



## **Radiant Global Investors LLC Privacy Policy**

### **General**

Investment advisers operate under a fiduciary relationship with their clients. As a result of this relationship, employees regularly obtain access to confidential client information. Radiant Global Investors LLC ("Radiant" or the "Firm") employees are prohibited from disclosing confidential client information to any person without the express written consent of the client.

In addition, Radiant will restrict access to clients' non-personal financial information to those employees who need to know such information in order to provide products or services to clients. Radiant will maintain physical, electronic, and procedural safeguards that comply with federal standards to safeguard each client's personal financial information. If received, hard copies of client personal financial information will be maintained in Radiant's central files and, in the back-up files maintained pursuant to Radiant's Business Continuity Plan (the "BCP"), as provided in the Compliance Manual, and will be secured (locked) after normal business hours. Electronic access to client personal financial information will be restricted to the person(s) responsible for handling the account through Radiant's local area network (LAN) and pursuant to the BCP. Electronic LAN access and BCP access will also be available to such person(s) supervisor(s) and the CCO.

Misuse of confidential information may result in civil or criminal liability, or in sanctions or penalties against Radiant, and/or the individual responsible for misusing such information.

### **Regulation S-P**

Regulation S-P requires Radiant to make disclosures to, and to safeguard information that it collects from its individual clients. Regulation S-P also requires Radiant to adopt policies and procedures reasonably designed to (i) ensure the confidentiality of client records and information; (ii) protect against any anticipated threats or hazards to the security of client records and information; and (iii) protect against unauthorized access or use of client records or information that could result in "substantial harm or inconvenience" to any client. The privacy provisions of Regulation S-P will apply to information that is "nonpublic personal information." Although Regulation S-P does not apply to clients that are not individuals, such as pooled investment vehicles, Radiant may be subject to substantially similar privacy rules adopted by the Federal Trade Commission with regard to such pooled investment vehicles.



## 1. Nonpublic Information

Under Regulation S-P, nonpublic information includes “personally identifiable financial information” and any list, description, or grouping that is derived from personally identifiable financial information. Regulation S-P “does not apply to information about companies or about individuals who obtain financial products or services primarily for business, commercial or agricultural purposes.”

Personal identifiable financial information is defined to include three (3) categories of information:

### (a) Information Supplied by Client

Any information that is provided by a client or prospective client to Radiant in order to obtain a financial product or service. This would include information or material given to Radiant when entering into an investment advisory agreement.

### (b) Information Resulting from Transaction

Any information that results from a transaction with the client or any services performed for the client. This category would include information about account balances, securities positions, or financial products purchased or sold through a broker-dealer.

### (c) Information Obtained in Providing Products or Services

Any information obtained by Radiant from a consumer report or other outside source which is used by Radiant to verify information that a client or prospective client has given on an application for advisory services.

## 2. Regulation S-P Requirements

### (a) Under Regulation S-P, Radiant is required to:

- (i) Adopt policies and procedures to safeguard customer information;
- (ii) Issue an initial and annual privacy notice; and
- (iii) Issue an opt-out notice if Radiant shares information with non-affiliated third parties.

### (b) Regulation S-P requires disclosure of the types of nonpublic personal information Radiant collects and whether it shares information with affiliates or non-affiliates. Specifically, Radiant’s privacy notices must contain the information listed below, unless the disclosure does not apply to Radiant’s practices:

- (i) Categories of nonpublic information collected;
- (ii) Categories of nonpublic personal information disclosed, if applicable;



- (iii) Categories of affiliates and non-affiliated third parties to whom information is disclosed; and
- (iv) Categories of nonpublic personal information disclosed about former customers and the categories to whom the information is disclosed.

**Delivery of Initial Privacy Notice**

On or before (i) an individual person's execution of an investment advisory agreement with Radiant, (for a separate advisory account, by way of example and not limitation), or (ii) an investor's investment in the Private Funds, is accepted, Radiant shall provide such individual advisory client or investor with an initial notice of the privacy policies and procedures of Radiant and/or of the Private Funds, as the case may be.

**Delivery of Annual Privacy Notice**

Radiant shall provide its individual investment advisory clients and investors with an annual notice of the privacy policies and procedures of Radiant and/or the Radiant Private Funds, as the case may be.