

## Privacy Notice For U.S. Retail Investors

### FACTS

#### What does Highbridge Capital Management, LLC do with your personal information?

#### Why?

Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

#### What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include:

- Social Security number and income
- Account balances and transaction history
- Wire transfer instructions and assets

When you are *no longer* our customer, we continue to share your information as described in this notice.

#### How?

All financial companies need to share customers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' personal information; the reasons Highbridge Capital Management, LLC chooses to share; and whether you can limit this sharing.

### Reasons we can share your personal information

Does Highbridge  
Capital  
Management, LLC  
share?

Can you limit this  
sharing?

For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus

Yes

No

For our marketing purposes – to offer our products and services to you

Yes

No

For joint marketing with other financial companies

No

We don't share

For our affiliates' everyday business purposes – information about your transactions and experiences

Yes

No

For our affiliates' everyday business purposes – information about your creditworthiness

No

We don't share

For our affiliates to market to you

No

We don't share

For nonaffiliates to market to you

No

We don't share

Questions?

Call 1-212-287-9800



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## Who we are

<b>Who is providing this notice?</b>	Highbridge Capital Management, LLC
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## What we do

<b>How does Highbridge Capital Management, LLC protect my personal information?</b>	To protect your personal information from unauthorized access and use, we use security measures designed to comply with federal law. These measures include computer safeguards and secured files and buildings.  We authorize our employees and agents to access your information only when they need it to do their work and we require companies that work for us to protect your information.
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<b>How does Highbridge Capital Management, LLC collect my personal information?</b>	We collect your personal information, for example, when you: <ul style="list-style-type: none"> <li>• enter into an investment advisory contract</li> <li>• give us your income information or give us your contact information</li> <li>• make a wire transfer or provide account information</li> </ul> We also collect your personal information from others, such as credit bureaus, affiliates and other companies.
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<b>Why can't I limit all sharing?</b>	Federal law gives you the right to limit only: <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for nonaffiliates to market to you</li> </ul> State laws and individual companies may give you additional rights to limit sharing.
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## Definitions

<b>Affiliates</b>	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• Highbridge Capital Management, LLC <i>does not share with affiliates.</i></li> </ul>
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<b>Nonaffiliates</b>	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>• Highbridge Capital Management, LLC <i>does not share with nonaffiliates so they can market to you.</i></li> </ul>
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<b>Joint Marketing</b>	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>• Highbridge Capital Management, LLC <i>doesn't jointly market.</i></li> </ul>
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## **Privacy Notice for Investors in the European Economic Area and Investors in Cayman Islands-Domiciled Funds Managed by Highbridge**

### **Policy Scope**

This notice sets forth the privacy practices of Highbridge Capital Management, LLC (“Highbridge”) on behalf of the private investment funds managed by Highbridge with respect to the personal data of investors (each, an “Investor”) in such funds. Certain private investment funds domiciled in the Cayman Islands managed by Highbridge are subject to the Data Protection Act (As Revised) of the Cayman Islands, and the contents of this Privacy Notice also describe how personal information they collect, or is collected on their behalf, is managed. This Privacy Notice applies to Investors in Cayman Islands-domiciled funds and otherwise to investors located in the European Economic Area (“EEA”) and/or Switzerland. Highbridge Capital Management, LLC, as a non-EEA entity, has appointed J.P. Morgan A.G. as the data protection representative in the EEA.

### **Collection of Personal Data**

Highbridge may collect certain personal data with respect to Investors, including (a) information received from an Investor, such as social security number, account information and wire transfer instructions and (b) information about an Investor’s transactions with any affiliates or non-affiliates, such as account balances, account numbers and account activity. If an Investor is an entity investor that provides Highbridge with personal data on individuals connected to the Investor for any reason in relation to its investment with Highbridge, this will be relevant for those individuals and the Investor should transmit this Privacy Notice to such individuals or otherwise advise them of its contents.

### **Processing of Personal Data**

The processing of personal data by Highbridge may be necessary in order for Highbridge to provide the Investor with the requested services, for the performance of any contractual relationship between the fund(s)/Highbridge and the Investor and for the other purposes as set out in this Notice where in Highbridge’s legitimate interests and such interests are not overridden by the Investor’s interests, fundamental rights and freedoms. Where Highbridge requires personal data to comply with its legal requirements, failure to provide this data means Highbridge may not be able to accept the Investor or may result in the relationship with the Investor being terminated.

Where an Investor discloses personal data relating to criminal convictions or offences to Highbridge (e.g., pursuant to a bad actor disclosure), Highbridge will only process such personal data where authorized by applicable law. Investors have a right to object to processing of their personal data where that processing is carried out for Highbridge’s legitimate interest or for direct marketing.

Please see the following table, which describes the purposes of processing and the legal basis for processing your personal data:

## Purposes of Processing and Legal Basis for Processing

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***Your personal data may be processed by us (or any of our affiliates or (sub) contractors for the following purposes:***

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- to manage and administer your holdings in the relevant fund, including assessing and processing applications, redemptions and distributions and communicating with you about your holdings and account related activities on an on-going basis;
- to update and maintain records;
- to manage and maintain our relationships with you and for ongoing client service;
- to enforce or defend our rights, ourselves or through third parties to whom we delegate such responsibilities;

***This use of your personal data is necessary for performance of your contract with us.***

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- to share data with law enforcement, tax authorities or other government and fraud prevention agencies where we have a legal obligation;
- to investigate and resolve complaints and manage investigations and litigation;
- to monitor electronic communications for investigation and fraud prevention purposes, crime detection, prevention and investigation;
- to comply with any of our applicable legal, tax or regulatory obligations, including those that derive from anti-money laundering (“AML”) and counter-terrorism legislation;

***This use of your personal data is necessary in order for us to comply with our legal or regulatory obligations.***

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- the day-to-day running and management of the funds and our business including to:
  - monitor, maintain and improve our processes;
  - perform general, financial and regulatory accounting and reporting;
  - monitor and record calls for quality, business analysis, training and related purposes;
  - protect our legal rights and interests including screening transactions for fraud prevention and AML purposes;
  - share such personal data with third parties that acquire or are interested in acquiring all or part of our assets or shares, or that succeeds us in carrying on our business;

***This use of your personal data is necessary for our legitimate business interests in managing our business including for legal, personnel, administrative and management purposes and for the prevention and detection of crime, provided our interests are not overridden by your interests, fundamental rights and freedoms.***

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- to contact you to tell you about products and services offered by us which we believe may interest you unless you advise us that you do not wish to receive marketing or market research communications from us.

***If applicable law requires that we receive your consent before we send you certain types of marketing communications, we will only send you those types of communications after receiving your consent. If you wish to stop receiving marketing or market research communications from us you can unsubscribe via the link at the bottom of the relevant marketing email or contact us using the contact details below.***

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***Disclosure of Personal Data to Third Parties***

Highbridge may disclose certain personal data: (i) to its affiliates, service providers, such as transfer agents, fund administrators, auditors, custodians, broker-dealers and other counterparties; (ii) to fraud prevention agencies and law enforcement agencies; (iii) to courts, governmental and non-governmental regulators and ombudsmen; (iv) to any third party that acquires, or is interested in acquiring, all or part of Highbridge's assets or shares, or that succeeds Highbridge in carrying on all or a part of its business, whether by merger, acquisition, reorganization or otherwise; or (v) as required or permitted by law, including to comply with a subpoena or similar legal process or government request, or when Highbridge believes in good faith that disclosure is legally required or Highbridge has a legitimate interest in making a disclosure, such as where necessary to protect Highbridge's rights and property. Such persons may be data processors or controllers in their own right.<sup>2</sup>

***International Transfers of Personal Data***

Due to the international nature of our business, Highbridge may disclose Investor personal data to recipients (including other Highbridge entities and third-party service providers) located in countries outside of the EEA or the Cayman Islands, as applicable (including in the US), which may not have data privacy laws equivalent to those in the EEA or the Cayman Islands. By submitting their personal data directly to Highbridge Capital Management, LLC, each Investor consents to the transfer of their personal data to Highbridge Capital Management, LLC in the US. Investors may withdraw their consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

All other international transfers of personal data to recipients as described in this Notice will be made on the basis of: (i) our Binding Corporate Rules; or (ii) other valid transfer mechanisms in accordance with relevant data protection laws. If an Investor wants to receive further information about these safeguards he/she should contact the Highbridge Investor Relations Department at (212) 287-9800 or e-mail J.P. Morgan Asset Management Privacy Control at [am.data.privacy.control@jpmorgan.com](mailto:am.data.privacy.control@jpmorgan.com). A link to the Group Binding Corporate Rules is included here: <https://www.jpmorgan.com/country/GB/EN/privacy>

***Data Retention***

Highbridge will retain Investor personal data for a period of seven (7) years from the date on which the Investor redeems all of its shares or interests in the relevant fund or for as long as required for Highbridge to perform the necessary services or comply with applicable legal/ regulatory obligations.

***Personal Data Rights of Investors***

Subject to applicable data privacy laws, Investors have a right to: (i) request access to and rectification or erasure of their personal data; (ii) obtain restriction of processing or to object to processing of their personal data including where in relation to direct marketing; and (iii) data portability. If an Investor wishes to exercise any of these rights he/she should contact the Highbridge Investor Relations Department at (212) 287-9800 or e-mail J.P. Morgan Asset Management Privacy Control at [am.data.privacy.control@jpmorgan.com](mailto:am.data.privacy.control@jpmorgan.com). Investors also have the right to lodge a complaint about the processing of their personal data with their local data protection authority or in respect of a Cayman Islands-domiciled fund, the relevant authority under Cayman Islands data protection laws.

<sup>2</sup> Additionally, service providers to private investment funds managed by Highbridge, such as HedgeServ (Cayman) Ltd. (together with its authorized delegates, the "Administrator"), may use Investor personal data, for example, to provide their services to the funds or to discharge the legal or regulatory requirements that apply directly to them or in respect of which the funds rely upon the Administrator or such other service providers, but such use of Investor personal data by the Administrator or such other service providers will always be consistent with at least one of the aforementioned purposes for which Highbridge processes Investor personal data. Further explanation regarding how the Administrator may handle Investor personal data is set out in the Administrator's privacy notice, which is available at <https://www.hedgeserv.com>.