

Venture Capital Invest, GmbH

PRIVACY POLICY

Venture Capital Invest, GmbH (the "Company" or "we" or "us") is committed to protecting the confidentiality and security of information we collect about our customers. **We will not share nonpublic information about you ("Information") with third parties without your consent**, except for the specific purposes described below or as required by law. The purpose of this notice is to tell clients how we handle, protect and limit the use of the Information that we collect in order to service and administer your business with the Company.

INFORMATION THAT WE COLLECT: We limit the collection and use of Information to the minimum we require to deliver superior service to you. Such service includes processing transactions requested by you and administering our business. We get most Information directly from you when you apply for, access and use financial products and services offered by the Company and its affiliate, Primary-Capital PLC, whether in person, by telephone or electronically. Such Information may include the following:

- (i) Information received from you on subscription documents and other forms (for example, name, address, social security number, telephone and fax numbers, assets and income);
- (ii) Information about your transactions with us (for example, account activity and balances); and
- (iii) Information we receive about you from other sources (for example, from public sources used to verify Information regarding your finances, employment, avocations or other personal characteristics).

CONFIDENTIALITY AND SECURITY: The security of your Information is our priority. We protect this Information by maintaining physical, electronic and procedural safeguards that comply with applicable laws and federal regulations. We train our employees in the proper handling of this Information. They may access your Information only when there is an appropriate reason to do so, such as to service and administer your business with the Company. It is the Company's policy to require all third parties, other than Hastings, that are to receive any Information to sign strict confidentiality agreements. These policies are strictly enforced.

DISCLOSURE OF INFORMATION: We do not disclose Information about our clients or former clients except as required by law, including disclosures made with your consent or as necessary to process and service your account, to protect against fraud, or to protect the security or confidentiality of our records. In addition, we may disclose Information to affiliated and non-affiliated third parties that provide services necessary to effect a transaction that you request or to service your account, such as prime brokers, accountants, auditors, banks, attorneys or administrators. Finally, we may be required to disclose Information to government agencies, courts, parties to lawsuits or regulators in response to subpoenas; in such cases, we share only the information that we are required or authorized to share. Except in those specific, limited situations, we will not make any disclosures of Information to other companies without your consent.

FORMER CUSTOMERS: If you terminate your relationship with the Company, we will continue to adhere to the policies and practices described in this notice.

FURTHER INFORMATION: This notice replaces all previous statements of our customer privacy policy, and may be amended at any time. We will provide you with annual reminders of our policies and with revised policies if there are any changes in how we handle your Information. The examples contained within this Privacy Policy are illustrations and they are not intended to be exclusive. This notice complies with federal law and SEC regulations regarding privacy. You may have additional rights under other foreign or domestic laws that may apply to you.

CONTACT INFORMATION: If you have any questions about this Privacy Policy, please contact our company, General Counsel and Chief Compliance Officer.