



## Traxis Partners Privacy Policy

**Our Commitment to Your Privacy:** Traxis Partners LP ("Traxis") has a policy of protecting the confidentiality and security of information we collect about our advisory clients ("you"). We will not share nonpublic personal information about you ("Information") with third parties without your consent, except for the specific purposes described below. This notice describes the Information we may gather and the circumstances under which we may share it.

**Delivery of this Privacy Statement:** Traxis will deliver to its advisory clients a copy of this Privacy Policy on an annual basis in compliance with federal laws regarding the privacy of the Information. Federal privacy laws apply to U.S. individuals. The Traxis Privacy Policy covers individuals but may also be extended to corporations, partnerships, trusts or other non-individual advisory clients where Traxis may come into possession of information pertaining to individuals who are, in turn, employees or sole clients of our advisory clients. For purposes of this policy, a sole client of an advisory client is an individual that maintains a private banking relationship exclusively with your sole organization.

**Why We Collect and How We Use Information:** We collect and use Information in a manner that we believe is necessary and appropriate in order to provide you with the highest quality services possible. We may collect and maintain current information about you in order to open and service your advisory account, make appropriate recommendations for investments, process transactions in your account and track its performance, comply with federal, state and regulatory body requirements, and properly administer our business. If you or one of your clients is an investor in a fund that we advise, we may also collect information to ensure that the fund's eligibility requirements are met and to monitor all fund-related contributions, withdrawals and allocations and to provide investor relations.

**How We Gather Information:** We get most Information directly from you when we enter into and sign an investment advisory agreement with you. In addition, when you or your clients invest in a fund advised by Traxis, we may collect certain relevant Information in the fund's subscription documents, to assess an investor's eligibility to invest in the fund. We may verify this Information or get additional Information from consumer reporting agencies or other sources. This Information may include, but not be limited to, financial circumstances, investment experience, credit information, investment objectives/guidelines, employment history, contact and interested party information, including first and last name, address, phone/fax numbers, social security number/tax-id and email address. For corporate, trust and partnership entities, we may collect copies of charter documents; copies of trust, partnership, voting and similar agreements; information regarding authorized signatories, affiliated entities, and foreign operations, among other things. We may collect information by requesting an entity/individual to complete written forms, in personal meetings, and in telephone conversations and other correspondence. Further, we may collect and maintain information pertaining to account activity, including transactions, balances, and history. We may also collect information that is entered on our website or that we derive from what an individual/entity requests, views or downloads from our website.

**How We Protect Information:** Our employees are required to protect the confidentiality of Information and to comply with our established policies. They may access Information only when there is an appropriate reason to do so, such as to administer our investment advisory products or services. Employees who violate our Privacy Policy are subject to disciplinary action. Employees are prohibited, either during or after termination of employment, from disclosing non-public personal information to any person or entity outside of Traxis, including family members, except under the circumstances described in this Privacy Policy. We also maintain physical, electronic and procedural safeguards to protect



Information, which comply with all applicable laws. Our hired agents and service providers, which include but are not limited to, fund administrators, prime brokers, printers, and mailing agents are required to enter into a confidentiality agreement with Traxis to protect the confidentiality of your Information. Any unaffiliated tenants at a Traxis location are also required to enter into a confidentiality agreement with Traxis to protect the confidentiality of your Information.

**Safeguarding your Information:** Our employees take precautions to ensure the information we collect about you is protected and accessed only by authorized individuals or organizations. Our service providers are not allowed to use information about you for their own purposes and are contractually obligated to maintain confidentiality. Our employees are advised on the Traxis Privacy policy. We maintain physical, electronic and procedural safeguards. In addition, we have procedures in place to properly dispose of confidential information, e.g. shred documents that contain personal information.

**Disclosure of Information:** We may disclose any kind of Information when we believe it necessary for the conduct of our business, or where disclosure is required by law. For example, Information may be disclosed for the purposes of processing transactions, audit or research purposes, to attorneys or other professionals, or to law enforcement and regulatory agencies to help, among other things, prevent fraud or money laundering. In addition, we may disclose any kind of Information to third party service providers (i) to enable them to provide administration and accounting services; perform computer related or data maintenance, distribute reports or process services for us, (ii) to facilitate the processing of transactions requested by you, (iii) to assist us in offering products and services available to you, or (iv) for credit review and reporting purposes. Except in those specific, limited situations, without your consent, we will not make any disclosures of Information about you to other companies who may want to sell their products or services to you. For example, we do not sell customer lists and we will not sell your name to a catalog company or telemarketer. It is Traxis' policy to request that all third parties that are to receive any Information enter into confidentiality agreements with Traxis.

**Former Advisory Clients:** Even if you are no longer an advisory client of Traxis, our Privacy Policy continues to apply to you firm and its employees.

**Access to and Correction of Information:** If you desire to review any file we may maintain for your Information, please contact us. However, Information collected in connection with, or in anticipation of, any claim or legal proceeding may be made available at the discretion of Traxis. If you notify us that any Information is incorrect, we will review it. If we agree, we will correct our records. If we do not agree, you may submit a short statement of dispute, which we will include in future disclosures of the disputed Information.

**Further Information:** We reserve the right to change this Privacy Policy. The examples contained within this Privacy Policy are illustrations and they are not intended to be exclusive. This notice complies with Federal law, State law and SEC regulations regarding privacy. You may have additional rights under other foreign or domestic laws that may apply to you.

**Contact Us:** You may contact us concerning the Traxis Privacy Policy by sending written correspondence to:

Traxis Partners  
Attn: Chief Compliance Officer  
600 Fifth Avenue 26<sup>th</sup> Floor  
New York, NY 10020  
(212) 332-5178 – fax