

What Personal Information Do We Collect? We receive personal information about you, your organization and your portfolio from your investment management agreements, subscription agreements or other account application forms. We collect and maintain personal information about your transactions and your portfolio. We also gain access to personal information from our interaction with you on the telephone, in person or via e-mail. The categories of personal information that we collect includes; identifiers, such as first and last name, address, e-mail address; telephone number, social security number and internet protocol address; and commercial information, such as assets, liabilities, investment preferences and investment activity.

What Personal Information Do We Disclose? We limit the collection and use of personal information to the minimum that is required by us in order to deliver superior service. We do not disclose any personal information about our current or former clients, except in the following instances:

- as necessary to process a transaction;
- to service providers, including investment management software as a service providers; to contractors, including accountants and proxy services; or
- to regulatory agencies and as required by law.

The organizations that we provide your personal information to act on our behalf and use the personal information only to provide the services that we have asked them to perform for you and us. As emphasized above, we do not provide personal information to outside companies except in furtherance of our business relationship with you, or as otherwise permitted by law.

How Do We Protect Your Personal Information? We restrict access to your personal information to only those personnel who need access to such information in order to provide services to you and perform their designated functions. Our personnel are required to protect the confidentiality of personal information and to comply with our established policies. Personnel

who violate our Privacy Policy will be subject to disciplinary action. We also maintain physical, electronic, and procedural safeguards that comply with industry standards to guard your personal information.

How Can You Review and Request Changes to your Personal Information? If you wish to review and request changes to any of your personal information that is collected on our website, please send an e-mail with your request to: james.stableford@ofcap.com

How Will You Know About Changes to Our Privacy Policy? We may make material changes to our Privacy Policy from time to time, in our sole discretion. When we do so, we will post the new Privacy Policy on our website with its effective date. You should consult this Privacy Policy regularly for any changes. Continued use of services following posting of such changes constitutes your acknowledgement of such changes and agreement to be bound by the changes. If you do not agree, you should immediately discontinue your use of our website and services.

Do we respond to “Do Not Track” signals? Our website does not recognize and respond to “Do Not Track” or other “opt-out” preference signals.

May Other Parties Collect Personal Information from Our Website? We do not share your personal information with third parties for cross-context behavioral advertising purposes.

Do We Collect Personal Information from Children? We do not direct our website toward or knowingly collect any personal information from children under the age of 13. If you are under the age of 13, you may not use our website unless you provide us with your parent or guardian’s name and contact information and they consent to your use of our website. If you are a parent or guardian and think that your child provided personal information on our website, please contact us immediately and, if you request, we will remove such information from our records.

Rights of California Residents. If you reside in California and have provided us with your personal information, you may request information about our disclosures of certain categories of personal information to third parties for their direct marketing purposes. Such requests must include your name, street address, city, state, and zip code, and be submitted to us at one of the following addresses: james.stableford@ofcap.com with the subject “California Shine The Light Request” or Open Field Capital LLC, 1140 Ave of the Americas, 9th Floor, New York, NY 10036 Attention: Shine the Light. Within thirty days of receiving such a request, we will provide a list of the categories of personal information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted to addresses other than the addresses specified in this paragraph.

Rights of California Residents Under the Age of 18. If you are a California resident under the age of 18, and a user of our platform, California Business and Professions Code Section 22581 permits you to request and obtain removal of content or information that you have publicly posted. To make such a request, please send an email with a detailed description of the specific content or information to james.stableford@ofcap.com. Please be aware that such a request does

not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

Consent. By using our platform, you hereby consent to our Privacy Policy and agree to its Terms of Service.

Further Information. Any examples contained within this Privacy Policy are illustrations and are not intended to be exclusive. Should you have any questions regarding this Policy, please contact OFC's Chief Compliance Officer at +44 7916 261156. The Policy and procedures will be reviewed on a periodic basis and updated if necessary.