

Double Eagle Capital Management, LP Privacy Policy

Statement of Policy

Your privacy is very important to us.

Double Eagle Capital Management LP (“DEC”) is committed to protecting the confidentiality and security of consumer, customer and former customer¹ information that it collects and will disclose such information only in accordance with Regulation S-P, Cayman Islands Data Protection Law, 2017 (the “DPL”), any other applicable law, rules and regulations and this Privacy Policy. Together Regulation S-P and the DPL limit the circumstances under which an adviser may disclose nonpublic personal information about a client to other persons and requires an adviser to disclose to all of its clients the adviser’s privacy policies. DEC has implemented the following Privacy Policy (“Privacy Policy”) and Program for Protecting Client Information (the “Program”) to comply with Regulation S-P and the DPL.

In providing financial services and products to you, and through your associated interactions with us (including any subscription (whether past, present or future), including the recording of electronic communications or phone calls where applicable) or by virtue of you otherwise providing us with personal information on individuals connected with you as an investor (for example directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners or agents), we collect certain nonpublic personal information about our clients and investors in our clients. You will provide us with certain personal information which constitutes personal data within the meaning of the DPL (“Investor Data”). We may also obtain Investor Data from other public sources.

If you are a natural person, this Privacy Policy will affect you directly. If you are a corporate investor (including, for these purposes, legal arrangements such as trusts or exempted limited partnerships) that provides us with Investor Data on individuals connected to you for any reason in relation to your investment with us, this will be relevant for those individuals, and you should transmit this document to such individuals or otherwise advise them of its content.

In our use of Investor Data, the Company will be characterized as a “data controller” for the purposes of the DPL. The Company’s affiliates and delegates may act as “data processors” for the purposes of the DPL. These terms will be used throughout this Privacy Policy.

Our policy is to keep this information confidential and strictly safeguarded, and to use or disclose it only as needed to provide services to our clients and investors in our clients, or as permitted by law. Protecting the privacy of our current and former clients and investors in our clients is important to us.

Information DEC Collects

The Investor Data we collect about our clients and investors in our clients includes information clients provide when engaging DEC to provide advisory services or information investors provide when they invest in one of our clients. Investor Data includes, but may not be limited to: name, residential address, email address, social security number, contact details, corporate contact information, signature, nationality, place of birth, date of birth, tax identification, credit history, correspondence records, passport number, bank account details, source of funds details and details relating to your investment activity. As is necessary in the course of our business relationships, we collect this information from various documents and forms delivered to us, from

¹ For purposes of this notice, the term “customer” or “customers” includes both past and present customers who have provided personal information but have not become our customers.

conversations we have with clients or investors in our clients and from the transactions we process for clients or investors in our clients.

Additionally, SS&C Technologies, Inc. (the "Administrator"), may use Investor Data, for example to provide its services to the Company or to discharge the legal or regulatory requirements that apply directly to it or in respect of which the Company relies upon the Administrator, but such use of Investor Data by the Administrator will always be compatible with at least one of the aforementioned purposes for which we process Investor Data.

Further explanation regarding how the Administrator may handle Investor Data is set out in its privacy notice, which is available at <https://www.ssctech.com/about-us/privacy>.

Should we wish to use Investor Data for other specific purposes (including, if applicable, any purpose that requires your consent), we will contact you.

Information DEC Discloses

We may disclose Investor Data only to our affiliates, if any, to third parties hired by DEC to provide products and services to clients or investors in our clients, as specifically authorized by clients or investors in our clients, or as otherwise allowed or required by law. In order to service our client accounts and effect transactions for these accounts, we may provide Investor Data to our affiliates and to firms that assist us and have a need for such information, such as an administrator.

We do not otherwise provide Investor Data to outside firms, organizations or individuals, except to our attorneys, accountants and auditors as permitted by law. These sharing practices are consistent with Federal privacy and related laws as well as the DPL. These current and former third parties are required (by contract and in many cases by law) to maintain the confidentiality of Investor Data and not to use it other than for such purposes.

We may also disclose personal information with non-affiliated entities and regulatory authorities as permitted by applicable law. For example, we may disclose such information to cooperate with regulatory authorities and law enforcement agencies and as necessary to protect our rights and property.

In certain circumstances we and/or our authorized affiliates or delegates may be legally obliged to share Investor Data and other information with respect to your interest in the Company with the relevant regulatory authorities such as the Cayman Islands Monetary Authority or the Tax Information Authority. They, in turn, may exchange this information with foreign authorities, including tax authorities.

We anticipate disclosing Investor Data to the following parties who provide services to the Company and their respective affiliates (which may include certain entities located outside the Cayman Islands or the European Economic Area), who will process your personal data on our behalf:

- (i) the Administrator; and
- (ii) Stuarts Corporate Services Ltd.

We do not sell Investor Data to anyone.

How DEC Safeguards Information

Our firm, and the service providers we hire to provide services to clients and investors in our clients, has procedures in place to safeguard Investor Data and we are contractually obligated to maintain strict

confidentiality, to safeguard Investor Data and to use Investor Data only for the intended purpose and to abide by applicable law. We limit use of Investor Data to the performance of the specific service requested.

Only our staff with a valid business reason has access to Investor Data through password-protected user access to our computer files, and these persons are educated on the importance of maintaining the confidentiality and security of Investor Data. They are required to abide by our information handling practices. We educate our employees on the importance of protecting the privacy and security of Investor Data. In addition, we require third parties with whom we share Investor Data to: maintain policies and procedures designed to assure only appropriate access to, and use of information about, our customers; and maintain physical, electronic, and procedural safeguards that comply with federal and DPL standards to guard Investor Data.

We shall notify you of any Investor Data breach that is reasonably likely to result in a risk to the interests, fundamental rights or freedoms of either you or those data subjects to whom the relevant Investor Data relates.

Last Updated: January 25, 2024