



Privacy Shield Notice

Please be advised that Cortland Capital Market Services LLC, Alter Domus (US) LLC, Alter Domus (CA) Inc., and AD Carta, LLC, all entities within the Alter Domus Group (collectively, "Alter Domus US"), may collect and transfer certain personal data outside of the EU, United Kingdom (UK) and Switzerland to the United States for processing and storage as part of its provision of services to clients of its subsidiaries located in the EU, particularly for the purpose of performing "know your customer" identity verification and "anti-money laundering" compliance reviews. In connection with same, Alter Domus US provides said information to third party vendors which provide identity verification web-based programs. These vendors are subject to confidentiality and data security obligations in their access of said personal data. These vendors would be responsible to Alter Domus US for any misuse or unauthorized access of this personal data. Alter Domus US has in place data security and recovery systems and policies that are at or higher than industry standard for the protection of such personal data.

Your personal data may also be disclosed in response to lawful requests by public authorities or by court order, which enforcement authority has jurisdiction over Alter Domus US's compliance with the Framework.

Alter Domus US is committed to complying with the EU-U.S. Privacy Shield Framework and Swiss-U.S. Privacy Shield Framework (the "Framework") as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union to the United States, UK and Switzerland. When doing so, Alter Domus processes personal data pursuant to established safeguards such as the use of EU Standard Contractual Clauses.

Alter Domus US has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy with regard to Privacy Shield and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/>.

In compliance with the Privacy Shield Principles, Alter Domus US commits to resolve complaints about our collection or use of your personal information. Residents of the European Union, UK and Switzerland with inquiries or complaints regarding our Privacy Shield policy should first contact David J. Evans, Group Data Protection Officer, at dataprotection@alterdomus.com. Alter Domus US has further committed to refer unresolved Privacy Shield complaints to the American Arbitration Association, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not resolved your complaint, please contact or visit <http://go.adr.org/privacyshield.html> for more information or to file a complaint. There are pre-arbitration requirements you must meet. For more information on same, visit privacyshield.gov. The services of the American Arbitration Association are provided at no cost to you.

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A copy of Alter Domus's Privacy Shield Policy can be downloaded here: [AD US - EU Privacy Shield Policy](#)