

**LIBERTAD POOL OPERATOR LLC  
PRIVACY POLICY**

*May 30, 2025*

*This document outlines the privacy policy for Libertad Pool Operator LLC (“Libertad”), a commodity pool operator registered with the Commodity Futures Trading Commission (CFTC) and the National Futures Association (NFA), and each of the pools for which Libertad serves as a general partner. This policy applies to Libertad Fractal Pool LP which will adhere to the policies and practices described in this document.*

**Regarding the Collection of Investor Information**

Libertad Pool Operator LLC (“Libertad”) may collect or have access to certain non-public personal information about current and former participants in the Pool. Nonpublic personal information may include, but is not limited to, information received from investors during the subscription process, such as social security number or applicable government identification number, name, legal age, nationality, address and country of residence, phone number, and email address. It may also include financial information such as net worth, annual income, tax identification number, occupation, employer’s name, and years of experience in commodity trading.

Additionally, Libertad’s website employs “cookies” and similar technologies to monitor and analyze visitors’ activity. This includes gathering technical and navigational data such as browser type, IP address, pages visited, and time spent on the site. This information may be used to improve website design, user experience, and functionality.

**Regarding the Disclosure of Investor’s Nonpublic Personal Information:**

Libertad does not disclose information to nonaffiliated third parties unless required by law or permitted by investors by writing. Access to the nonpublic personal information they collect about pool participants is restricted only to employees and service providers and their affiliates’ employees who need access to such information to provide products and services to investors.

Pool participants have no right to opt out of such disclosures under the conditions outlined in this policy, consistent with Section 502(e) of the Gramm-Leach-Bliley Act (GLBA), which permits information sharing for legal, regulatory, compliance, and servicing purposes without providing an opt-out mechanism

**Regarding the Protection of Investor Information:**

Libertad has adopted physical, electronic, and procedural safeguards designed to ensure the confidentiality, integrity, and availability of investors’ personal data. Access to personal information is limited to employees who require it for legitimate business purposes. All information must be used only as needed and maintained in strict confidence in accordance with Libertad’s internal privacy and information security policies.



**Regarding the Privacy Policy Communication Channels:**

Libertad retains personal and financial information from investors, including those who have redeemed or withdrawn from a Pool managed by Libertad, for a minimum of five (5) years or as otherwise required by applicable laws and regulatory guidance, including CFTC and IRS retention rules. After the applicable retention period, information of investors who have redeemed their interests in the Pools managed by Libertad will be securely destroyed or archived using appropriate methods (e.g., secure digital deletion, document shredding, or long-term encryption) to prevent unauthorized access or use.

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A copy of the Privacy Policy is available on Libertad Pool Operator LLC website at [www.libertadpooloperator.com](http://www.libertadpooloperator.com).