



CLIENT PRIVACY NOTICE

This Privacy Notice is provided by Stark & Roth LLC and its affiliated investment managers (collectively, “our,” “we,” or “us”) on behalf of its private investment funds and any separately managed account for which we serve, or may serve in the future, as investment manager (each, a “Fund” and collectively, the “Funds”) and sets forth the policies of the Funds with respect to non-public, personal information of the Funds’ investors, prospective investors and former investors. These policies may be changed at any time, provided a notice of such change is given to you.

We do not disclose nonpublic, personal information about former, prospective, or current Fund investors to third parties other than as described below.

You provide us with personal information, such as your address, social security number or other identification number, assets and/or income information in (i) the Subscription Agreement and related documents, (ii) correspondence and conversations with us and our representatives, and (iii) your investment transactions with us. In addition, we may obtain information about you from consumer reporting agencies or other firms that provide services to us.

We may use this information to provide services to you, to initiate your investment in a private investment fund or separate account, to process a transaction for you, or otherwise in furtherance of our business. In order to service your private investment fund interest or separate account and to effect transactions, we may provide your personal information to our affiliates and to the extent allowed by law, firms that assist us in providing services to you and have a need for such information such as attorneys, accountants, auditors and fund administrators. We may also provide this information to companies that perform marketing services on our behalf or to other financial institutions with which we have joint marketing agreements. We require all third party service providers to protect the confidentiality of your information and to use the information only for the purposes for which it is disclosed.

We may also share information with our affiliates to market to you. If you are an individual or an Individual Retirement Account investor, you may prevent this type of sharing by calling us at (414) 294-7500. Please note that if you elect to limit this type of sharing, this means that we will not solicit you to invest in Funds in which you are not currently invested. Please also note that if you elect to limit this type of sharing, that for administrative purposes we will follow up your oral election with a written correspondence confirming such election. If this paragraph applies to you because of the type of investor that you are and you are a *new* investor, we can begin sharing your information 30 days from the date we sent this Privacy Notice. When you are *no longer* our investor, we may continue to share your information as described in this Privacy Notice. However, you may contact us at any time to limit our sharing. If you limit sharing for an account you hold jointly with someone else, your choices will apply to everyone on your account. State laws may give you additional rights to limit sharing.

If you are a resident of California and you are an individual investor or an Individual Retirement Account investor, you are provided with additional privacy rights and choices with respect to joint marketing agreements with companies we contract with to provide financial products and services to you. Specifically, you may prevent us sharing with companies for joint marketing purposes by calling us at (414) 294-7500. Please note that if you elect to limit this type of sharing, that for administrative purposes we will follow up your oral election with a written correspondence confirming such election. If you are a new investor residing in California, we can begin sharing your information for joint marketing purposes 30 days from the date we sent this Privacy Notice.

We do not otherwise provide information about you to outside firms, organizations or individuals although we will release information about you (i) if you direct us to do so, (ii) if compelled or allowed to do so by law, (iii) in connection with any government or self-regulatory organization request or investigation, or (iv) in order to reduce or eliminate any withholding or other taxes imposed upon the Funds or investors therein. We seek to carefully safeguard your private information and, to that end, restrict access to non-public, personal information about you to our employees and other persons who need to know the information to enable us to provide services to you. We maintain physical, electronic and procedural safeguards to protect your non-public, personal information.

Keeping your information accurate and up-to-date is very important to us. If you need to correct or update your personal information, please contact us at (414) 294-7500. For your protection, we recommend that you do not provide your account information to anyone. Please contact us immediately if you become aware of any suspicious activity relating to your account.