

## **Qualis Capital, LLC Privacy Policy Notice**

Qualis Capital, LLC (“Qualis” or “we”) are committed to keeping the personal information collected from potential, current and former investors confidential and secure. The proper handling of non-public personal information is one of our highest priorities. We want to be sure that you know why we need to collect personal information from you. We also want to explain to you our commitment to protect the personal information you provide to us. We do not disclose non-public personal information about our investors or former investors who are individuals to unaffiliated third parties other than as described below as permitted by law.

### **Investor Information**

We may collect nonpublic, personal information about you (such as your name, address, tax identification number and bank account information) from our discussions with you, from documents, from use of our website ([www.qualiscapital.com](http://www.qualiscapital.com)) and from information that you may deliver to us, directly or indirectly through your agents such as your adviser, fiduciary or other broker-dealer.

We will also collect information about when you use our services or when we otherwise interact or correspond with you. We use various technologies to collect and store information when you visit our website. We may, for example, collect information, including through cookies, about the type of device you use to access the websites, your IP address and your geographic location, the operating system and version, your browser type, the content you view and features you access on our websites, the web pages and the search terms you enter on our websites.

### **Information Use**

We may do the following with your personal information:

- use it to provide services to you;
- use it to engage in marketing and business development activity in relation to our services - this may include sending you newsletters, updates, marketing communications and other information that may be of interest to you;
- to comply with legal, regulatory and compliance obligations that we have to discharge;
- use it to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- record and monitor your use of our website and our services for our business purposes which may include analysis of usage, measurement of website performance and generation of marketing information;
- use it for our legitimate business interests, such as undertaking business research and analysis, managing the operation of our websites and our business, or any merger, sale or similar business transaction;
- use it to answer or look into any complaints, questions or inquiries you may have;
- where you have applied for a position with us, to review and process your job application; and
- use it to prevent and respond to actual or potential fraud or illegal activities, including with respect to anti-money laundering compliance.

Also, we may collate, process and share any statistics based on an aggregation of information held by us provided that any individual is not identified from the resulting analysis and the collation, processing and dissemination of such information is permitted by law.

We collect and utilize your personal information under various grounds as permitted by applicable law:

- Consent – by using our services, you consent to our use of your personal information as described herein and in other disclosures provided to you. You can withdraw your consent by contacting us (see below) but withdrawing such consent may mean that we cannot provide you further services or continue servicing your existing relationship with us.
- Performance of a contract - we may need to collect and use your personal information to enter into or perform our obligations under an agreement with you or with a third party involving performing services to you or for your benefit.
- Legitimate interest - we may use your personal information for our legitimate business and legal interests, some examples of which are given above.
- Compliance with law and regulation - we may use your personal information as necessary to comply with applicable law and regulation, including with respect to your investment in a private fund.

### **Sharing Information**

We may provide your non-public personal information to our affiliates and to firms and vendors that assist us and have a need for such information in furtherance of our business and in providing services to you or for your benefit. We do not otherwise provide information about you to outside firms, organizations or individuals except to our attorneys, accountants, administrators, auditors and as permitted or required by law or requested or approved by you. With your approval, we also may share information with your advisors, which can include your investment adviser, broker-dealer, accountant and/or attorney. In the normal course of our business, we may disclose information we collect about you to unaffiliated companies or individuals that relate to the services we provide you or for your benefit, including ones that contract or interact with us to perform servicing functions such as:

1. assisting in effecting your investment;
2. record keeping and other administrative services;
3. website related services; and
4. good faith disclosure to regulators who have regulatory authority over us.

Companies we hire to provide support services are not authorized to use your personal information for their own independent purposes and are obligated to maintain confidentiality of such information. We limit their use of your personal information to the performance of the specific service we have requested. We do not provide your personally identifiable information to mailing list vendors or solicitors for any purpose. When we provide personal information to a service provider, we expect these providers to safeguard your information, to use the information only for the intended purposes and to abide by applicable law.

### **Employee Access to Information**

Only employees and registered persons with a valid business reason have access to your personal information. These employees are educated on the importance of maintaining the confidentiality and security of this information. They are required to abide by our information handling practices and procedures.

## **Protection of Information**

We maintain security standards to protect your information, whether written or electronic. We update and test our systems to ensure the protection and integrity of information. If disposed, your information will be destroyed, erased or made unreadable prior to its disposal.

## **Maintaining Accurate Information**

Our goal is to maintain accurate, up-to-date investor records in accordance with industry standards. If there is a change in the personal information you have given us, you should provide us with your updated information. When you or any other investor provides us with updated information, we will endeavor to update our records as soon as practicable.

## **Email**

Should you send us your questions and comments via email; we will share your correspondence with those employees or our service providers most capable of addressing your questions and concerns and if applicable with the managers and funds and their agents relevant to your investments. We will retain your communication in accordance with applicable law. Please note that, unless we expressly advise you otherwise, our email facilities, like other email facilities, do not provide a guaranteed means for completely secure and private communications between us and yourself.

Although every attempt will be made to keep your information confidential, from a technical standpoint, email communications still present a risk. For that reason, please do not use email to communicate information to us that you consider to be confidential. If you wish, you may contact us instead via telephone. Additional security is available to you if you properly password protect your attachments or equip your internet browser with 128-bit secure socket layer encryption, which provides more secure transmissions.

## **Further Information**

We reserve the right, at any time, to modify, alter, or update our Privacy Policy by making changes and then posting the revised Privacy Policy notice. The examples contained herein are illustrations and are not intended to be exclusive. As a member of the financial services industry, we are providing you this Privacy Policy notice in accordance with applicable law. It is also available to you upon request.

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**If you have any questions about our privacy policy, please contact our Chief Compliance Officer Jeffrey Lau at (212) 653-8374 or at [jeff.lau@qualiscapital.com](mailto:jeff.lau@qualiscapital.com).**

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