



## **Privacy Notice as of August 2018**

Blueshift Holdings, LP (comprised of a number of companies under common control, including but not limited to, Blueshift Asset Management, LLC, Blueshift ARC, LLC, and their affiliated companies) and the Blueshift Funds (collectively, “**Blueshift**”, “**we**” or “**us**”) are committed to respecting your privacy.

### **About this Privacy Notice**

Maintaining your privacy is important to us and we hold ourselves to high standards in the safekeeping and use of your personal data. This privacy notice applies if you are a client or vendor of Blueshift, an investor<sup>1</sup> in any fund or account managed or advised by Blueshift (a “**Blueshift Fund**”), or a member, partner, shareholder, beneficial owner, officer, director, employee, prospective employee, or other representative of any client, vendor or investor, or any prospective client, vendor or investor (“**you**” or “**your**”) whose personal data Blueshift collects and controls in the conduct of its business. For information about other aspects of Blueshift’s approach to personal data, please contact us by using the details set out in the “Contacting Us” section below.

The privacy notice sets out the basis on which any personal data that you provide to us, that we create, or that we obtain about you from other sources will be:

- processed by us;
- the purposes for which we will process such data;
- your privacy rights under applicable privacy laws including, where applicable, under General Data Protection Regulation (“**GDPR**”) and other data privacy laws in the US, United Kingdom or European Union (together, the “**Privacy Laws**”); and
- how we protect your personal data.

We have developed policies designed to protect the confidentiality and privacy of data relating to you, while allowing the needs of investors and clients to be served. Please take the time to read and understand this privacy notice.

### **Personal Data that We Collect About You**

Blueshift may collect and process your personal data in connection with any person’s existing or proposed engagement with Blueshift including without limitation your name, social security number, residential address, email address, contact details, corporate contact information, signature, nationality, place of birth, date of birth, tax identification, correspondence records, passport number, bank account details, and source of funds details and details relating to your investment activity. This information may come from sources such as a resumé mailed or emailed to Blueshift, an employment background check conducted or outsourced by Blueshift, application or subscription documents and financial information or other forms or materials completed or supplied by actual or prospective Blueshift investors, other written, electronic or verbal correspondence, capital account balance, contributions, income allocations and distributions. We may also collect personal information provided by you in calls, which may be recorded by us, as required by applicable laws. We may also collect special categories of personal data (as defined in the Privacy Laws) where provided by you, with your consent, such as disability information or religious data for purposes required by you for purposes such as scheduling of meetings or access to Blueshift or Blueshift premises.

### **Uses of Your Personal Data**

We collect your personal information to fulfill our contractual obligations, our statutory and regulatory obligations and/or the legitimate interests of Blueshift and for other purposes for which Blueshift has a lawful basis under the Privacy Laws, including:

- to conduct our anti-money laundering obligations, to verify the identity of our customers (and, if applicable, their beneficial owners), for the prevention of fraud, for regulatory or tax reporting purposes or in response to legal requests or requests from regulatory authorities (*e.g.*, where this is necessary for compliance with a legal obligation to which we are subject);
- for purposes of reporting to, or communicating with Blueshift investors concerning their investment in Blueshift;
- in connection with our investment activities, including investment due diligence or investment monitoring activities or in response to “Know Your Customer” and “Customer Identification Program” requirements of brokers, counterparties, exchanges or regulatory bodies;
- in connection with litigation, investigations, regulatory or governmental inquiries or for other legal or regulatory purposes involving Blueshift, and/or
- for other legitimate business interests including but not limited to, recruiting purposes, hiring purposes, marketing purposes, quality control, business and statistical analysis or tracking fees and costs, customer service, training and related purposes (*i.e.*, where this is for the purposes of the legitimate interests of us or a third party and such legitimate interests are not overridden by your interests, fundamental rights or freedoms and provided that we are acting in a fair, transparent and accountable manner and have taken appropriate steps to prevent such activity having any unwarranted impact on you and also noting your right to object to such uses). If you have provided special categories of personal data to us to enable us to respond to certain requests by you such as access requests or scheduling of meetings or similar

<sup>1</sup> The terms “Investors” and “you” include existing, prospective and former investors in a Blueshift managed investment vehicle, including natural persons or entity clients. In addition to Investors, this privacy notice is being distributed to shareholders, unitholders and limited partners invested in any investment vehicle for which a member of Blueshift acts as an investment adviser, trading manager, trading advisor, trustee, investment manager, general partner or in a similar capacity.



requirements, we do so with your consent. Should we wish to use your personal data for any purpose that requires your consent, we will contact you.

### **Disclosure of Your Information to Third Parties**

We may share your personal information with Blueshift affiliated companies, including with Blueshift Funds, for any of the purposes set forth above. If you are in the European Economic Area (“**EEA**”), our Blueshift entities are not permitted to share your information with other non-affiliated entities, except as described in the “International Transfers of Personal Data” section below or as otherwise permitted by the Privacy Laws or other applicable laws. We will take steps to ensure that your personal data is accessed only by employees of such affiliates that have a need to do so for the purposes described in this notice.

We may also share your personal data outside of Blueshift:

- to service providers (e.g., professional employer organizations, payroll providers, benefit providers, outsourced human resource providers, investment advisors, attorneys, auditors, accountants, tax advisers, insurers, fund administrators, custodians, depositories, distribution managers, brokerage firms, event organizers or other agents, advisers or service providers of Blueshift or any Blueshift Fund. As is common in the industry, non-affiliated third-party companies may from time to time be used to provide certain services, such as administration services, tax compliance services, reporting, account services, organizing events, and conducting research. These companies may have access to your personal information but are permitted to use the information solely to provide the specific service or as otherwise permitted by law;
- other counterparties, including any vendor, any lender or any of their respective managers, general partners or investment advisers or administrators, or any of their respective agents or representatives or any affiliate of any of the foregoing. For example, we may share personal information with a prospective portfolio fund of any Blueshift Fund or Blueshift Investor in order to respond to the anti-money laundering inquiries of such portfolio fund;
- to third party agents or contractors (for example, the providers of our electronic data storage services) for the purposes of providing services to us. These third parties will be subject to confidentiality requirements and they must agree to only use your personal data as described in this privacy notice; and
- to the extent required by law (for example, if we are under a duty to disclose your personal data in order to comply with any legal obligation, establish, exercise or defend our legal rights).

### **International Transfers of Personal Data**

The personal data that we collect from you may be transferred to, and stored at, a destination outside your home country and may also be processed by staff operating outside of your home country who work for Blueshift affiliates or for one of our service providers. If you are in the EEA and we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA. This can be done in a number of ways, for instance:

- the country that we send the data to might be assessed by the European Commission as having an adequate level of protection for personal data;
- the recipient might have agreed to the “model contractual clauses” approved by the European Commission, obliging them to protect your personal data; or
- where the recipient is located in the US, it might participate in the EU-US Privacy Shield scheme. The transfer of personal data from the UK and EEA to the Blueshift entities outside the UK and EEA is governed by data transfer agreements which are in the form of the standard contractual clauses approved by the European Commission.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will use commercially reasonable efforts to ensure that any transfer of your personal data is consistent with Privacy Laws.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA by contacting us in accordance with the “Contacting Us” section below.

### **Confidentiality and Security**

Blueshift does not sell personal information. We do not share your non-public personal information with other financial firms or non-affiliates other than as specifically set forth herein. Internally, Blueshift restricts access to non-public personal information about employees, prospective employees, and Blueshift Investors to those personnel who need to know that information in order to offer and provide products or services to you or to otherwise manage your relationship and/or account(s) with Blueshift. In addition, Blueshift uses physical, electronic and procedural safeguards to protect your non-public personal information.

### **Privacy and the Internet**

Blueshift maintains a public website, [www.blueshift.am](http://www.blueshift.am). Among other things, Blueshift uses firewall barriers and authentication techniques in order to protect your privacy online. When you visit a Blueshift website, we may collect technical and navigational information, such as computer browser type, internet protocol address, pages visited and the time, date and duration of a visit. Additionally, [www.blueshift.am](http://www.blueshift.am) uses cookies. Please refer to our Cookie Notice below for more information.



### **Retention of Personal Data**

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- the purpose for which we are using it – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

### **Recording and Monitoring of Telephone Calls and Other Communications**

Blueshift may record telephone lines and monitor voice and electronic communications for regulatory purposes. Emails and other electronic communications may be stored and retained in secure email vaults for legal or regulatory purposes.

### **EEA Data Subjects: Your Rights**

If you are in the EEA, you have a number of legal rights in relation to the personal data that we hold about you. These rights include:

- the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- the right to withdraw any consent given to our processing of your personal data at any time (where applicable). Please note, however, that we may still be entitled to process your personal data if we have a legitimate reason (other than consent) for doing so;
- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;
- the right to request that we rectify your personal data if it is inaccurate or incomplete;
- the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- the right to object to, and the right to request that we restrict, our processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request; and
- the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

You can exercise your rights by contacting us using the details set out in the “Contacting Us” section below. You can find out more information about your rights by contacting the Information Commissioner’s Office, or by searching their website at <https://ico.org.uk/>.

### **Contacting Us**

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed above, please address questions, comments and requests to the

Blueshift Data Security:  
151 Bodman Place, Suite 301  
Red Bank, NJ 07701  
Telephone: 1-732-450-8401  
Email: [ir@blueshift.am](mailto:ir@blueshift.am)

### **Changes to this Privacy Notice**

Blueshift may change this privacy notice from time to time by posting an updated version on [www.blueshift.am](http://www.blueshift.am). This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection.



## **THIS COOKIE NOTICE APPLIES TO OUR WEBSITES AND PLATFORMS**

### **Cookies**

To make the Blueshift website work properly, we sometimes place small data files on your device, called “cookies.”

### **What are cookies?**

A cookie is a small text file that a website saves on your computer or mobile device when you visit a website. To learn more about cookies, please visit [aboutcookies.org](http://aboutcookies.org).

### **What types of cookies do we use?**

- **Necessary cookies** - Necessary cookies are used for the purpose of authentication and providing data security. These cookies are necessary for our website to work and enable us to distinguish users and enable you to use its services and features. These cookies may include the following:

<b>Cookie Name</b>	<b>Purpose</b>	<b>Duration Period</b>
ASP.NET_SessionID	Used to distinguish users	Session
.ASPXFORMSAUTH	To remember your username/password	Session

- Blueshift does not use **Functional** of **Analytical Cookies**.

### **How to control cookies?**

You can control and/or delete cookies as you wish, for details see [analytics.google.com](http://analytics.google.com). You may restrict or disable to use of cookies through your web browser. However, by doing this you may not be able to take full advantage of how our website uses and obtains cookies.

### **Changes to this Cookie Notice**

We may alter this Cookie Notice at any time so please check this page occasionally.