

#### MILLBANK DARTMOOR PORTSMOUTH

**Privacy Notice** 

Effective Date: January 1, 2024

### Introduction

Millbank Dartmoor Portsmouth LLC, ("MDP") the "Adviser", is committed to protecting the privacy and confidentiality of personal information we collect from Investors for the accounts we manage or consult. This Privacy Policy describes our policies and practices regarding the collection, use, and sharing of personal information.

#### **Collection of Personal Information**

We may collect the following types of personal information from our Investors:

- Contact Information: Name, address, email address, telephone number.
- **Financial Information:** Investment history, account balances, transaction history, bank account details.
- **Identification Information:** Social Security number, tax identification number, passport number, driver's license number.
- Other Information: Any other information you provide to us in connection with your investment.

### **Use of Personal Information**

We use the personal information we collect for the following purposes:

- To provide consulting and investment advisory services.
- To manage and administer your investments in your separately managed account(s).
- To comply with legal and regulatory requirements.
- To communicate with you about your account(s) and provide customer support.
- To conduct due diligence and verify your identity.

### **Sharing of Personal Information**

We do not sell or rent your personal information to third parties. We may share your personal information in the following circumstances:

• **Service Providers:** With third-party service providers who assist us in operating our business and providing services to you, such as custodians, auditors, and legal advisers.

These service providers are required to protect your information and use it only for the purposes we specify.

- **Affiliates:** With our affiliates for internal business purposes, including servicing your accounts and informing you about products and services that may be of interest to you.
- Legal and Regulatory Compliance: As required by law, regulation, or legal process, or to protect the rights, property, or safety of the Adviser, our clients, or others. It may also be necessary, under anti-money laundering regulations or other similar laws and regulations, to disclose information about you to facilitate the establishment of trading relationships for Investors with prime broker(s), custodian(s), executing broker(s), or other trading counterparties.
- **Business Transfers:** In connection with the sale, merger, or transfer of all or part of our business.

# **Security of Personal Information**

We implement reasonable physical, electronic, and procedural safeguards to protect your personal information from unauthorized access, use, or disclosure. We restrict access to your personal information to those employees and service providers who need to know that information to provide services to you.

## **Your Choices**

You have the right to:

- Access and Correct Your Information: Request access to the personal information we hold about you and ask us to correct any inaccuracies.
- **Opt-Out:** Opt-out of receiving marketing communications from us by contacting us at the address provided below.

### **Changes to This Privacy Policy**

We may update this Privacy Policy from time to time. When we make changes, we will update the effective date at the top of this policy and provide you with notice as may be required by law. We encourage you to review this policy periodically to stay informed about our privacy practices.

## **Contact Us**

If you have any questions or concerns about this Privacy Policy or our privacy practices, please contact us at:

Millbank Dartmoor Portsmouth LLC ATTN: Compliance Department 22 South Pack Square

Asheville, NC 28801

Email: compliance@mdpvol.coom

Phone: 828.499.7222