

Dara Capital US, Inc.
Annual Notice of Privacy Practices

Duty of Confidentiality

At Dara Capital US, Inc. (“Dara Capital”), we are committed to safeguarding your personal information. U.S. federal law requires us to tell you how Dara Capital collects, shares, and protects your personal information. This notice describes:

- The types of personal information we may collect about you
- The purpose for which we use the information collected
- The circumstances in which we may share the information collected
- The steps we take to safeguard the information to protect your privacy

Please read this notice carefully to understand how Dara Capital accomplishes the foregoing. We distribute this notice annually and when significant changes are made.

Why and How Dara Capital Collects Personal Information

We collect personal information about you in order to enable us to provide services to you and conduct our everyday business. We collect this information as follows: (i) from applications and other forms that you submit to us; (ii) in conversations you may have with us; (iii) through your transactions with us; or (iv) in correspondence that you send to us. These sources provide us with information including without limitation your name, address, e-mail address, telephone number, date of birth, Social Security number or other tax identification number, occupation, financial goals, assets and income.

How Dara Capital Safeguards Your Personal Information and Protects your Privacy

Dara Capital is committed to protecting the privacy and confidentiality of your personal information. Only those employees, managers, agents or advisers of Dara Capital who have a professional or business reason to have access to personal information to perform their jobs are authorized to use your personal information. They may need access to your personal information in order to conduct business on your behalf, service you, help you pursue your financial objectives, and to conduct Dara Capital’s business. Employees who have access to your personal information are required to maintain and protect the confidentiality of that information and follow established procedures, as set forth in Dara Capital’s compliance manual. We maintain physical, electronic and procedural safeguards to protect your personal information and to comply with applicable laws, rules and regulations. Your personal data may be stored both in hard copy and/or electronically. At all times your personal data is treated as confidential and sensitive.

Dara Capital will provide you with notice of changes in our information sharing practices. If at any time in the future, Dara Capital finds it necessary to disclose any of your personal information in a way that is inconsistent with Dara Capital's policy, we will give you advance notice of the proposed changes so you will have the opportunity to opt out of such disclosure if possible.

Dara Capital will maintain personally identifiable information about you during the time you are a client, and for the required time thereafter that such records are required to be maintained by U.S. federal and state securities laws. After such a required period of record retention, all such information may be destroyed.

Why and How Dara Capital Shares Information with Its Affiliate

We may share your personal information as described above with our affiliate as required or permitted by applicable law. Our affiliate is Dara Capital AG, a company incorporated under Swiss law, which controls us. Dara Capital AG is subject to Swiss Secrecy Laws.

We may share with our affiliate your name, contact information and information about your transactions with us so that you can be efficiently serviced and we can conduct our everyday business. We will not, however, use your personal information for marketing purposes.

Why and How Dara Capital Shares Information with Non-affiliated Third Parties

All of your personal information shall be kept confidential by Dara Capital unless such personal information is generally known or otherwise publicly available. Dara Capital does not and will not rent or sell your personal information. Furthermore, we will not use your personal information for marketing purposes. However, Dara Capital may share your personal information with companies that we hire to perform services for us, such as vendors that provide computer software maintenance and development, and who need access to your personal non-public information in order to provide the services for which they have been contracted. Such non-affiliated third parties are contractually bound to confidentiality before being provided access to your personal information.

Furthermore, Dara Capital may share your personal information if such sharing is required in connection with the performance of the advisory agreement concluded between you and Dara Capital (including to subadvisors or managers), or to the extent Dara Capital may be required to disclose such information pursuant to law or legal process.

In the event that Dara Capital is requested or required by law, regulation, supervisory authority or other applicable judicial or governmental order to disclose any personal information, Dara Capital will, so far as it is lawful (or otherwise not in breach of any regulation, supervisory authority or other applicable judicial or governmental order) and practical to do so prior to such disclosure, promptly notify you of such requirement with a view to providing you with an opportunity to contest such disclosure or otherwise to agree to the timing and content of such disclosure.

Dara Capital's Website

Information contained on our website is for information purposes only and does not constitute any form of promotion, offer, recommendation or solicitation to purchase or sell any investment instruments or securities, effect any transaction or enter into any other legal act. Furthermore, no information published on our website constitutes financial, legal, tax or other advice, nor should any investment or any other decision be made solely based on this information.

Our website contains an email link, where you may provide information about yourself ("personal information" such as your name, address, email address, and telephone number(s)). You have no obligation to use this feature on our website. If you choose to provide us with personal information by submitting an email from the link on our website, we may use that information to contact you back and to improve subsequent communications with you, if any.

Information transmitted on the internet is not secure and should not be considered confidential. The submission of an email from our website does not constitute advisory-client communication and does not create an advisory-client relationship.

If you have any questions, please write an email to info@daracapital.com.

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