



Privacy Notice

FACTS	WHAT DOES SILVER ROCK FINANCIAL LP (“SILVER ROCK”) DO WITH YOUR PERSONAL INFORMATION?	
WHY?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.	
WHAT?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ▪ Social security number ▪ Account balances ▪ Investment experience ▪ Income ▪ Wire transfer instructions ▪ Transaction history 	
HOW?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons Silver Rock chooses to share; and whether you can limit this sharing.	
Reasons we can share your personal information	Does Silver Rock Share?	Can you limit this sharing?
For our everyday business purposes - such as to process your transactions, maintain your accounts(s) or respond to court orders and legal investigations.	Yes	No
For our marketing purposes - to offer our products and services to you	No	We don’t share
For joint marketing with other financial companies	No	We don’t share
For our affiliates’ everyday business purposes - information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes – information about your creditworthiness	No	We don’t share
For non-affiliates to market to you	No	We don’t share
Questions?	Contact Patrick Hunnius, Silver Rock’s General Counsel and Chief Compliance Officer, at phunnus@silver-rock.com or (424) 371-9753.	



SILVER ROCK
FINANCIAL

Page 2

Who we are

Who is providing this notice?

Silver Rock Financial LP

What we do

How does Silver Rock protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

How does Silver Rock collect my personal information?

We collect your personal information, for example, when you

- Enter into an investment advisory contract or subscription
- Give us your contact information
- Make deposits or withdrawals from your account
- Tell us where to send money or make a wire transfer
- Seek advice about your investments

We also collect your personal information from others, such as third-party service providers.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for non-affiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- *Our affiliates include financial companies, such as Silver Rock Management LLC.*

Non-Affiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *Silver Rock does not share with non-affiliates so they can market to you.*

Joint Marketing

A formal agreement between non-affiliated financial companies that together market financial products or services to you.

- *Silver Rock does not jointly market.*

For California Residents

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To request more information, please call (800) 747-1325 or email legal@silver-rock.com.

PRIVACY ADDENDUM FOR CALIFORNIA RESIDENTS

This addendum supplements the information contained in the Privacy Notice of Silver Rock Financial LP (together with its affiliates, “Silver Rock”, “we,” “us,” or “our”) and applies to any current, prospective or former investor, service provider or employee, as applicable, who is a natural person residing in the State of California (“consumers” or “you”). We adopt this addendum to comply with the California Consumer Privacy Act of 2018 (“CCPA”) as of January 1, 2020. Any terms defined in CCPA have the same meaning when used in this addendum. When you engage with us, you acknowledge that you have read and understand the contents of this addendum.

Type of Personal Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a consumer, household or device (“personal information”). Personal information does not include publicly available information from government records, de-identified or aggregated consumer information or information excluded from CCPA’s scope, such as personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA) or the Gramm-Leach-Bliley Act (GLBA).

We have collected the following categories of personal information from consumers within the last twelve months:

Category	Examples ¹	Collected ²
A. Identifiers.	Name, alias, postal address, IP address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	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 or any other financial information, medical information, or health insurance information.	YES
C. Protected classification characteristics under California or federal law.	Age, 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).	YES
D. Commercial information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.	NO
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history or performance evaluations.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
K. Inferences drawn from other personal information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO

¹ These are non-exhaustive examples for illustrative purposes only, and some information may overlap multiple categories. Silver Rock does not collect more information than is needed to conduct its business and satisfy any associated regulatory requirements.

² The categories of data collected by Silver Rock vary based on your relationship to Silver Rock (e.g., Silver Rock collects non-public education information about job applicants and employees but does not collect such information from investors).

For employees, we may collect additional information, such as the personal information of your spouse and dependents, in order to administer health, retirement and other benefit programs.

How We Collect Personal Information

We obtain personal information directly or indirectly from you or your agents and from third parties that interact with us in connection with services we perform. How we collect personal information varies depending on our relationship to you, but examples include: during the onboarding process of a client, vendor or employee relationship; in connection with transactions or potential transactions with you; and during our normal course of business. Third parties or other sources include our affiliate(s), professional employer organization, fund administrator or sub-administrator(s), publicly accessible databases or registers, tax authorities, governmental agencies and supervisory authorities, credit agencies, fraud prevention and detection agencies, or other publicly accessible sources, such as the Internet.

Use of Personal Information

We may use or disclose your personal information for a variety of purposes, including but not limited to, the following:

- For our everyday business purposes to administer, facilitate and manage your relationship and/or account with Silver Rock or to otherwise provide you with information, products or services that you request from us.
- To contact you or your authorized representative(s) in connection with your relationship and/or account.
- To monitor and audit compliance with our internal policies and procedures.
- To comply with and enforce applicable contractual, legal and regulatory requirements (including anti-money laundering and similar laws).
- To engage your services and comply with and enforce any contracts entered into between you and us, including for billing and collections (applicable to service providers, vendors, suppliers and business contacts).
- To fill open job positions as part of a recruiting process.
- To administer or facilitate payroll, benefits and other human resources services.
- To provide you with alerts and other notices concerning our products or services that may be of interest to you.

If your relationship with Silver Rock ends, we will continue to treat your personal information, to the extent we retain it, as described in this addendum.

Sharing Personal Information

We may disclose your personal information for a business purpose to a third party, who is or will be required to maintain the confidentiality of such information and is or will be prohibited from using your personal information for purposes other than to carry out the purposes for which we disclose the information. Examples of third parties with whom we may share your personal information include, but are not limited to:

- Authorized service providers who perform services to facilitate your transactions with Silver Rock, such as administrators, accountants, auditors, professional advisors, prime brokers, custodians, executing brokers and trading counterparties, customer relationship management, IT consultants, entities assessing our compliance with industry standards, payment processing, email delivery and other similar services.
- Human resources and benefits providers, co-employers or professional employer organizations and other authorized employment-related service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.
- Third parties in the event of any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business or assets stocks.
- Government or regulatory authorities in order to comply with appropriate laws, regulations and/or requests.

Categories of personal information that we share with third parties include Categories A, B, C, I and/or J above. The extent to which we share such information varies depending on our relationship with you.

We have not sold any personal information in the preceding twelve months.

Exercising Your CCPA Rights

CCPA provides consumers with specific rights regarding their personal information. You have the right to request information regarding our collection and use of your personal information no more than twice within a twelve-month period. You also have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions.

For your protection, a request must (a) provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative and (b) describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. Silver Rock will make a good faith effort to process your request without undue delay and within the timeframe provided by applicable law.

You may submit a request by calling (800) 747-1325 or emailing legal@silver-rock.com.

Changes to this Addendum

We reserve the right to update this addendum at any time to reflect changes in our policies concerning the collection and use of personal information. The revised addendum will be effective immediately upon posting to our web site.

* * *