



BRAINPOWER
TRADING

PRIVACY POLICY

OUR COMMITMENT TO YOU

PRIVACY POLICY

The Partnership is committed to safeguarding Partners' non-public personal information and in general, will not disclose such information, except where disclosure of the same is required for purposes of the Partnership's ordinary business operations (i.e., to third party service providers, including, without limitation, attorneys, accountants, administrators, broker-dealers, trading advisors, and account custodians, engaged by the Partnership), to comply with judicial process, or where the Partner has previously authorized the Partnership to make such disclosures. Non-public personal information shall include, without limitation, information and records pertaining to a Partner's personal background, investment objectives, financial situation, investment holdings, account numbers, account balances, and the like (collectively, "Personal Information").

This Privacy Policy describes how the Partnership and its affiliates handle and protect Personal Information collected by the Partnership as part of the investment process. The provisions of this policy apply to prospective, current, and former Partners of the Partnership.

Privacy of Your Personal Information, Generally

The Partnership takes reasonably prudent steps to keep confidential all Personal Information pertaining to each Partner unless (a) the General Partner is previously authorized to disclose such information to individuals and/or entities not affiliated with the Partnership, including, but not limited to, the Partner's other professional advisors and/or service providers (i.e., attorneys, accountants, administrators, broker-dealers, trading advisors, account custodians, and others independently engaged by the Partner); (b) required to do so by judicial or regulatory process; or, (c) otherwise permitted to do so in accordance with the parameters of Regulation S-P.

The disclosure by the Partnership and/or its affiliates of any Personal Information provided by a Partner in any document completed by such Partner for processing and/or transmittal by the Trading Advisor, General Partner, or their affiliates in order to facilitate the commencement, continuation, or termination of an investment in the Partnership (or other business relationship between the aforesaid parties) shall be deemed as having been automatically authorized for dissemination by the Partner with respect to disclosure to corresponding non-affiliated third party service providers of the Partnership (i.e., attorneys, accountants, administrators, broker-dealers, trading advisors, account custodians, and the like). Each third party service provider engaged by the Partnership is aware of the aforesaid privacy policy and has acknowledged his or her or its independent requirement to comply with the same. In accordance with this privacy policy, each such third party service provider shall have access to Personal Information to the extent reasonably necessary for the performance of its service for the Partner/investor and the Partnership generally and to comply with regulatory procedures and requirements.

Why and How the Partnership Collects Personal Information

When Partners apply for or maintain an account with the Partnership, the General Partner collects Personal Information about the Partners for business purposes, such as evaluating Partners needs, processing Partners requests and transactions, informing Partners about products and services that may be of interest to a Partner, and providing customer service.

Types of Personal Information Collected by the Partnership

The Personal Information we collect about Partners may include:

- information provided to the General Partner on agreements, applications, and other forms, such as the investor's name, address, date of birth, social security number, occupation, assets, investment experience, and income;
- information about Partner transactions with the Partnership and with the Partnership's affiliates;
- information the General Partner receives from consumer reporting agencies and/or other entities not affiliated with the Partnership; and
- information Partners provide to the General Partner to verify identity, such as a passport or driver's license, or received from other entities not affiliated with the Partnership.

How the General Partner Protects Personal Information

The General Partner limits access to Personal Information it has received from Partners to those employees who need to know in order to conduct Partnership business and/or to service the Partner's account. Employees of the General Partner are required to maintain and protect the confidentiality of Partners' Personal Information and are instructed to follow established procedures to do so. The Partnership maintains physical, electronic, and procedural safeguards to protect Partners' Personal Information. The General Partner does not rent or sell Partners' names or Personal Information to anyone.

Sharing Information With Partnership's Affiliates

The General Partner may share Personal Information described above with its affiliates for business purposes, such as servicing Partner accounts and/or informing Partners about new products and services, and as permitted by applicable law.

The information the General Partner shares with its affiliates for marketing purposes may include the Personal Information described above, such as name, address and account information.

Disclosure to Non-Affiliated Third Parties

Except as required to conduct the Partnership's ordinary business operations (by sharing Personal Information with non-affiliated third party service providers engaged by the Partnership), Personal Information shall not be shared with any non-affiliated third parties without first obtaining the authorization of the underlying Partner.

Notwithstanding the foregoing, the General Partner may disclose Personal Information to non-affiliated companies and regulatory authorities as permitted or required by applicable law. For example, the General Partner may disclose Personal Information to cooperate with regulatory authorities and law enforcement agencies to comply with subpoenas or other official requests, and as necessary to protect the General Partner's rights or property. Except as described in this Privacy Policy, the General Partner will not use Partners' Personal Information for any other purpose unless the General Partner describes how such information will be used at the time the Partner discloses it to the General Partner or the General Partner obtains the Partner's permission to do so.

Accessing and Revisiting Partner Personal Information

The General Partner endeavors to keep Partner files complete and accurate. The General Partner will give Partners reasonable access to the information the Partnership has about the Partner requesting the same.

Most of this information is contained in account statements that Partners' receive from the Partnership and applications that Partners submit to obtain Partnership products and services. The General Partner encourages Partners to review this information and notify the Partnership if any Partner believes any information should be corrected or updated. If Partners have a question or concern about their personal information or this privacy notice, please contact the General Partner.

Right to Opt Out

Partners have the right to opt out of with respect to General Partner's ability to share Partners' personal information with the Partnership's affiliates. If you desire that the General Partner not share Partners' Personal Information in this manner, please send an e-mail to the manager of the General Partner, Anthony Denaro (denarocapital@gmail.com), with "Privacy Policy Opt Out" in the subject line. Within 48 hours of receipt of such opt-out e-mail, the Partnership will cease sharing any of your Personal Information with its affiliates.