



Wealth Management Solutions, LLC
NOTIFICATION OF PRIVACY POLICIES AND PRACTICES
(“Privacy Notice”)

Maintaining the confidentiality and security of the personal information of our current and prospective investors is one of our highest priorities. This notice sets forth the type of personal information we collect, how that information is used by us, and how we protect your personal information.

Information We Collect

In connection with forming and operating our private investment funds (the “funds”) for our investors, non-public personal information is collected from the following sources:

From You: We collect information from you in conversations over the telephone, in voice mails, through written correspondence, via e-mail and other electronic communications or in subscription agreement, investor agreements, investor questionnaires, applications or other forms (including, without limitation, any anti-money laundering, identification, and verification documentation) that you complete when requesting information or services from us. This information may include, among other things, items such as your name, address, email address, social security number, birth date, annual income, net worth, and marital status.

From Transactions: We collect information about your transaction with us or others and keep records of advice or services we provide. We keep records relating to items such as your account balance and payment history, which enables us to resourcefully service your account.

From our Web Site, Fund Data room and/or Investor Reporting Portal: If you visit our website, we may use a so-called cookie to track the amount of time you spend on our site, the parts of our site you visited, and other technical information. We use this information to improve the functionality of our web site. Additionally, we collect registration information and information provided through online forms. Your personal information is collected and maintained by us so we may develop, offer, and deliver products and services to you, process transactions in your account, and fulfill our legal and regulatory requirements.

Information We Disclose

We do not disclose any non-public personal information about our investors or former investors to anyone, except as permitted or required by law, or as necessary to affiliates and services providers. We may disclose all of the information we collect, as described above, to certain non-affiliated third parties such as, but not limited to, fund administrators, attorneys, accountants, auditors, compliance and other consultants, banks, lenders, governmental agencies and other persons or entities to enable us to provide requested services to you and to comply with legal and regulatory requirements, as well as pursuant to legal process and to self-regulatory organizations.

Protection of Your Personal Information

Our employees may, from time to time, have access to your personal information in order to provide services to the funds and to you. All employees are subject to the terms of our company’s compliance manual, which requires employees to treat confidentially all information obtained from or about you or your account. We also maintain physical, electronic, and procedural safeguards designed to protect nonpublic personal financial information.

Further Information

We reserve the right to change our privacy policies and this Privacy Notice at any time. Any examples contained within this notice are illustrations only and are not intended to be exclusive. This notice complies with the privacy provisions of Regulation S-P under the Gramm-Leach-Bliley Act and certain privacy provisions of other laws. You may have additional rights under other foreign or domestic laws that apply to you, including as set forth in our additional and/or supplemental privacy notices.

PRIVACY NOTICE SUPPLEMENT FOR CALIFORNIA RESIDENTS

This notice supplements the Privacy Notice set forth above with respect to specific rights granted under the California Consumer Privacy Act of 2018 (the “CCPA”) to natural person California residents and provides information regarding how such California residents can exercise their rights under the CCPA. This supplement is only relevant to you if you are a resident of California as determined in accordance with the CCPA. Information required to be disclosed to California residents under the CCPA regarding the collection of their personal information that is not set forth in this CCPA supplement is otherwise set forth above in the Privacy Notice. To the extent there is any conflict with the privacy requirements under the Gramm-Leach-Bliley Act and/or Regulation S-P (“GLB Rights”), GLB Rights shall apply.

Categories of Personal Information We Collect

We have collected some or all of the following categories of personal information from individuals within the last twelve (12) months:

- Identifiers, such as name, contact details and address (including physical address, email address and Internet Protocol address), and other identification (including social security number, passport number and drivers’ license or state identification card number);
- Other customer records, such as telephone number, signature, bank account number, other financial information (including accounts and transactions with other institutions and anti-money laundering information), and verification documentation and information regarding investors’ status under various laws and regulations (including social security number, tax status, income and assets);
- Protected classification characteristics under California or federal law, such as date of birth, citizenship and birthplace;
- Commercial information, such as account data and other information contained in any document provided by investors to authorized service providers (whether directly or indirectly), risk tolerance, transaction history, investment experience and investment activity, information regarding a potential and/or actual investment in the applicable fund(s), including ownership percentage, capital investment, income and losses, source of funds used to make the investment in the applicable fund(s); and
- Internet or other electronic network activity information, such as information regarding your use of our website, fund data room and investor reporting portal (e.g., cookies, browsing history and/or search history), as well as information you provide to us when you correspond with us in relation to inquiries.

Within the last twelve (12) months, we have shared each of the categories of personal information collected with affiliates and third-party service providers as set forth in “**Information We Disclose**” in the Privacy Notice above, and we collect personal information from the sources set forth in “**Information We Collect**” in the Privacy Notice above.

Purposes for Collecting Personal Information

We may collect or share the personal information we collect about you for one or more of the following business or commercial purposes:

- performing services to you, including but not limited to:
 - the administrative processes (and related communication) in preparing for the admission of investors to the fund(s);
 - ongoing communication with potential investors, their representatives, advisors and agents (including the negotiation, preparation and signature of documentation) during the process of admitting potential investors to the fund;
 - the performance of obligations under the governing documents of the funds (and all applicable anti-money laundering, KYC and other related laws and regulations) in assessing suitability of potential investors in the applicable fund;
 - ongoing operations, administrative, accounting, reporting, account maintenance and other processes and communication required to operate the business of the funds in accordance with its governing documents and other documentation between the parties, including customer service, processing or fulfilling transactions, verifying personal information, processing contributions and distributions and financing;
 - keeping investors informed about the business of the general partner or managing member of the applicable fund and its affiliates generally, including offering opportunities to make investments other than to the applicable fund and related advertising;
- auditing and verifications related to investor interactions, including but not limited to, verifying the quality and effectiveness of services and compliance;
- detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity; and
- complying with U.S., state, local and non-U.S. laws, rules and regulations.

WE DO NOT SELL ANY OF THE PERSONAL INFORMATION WE COLLECT ABOUT YOU TO THIRD PARTIES.

Deletion Rights

You have the right to request that we delete any of your personal information that we retain, subject to certain exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations.

Disclosure and Access Rights

You have the right to request that we disclose to you certain information regarding our collection, use, disclosure and sale of personal information specific to you over the last twelve (12) months. Such information includes:

- The categories of personal information we collected about you;
- The categories of sources from which the personal information is collected;
- Our business or commercial purpose for collecting such personal information;
- Categories of third parties with whom we share the personal information;
- The specific pieces of personal information we have collected about you; and
- Whether we disclosed your personal information to a third party, and if so, the categories of personal information that each recipient obtained.

No Discrimination

We will not discriminate against you for exercising your rights under the CCPA, including by denying service, suggesting that you will receive, or charging, different rates for services or suggesting that you will receive, or providing, a different level or quality of service to you.

How to Exercise Your Rights

To exercise any of your rights under the CCPA, or to access this notice in an alternative format, please submit a request using any of the methods set forth below.

Via email: to david@wmsus.com

Telephone: please submit your request and telephone number by email to david@wmsus.com and we will call you between 9 a.m. and 6 p.m. Pacific Time.

We will contact you to confirm receipt of your request under the CCPA and request any additional information necessary to verify your request. We verify requests by matching information provided in connection with your request to information contained in our records. Depending on the sensitivity of the request and the varying levels of risk in responding to such requests (for example, the risk of responding to fraudulent or malicious requests), we may request your investor portal access credentials in order to verify your request. You may designate an authorized agent to make a request under the CCPA on your behalf, provided that you provide a signed agreement verifying such authorized agent's authority to make requests on your behalf, and we may verify such authorized person's identity using the procedures above.

Our goal is to respond to any verifiable consumer request within forty-five (45) days of our receipt of such request. We will inform you in writing if we cannot meet that timeline. Please contact David Rosenthal, the Chief Compliance Officer of Wealth Management Solutions, LLC at david@wmsus.com with any questions about this Privacy Notice.