A.P. Gilfoyle

CCPA Investor Privacy Notice

By investing in a fund managed by A.P. Gilfoyle Investment Management LLC, a Delaware limited liability company (each, a "Fund") and providing your personal information or the personal information of your directors, officers, employees, and/or beneficial owners (i.e., information that identifies, relates to, describes, or is reasonably capable of being associated with you) to us, we may process such personal information. We have certain notice obligations under the California Consumer Privacy Act ("CCPA") and we use this privacy notice to fulfil those CCPA obligations.

For the purposes of this privacy notice, the words "you" and "your" mean only California residents investing in a Fund (as identified in your subscription agreement) and providing personal information to the Fund. Please ensure that you provide a copy of this privacy notice to any third parties whose personal information you provide to us.

What Personal Information Do We Collect?

We may collect some or all of the following categories of personal information:

- identifiers such as your name, address, and contact details, including email address and telephone number;
- personal information described in subdivision (e) of Section 1798.80 (California customer records statute) such as your passport details including your name, picture, signature, and number, bank account details, and details of your net worth and/or source(s) of wealth;
- commercial information such as the investment products you invest in;
- professional or employment related information such as job history;
- education information;
- internet/electronic activity such as browsing history and search history; and
- any other personal information you voluntarily provide to us.

We may also collect your personal information listed in the categories above from third parties, such as your investment adviser, family office representative, the organization to which you are affiliated, or other person designated by you to manage your investments, and third-party data services.

What Is Your Personal Information Used For?

We may use your personal information in order to:

- review and process your subscription agreement and supporting materials in connection with your investment in a Fund;

- enforce or defend our rights, ourselves or through third parties to whom we delegate such responsibilities;

- administer and manage investments and communications with you;

- administer, manage, and improve our fundraising operations;

- fulfill our legal and regulatory obligations (e.g., when we are required to conduct "Know Your Customer" checks); and

- any other purposes relating to the above.

When we conduct "Know Your Customer" and related anti-money laundering and sanctions' law checks, we use third party data services. Those services access information published by government authorities, as well as information available both in the public domain and from proprietary news and related sources. That information may or may not identify you. If it does, it could involve the processing of criminal records or other sensitive data. We will process all personal information, whether obtained from you or third parties, for the limited purposes described above and as authorized by law.

Failure to provide personal information in whole or in part could make it impossible for us to proceed with the application to invest in a Fund and we may be unable to process or release your investment in a Fund. This may result in us terminating our relationship with you.

We will not use your personal information for purposes materially unrelated to the foregoing, such as direct marketing of third-party products to you, without providing you notice of such use and obtaining your consent.

Changes To This Privacy Notice

We periodically review and may modify this privacy notice. If we make modifications, we will continue our commitment to keeping your personal information secure.