

MILLENNIUM – SUPPLEMENTAL PRIVACY NOTICE FOR EEA INVESTORS AND INVESTORS IN CAYMAN ISLANDS FEEDER FUNDS

This notice sets forth the personal data privacy practices of Millennium Management LLC (“**MM LLC**”; together with various affiliates,¹ “**Millennium**”) with respect to the personal data of investors in any fund for which MM LLC or WMA Global Management LLC (“**WMA**”) is the investment manager (each such entity, a “**Fund**”). This notice only applies to the following persons: (a) individuals (i) located in the European Economic Area (“**EEA**”) who have invested in a Fund, or (ii) who have invested in a Cayman Feeder Fund (“**Individual Investors**”); and (b) Authorized Persons (as defined below) of legal persons invested in (i) a Fund (where the Authorized Person is based in the EEA) or (ii) a Cayman Feeder Fund (such legal persons, “**Institutional Investors**”).

Individual Investors and Authorized Persons are collectively referred to as “**Investor Parties**”.

Data We Collect. Millennium collects personal data of Individual Investors, including: last name, first name, date and place of birth, contact information, bank information, tax identification number(s), country of tax residence(s), residence address (including proof thereof), source of funds, official government-issued identification (such as a passport or national ID), net worth standard qualification, as well as financial information, such as assets held in the account or payments made with respect to the account, account balances, proceeds from the sale or redemption of property paid or credited to the account together with any other information which may be necessary to satisfy our know-your-customer obligations or which is required by applicable laws.

Millennium also collects names and identity verification documents of partners, directors, significant shareholders, founders, trustees, beneficiaries and authorized signatories of Institutional Investors (collectively, “**Authorized Persons**”), as applicable.

Use of Investor Parties’ Personal Data and Legal Basis for Processing. Millennium will use Individual Investors’ or Authorized Persons’ personal data in the course of business for the purposes of conclusion and performance of contracts with Individual Investors or Institutional Investors, including, specifically: (a) entering into the Subscription Agreement, (b) processing subscriptions, redemptions/withdrawals, transfers and other changes in an investor’s status, (c) maintaining the registers of investors, (d) providing financial and other information to Investor Parties, (e) maintaining global client records and providing centralized administrative and investor relations and related services and (f) complying with applicable anti-money laundering rules, tax reporting requirements and other legal obligations.

In the case of Individual Investors, Millennium processes personal data because it is necessary for the performance of a contract or to satisfy an applicable regulatory or legal obligation, which may arise under applicable laws. In the case of Authorized Persons, Millennium processes personal data on the basis of a legitimate business interest, as a necessary element of entering into and performing

¹ The affiliates, for the purposes of this notice, include: Millennium International Management LP (“**MIM**”), Millennium Capital Partners LLP (“**MCP**”), WorldQuant LLC (“**WQ LLC**”), WMA, Millennium International, Ltd. (“**MIL**”), WMQS Global Equity Active Extension Offshore Fund, Ltd. (“**GEAEO**”), WMA International Equity 130/30 Offshore Fund, Ltd. (“**IEO**”), and WMA US Equity 130/30 Offshore Fund, Ltd. (“**USEO**”). For the purposes of Regulation (EU) 2016/679 (“**GDPR**”) and The Data Protection Law, 2017 (Cayman Islands), (“**DPL**”), MM LLC, MIM and MCP are “Data Controllers” with regards to MIL, while MM LLC, MIM, MCP, WQ LLC, and WMA are “Data Controllers” with regard to GEAEO, IEO and USEO. In addition, MIL, GEAEO, IEO and USEO are “Data Controllers” on their own behalf and are collectively referred to as “**Cayman Feeder Funds**”.

contracts with Institutional Investors, or to satisfy an applicable regulatory or legal obligation, which may arise under applicable laws.

Disclosure to Certain Third Parties. Millennium may disclose certain personal data: (a) to its affiliates and service providers, such as fund administrators, auditors, legal and tax advisors or broker-dealers; (b) to fraud prevention agencies and law enforcement agencies; (c) to courts, governmental and non-governmental regulators, tax authorities and ombudsmen; (d) to any third party that acquires, or is interested in acquiring, all or part of Millennium's assets or shares, or that succeeds Millennium in carrying on all or a part of its business, whether by merger, acquisition, reorganization or otherwise; (e) as required or permitted by law, including to comply with a subpoena or similar legal process or government request, or when Millennium believes in good faith that disclosure is legally required or Millennium has a legitimate interest in making a disclosure, such as where necessary to protect Millennium's rights and property; or (f) as directed or authorized by the subject of the personal data.

Transfer of Personal Data Outside the EEA or Cayman Islands. Investor Party personal data may be transferred to other recipients located in countries outside of the EEA or Cayman Islands, which may not have equivalent data privacy laws. We transfer Investor Parties' data because it is necessary for the provision of the services listed in the "Use of Investor Personal Data" section above. To the extent that Investor Parties initially provide personal data to Millennium within the EEA or Cayman Islands, we may transfer such data outside such jurisdiction. If we do so, we will ensure that personal data is protected and transferred in accordance with applicable legal requirements, which can be done as follows:

- the country to which we send personal data may be approved by the European Commission;
- the recipient may have signed a contract based on standard contractual clauses approved by the European Commission ("**model clauses**"), obliging them to protect your personal information; or
- if the recipient is located in the US, it may be a certified member of the EU-US Privacy Shield scheme.

Investor Parties may request access to model clauses by contacting Millennium at the email below.

Rights of Investor Parties. Under applicable data privacy laws, Investor Parties may have a right to: (a) request access to and rectification or erasure of their personal data; (b) obtain restriction on processing or to object to processing of their personal data; and (c) the right to data portability. If you wish to exercise any of these rights you should contact Info_MLP@mlp.com. Investor Parties also have the right to lodge a complaint about the processing of their personal data with their local data protection authority in the EEA, or with the Office of the Ombudsman in the Cayman Islands, as applicable.

Security and Retention. Millennium will take reasonable steps to protect Investor Parties' personal data against loss or theft, as well as from unauthorized access, disclosure, copying, use or modification, regardless of the format in which it is held. The length of time for which Millennium will maintain Investor Parties' personal data will principally depend on (a) how long we need to keep the information for the relevant purpose, and (b) the period of time for which we have to keep your personal information in accordance with any applicable legal or regulatory requirement.

Obligations of Institutional Investors. Each Institutional Investor must ensure that it has complied, and shall continue to comply, with its obligations relating to personal data that apply to it under the applicable data privacy laws in the EEA, Cayman Islands, and any other jurisdiction in which that Institutional Investor has any operations.

Institutional Investors are reminded that it is their responsibility to: (a) provide adequate notice, and obtain valid consents from, Authorized Persons, in each case, to the extent necessary for Millennium to process personal data in connection with any Subscription Agreement that the Institutional Investor and Millennium are parties to (including cases in which the Institutional Investor may transfer personal data to Millennium in Cayman Islands, and/or countries both within and outside of the EEA); (b) ensure that they shall not, by act or omission, cause Millennium to violate any data privacy law notices provided to, or consents obtained from, individuals as a result of processing personal data for any purpose relating to any Subscription Agreement, a shareholder's ownership of shares in a Fund or an Institutional Investor's ownership of interests in a Fund (as applicable); and (c) ensure that Millennium is informed when an Authorized Person is no longer associated with the Institutional Investor.

For any questions regarding this notice, please contact Info_MLP@mlp.com.