



PRIVACY NOTICE

Your privacy is very important to Rock Creek Group LLC (“RockCreek”). This Privacy Notice sets forth RockCreek’s policies with respect to nonpublic personal information about Investors, prospective Investors and former Investors. These policies apply to individuals and Individual Retirement Accounts only.

Personal Information We Collect and How We Collect this Information. You provide RockCreek with personal information, such as your address, social security number, assets and/or income information, (i) in the Subscription Agreement and related documents, (ii) in correspondence and conversations with an applicable Fund’s representatives or RockCreek’s representatives and (iii) through transactions involving any Fund or account managed by RockCreek.

Disclosure to Others. RockCreek may disclose nonpublic personal information about Investors, prospective Investors or former Investors to non-affiliated third parties providing services on RockCreek’s behalf, such as its vendors and agents as necessary to operate RockCreek’s business and to be in compliance with applicable laws and requirements. RockCreek obligates third parties performing services on its behalf to safeguard the confidentiality of your information. RockCreek may also disclose nonpublic personal information about you to third parties to provide the services you request and to facilitate the acceptance and management of your investment. Finally, RockCreek may also disclose this information at your direction or as otherwise permitted or required by law, for example to comply with legal process, to fulfill RockCreek’s regulatory obligations under anti-money laundering and similar laws, or in connection with any government or self-regulatory organization request or investigation.

How We Use this Information; How We Protect Your Information. Only those employees and other persons who need to know the information to enable RockCreek or an applicable Fund to provide services to you are authorized to access nonpublic personal information about Investors. RockCreek has also implemented physical, electronic and procedural safeguards designed to protect this information from unauthorized access, alteration, use, or destruction.

RockCreek reserves the right to change the policies described in this Privacy Notice from time to time, but will provide appropriate notice of any material changes.

Additional Information under the Cayman Islands Data Protection Law 2017 (“Cayman DPL”)

The applicable Fund may share your personal information with its service providers, including the Administrator and its affiliates. It may also be necessary to share your information with the Cayman Islands Monetary Authority or Tax Information Authority, which may, in turn, exchange this information with foreign tax authorities, regulatory or law enforcement agencies. Service providers or their delegates may collect, receive and process personal data as a data processor and shall do so in accordance with the Cayman DPL, including (a) processing personal data in accordance with the Fund’s agreement with the Administrator, which for purposes of the Cayman DPL will constitute written instructions of the Fund and (b) implementing and maintaining appropriate technical and organizational measures in relation to the processing of personal data, including security measures to prevent the unauthorized access, disclosure, damage or destruction of personal data.

FOR CALIFORNIA RESIDENTS ONLY

This PRIVACY NOTICE FOR CALIFORNIA RESIDENTS supplements the information contained in the Privacy Notice and applies solely to users who reside in the State of California (“you”). We adopt this notice to comply with the amended California Consumer Privacy Act of 2018 (“CCPA”), The California Privacy Rights Act (the “CPRA”) and other California privacy laws. Any terms defined in the CCPA and/or the CPRA have the same meaning when used in this notice.

Categories of personal information that we collect –

During our communication with you via texts, calls, emails we might collect the below mentioned categories of personal information. This information might also be collected if you visit our website. *Note that the categories listed below are defined by California state law. Inclusion of a category in the list below indicates only that, depending on the services we provide you, we may collect some information within that category. It does not necessarily mean that we collect all information listed in a particular category.*

Category	Description	Examples
A.)	Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.
B.)	Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information. Some personal information included in this category may overlap with other categories.
C.)	Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).
D.)	Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.
E.)	Internet or other similar network activity.	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.
F.)	Geolocation data.	Physical location or movements.
G.)	Professional or employment-related information.	Current or past job history or performance evaluations.

Category	Description	Examples
H.)	Inferences drawn from other personal information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

Note: This is not an exhaustive list. Please see more details here - <https://oag.ca.gov/privacy/ccpa#:~:text=The%20California%20Consumer%20Privacy%20Act,how%20to%20implement%20the%20law>

How We Use the Information We Collect

We may use the information we collect from you to:

- provide services to you;
- bill/invoice you;
- process and complete corporate transactions (e.g., subscriptions, wires);
- manage any accounts that you may have with us;
- validate your identity;
- send personalized marketing messages via email, post and telephone to you. Where required by applicable law, we will send these messages with your consent, and you have the right to opt out of receiving marketing by contacting us;
- provide you with notice of special events, trainings, promotions or other matters relevant to you;
- respond to your inquiries;
- improve the services you receive from us;
- solicit your feedback;
- prevent you from having to re-enter personal information about you on future visits to our websites or subsequent use of our applications;
- operate, evaluate and improve our business (including enhancing and improving our services; managing our communications; performing data analytics; and performing accounting, auditing and other internal functions);
- answer your questions via Zoom calls;
- detect and prevent fraud and other unauthorized activity and enforce our terms of use; and
- comply with applicable legal requirements, relevant industry standards and our policies.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

How Long We Keep Personal Information

At a minimum, we will keep personal information about you for as long as we have a relationship with you, for example as long as you are a customer (and for a reasonable period thereafter). When determining how long to retain personal information after we no longer have a relationship with you, we take into account how long our customers usually want to continue hearing from us, our legal and regulatory obligations the expectations of regulators, as well as the length of time information is needed for internal audit purposes and to exercise or defend our legal rights.

- **Retention in case of queries** - We may retain your personal information for a reasonable period in case of follow up queries from you.

- **Retention in case of claims** - We may retain your personal information for the period in which you might legally bring claims against us (this means we will retain it in line with relevant limitation periods, which are applicable to your jurisdiction)
- **Retention in accordance with legal and regulatory requirements** - We will consider whether we need to retain your personal information after the period of retention in the case of queries or claims because of a legal or regulatory requirement.
- **Retention permitted under applicable law** - We will continue to retain personal information where necessary to provide our services to you and the retention of such personal information is necessary for the purposes of pursuing our legitimate interests or where it is necessary for public interest purposes.

We review our retention periods for Personal Information on a regular basis, and all data is retained in compliance with applicable data protection law. We will only permanently retain certain basic Personal Information, for limited purposes. This is in relation to retaining basic contact details, to keep a record that you were a customer, in case you return in future, or where you have asked us not to contact you again.

Your Rights

Subject to our regulatory and legal obligations, you may be entitled to certain rights, which can include:

- Where our use of your personal information requires consent, you may withdraw this consent at any time;
- You may request access to your personal information we hold about you and obtain information about how we process it. Depending on the applicable privacy laws, you may be entitled to request the categories and specific pieces of personal information that we have collected about you, the categories of sources from which the personal information was collected, the purposes of collecting the personal information, the categories of third parties we have shared the personal information with, and the categories of personal information that have been shared with third parties for a business purpose;
- You may update, correct or amend the personal information we hold about you if it is wrong;
- You may ask us to change, restrict or stop the way in which we communicate with you or process personal information about you;
- You may ask us to delete your personal information;
- You have rights in relation to automated decision making, including profiling which has a legal effect, or which causes a significant effect;
- You may ask us to move, copy or transfer your personal information;
- You may object to our processing of your personal information; and
- You may opt out of the sale of personal information—however, for purposes of California law, we do not sell your personal information to third parties, nor do we intend to, as those terms are defined by California privacy law. In addition, we have contracts with our service providers to prohibit any sale of the personal information we provide them; but if you have any concerns that our third parties might be selling your information, please contact us.