

Third Party Privacy Policy

At PPM we are committed to keeping non-public information about third parties (including clients and potential clients) secure and confidential. We do not disclose your information to anyone except as required by law, described in this policy, or as you otherwise permit. Most importantly, we do not sell your information to anyone.

INFORMATION WE MAY COLLECT AND USE

The personal information we collect is in association with our services and is used by PPM and the service providers and contractors we engage to assist us in providing financial services to our clients.

DISCLOSING OR SHARING PERSONAL INFORMATION

In order to run our business and provide our services and products, there are occasions where we may disclose or share your personal information with affiliates and non-affiliated vendors that perform support services for PPM (including, but not limited to: fund administrators, placement agents, transfer agents, servicers, custodian banks, legal representatives, etc.). These parties are subject to agreements that require them to maintain the confidentiality of your information and to use it only in the course of providing such services. We will also share information if you so direct or with your consent, if we are compelled by law or regulation, as part of a corporate transaction with a successor or affiliate or in connection with any acquisition, merger or sale of assets, or in other circumstances as permitted by law (for example, to protect your account from fraud).

It is important to note that PPM does not share your personal information with third parties for targeted advertising (i.e., cross-contextual advertising). Further, we have no actual knowledge that we collect or share the personal information of individuals under 16 years of age.

SAFEGUARDING INFORMATION

PPM recognizes that information security is a crucial topic. To protect information, we utilize an industry-standard information security program with certified and experienced professionals who strive to protect the integrity of our systems and applications. We implement precautions throughout our organization, including, where appropriate, the following: password protection, multi-factor authentication, encryption, Transport Layer Security (TLS), firewalls, and internal restrictions on who may access data to protect the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

We restrict access to personal information to authorized employees and in some cases to third parties as permitted by law. In addition to the requirements in this policy, we maintain physical, electronic and procedural safeguards to guard sensitive information. PPM adheres to these standards even after a business relationship ends.

To learn more about how PPM protects your personal information, please visit the [Cybersecurity](#) page of PPM's affiliate responsible for PPM's information security.

INSTRUCTIONS FOR SUBMITTING A REQUEST

PPM complies with all applicable laws and regulations governing rights with respect to personal information and administers the rights described in this notice in accordance with specific laws and regulations. Your state may provide for additional privacy protections under applicable laws. PPM will protect your information in accordance with these additional protections.

If you would like to act upon your rights regarding your personal information, please use this [link](#) to submit a request, or email PPMPrivacyOperations@ppmamerica.com. Upon submission of your request we will take commercially reasonable steps to verify your identity and, if applicable, your authorized agent's identity before granting access or making any changes to your personal information. You will be required to verify your identity by providing general information such as your first name, last name, and email address. In some instances we may reach out to you directly to provide other information, such as your mailing address. Only you, or an agent authorized to act on your behalf, may make a verifiable consumer request related to your personal information.

We will make good faith efforts to provide you with access to your data when you request it, but there may be circumstances in which we need not provide access as allowed by law, including but not limited to instances where the information contains legal privilege, where your identity could not be verified, or where the information may compromise yours or others' privacy or other legitimate rights. If we determine that access should be restricted in any particular instance, we will provide you with an explanation of why that determination has been made and a contact point for any further inquiries.

CHANGES TO NOTICE

This notice provides a general statement with details to help you understand our current privacy policies and how PPM protects your personal information. You may, however, in connection with specific products or services offered by PPM, be provided with privacy policies or statements that supplement this notice. PPM reserves the right to change this notice, its privacy policies, or any supporting or related policies or procedures at any time. If there are any changes to the terms of this notice or PPM's privacy policies, documents containing the revised

notice and policy will be updated, including our website at the [PPM Privacy Policies](#) or at <https://www.ppmamerica.com/privacy-policy>, and will be effective immediately. Contact us at privacy@ppmamerica.com should you have any questions about this notice, our privacy policy, our privacy commitments or our website.

Click [HERE](#) to download a printable copy.

This notice was last updated on July 10, 2025.