

## **General Data Protection Regulation (GDPR) Privacy Notice**

### **For EU Clients**

#### **Dalal Street LLC & Dhandho Funds LLC (Collectively “Adviser”)**

We are sensitive to the privacy concerns of our current and former individual limited partners and clients. We have a long standing policy of protecting and respecting the privacy of our current and former clients. This privacy notice (the “Privacy Notice”) sets out our policy on when and how we use your personal information, meaning any information that can directly or indirectly identify you (“Personal Data”). Please read this Privacy Notice carefully to understand what we do with your Personal Data. For European Union data protection purposes, Adviser is the data controller.

#### **Personal Data we may collect:**

The types of Personal Data we collect about clients typically includes:

- your name, address, email address, date of birth, social security number and/or tax id number, assets income, investment experience and/or identification documents in order to know our clients;
- accredited investor or qualified purchaser status pertaining to investor eligibility standards;
- information about transactions with Adviser, including wire instructions, bank details, and account activity; and
- any other information required by applicable laws.

Adviser collects this information through limited subscription documents and related forms, and communications with Adviser employees. Failure to provide us with this Personal Data may affect how we provide our services to you.

#### **How we use your Personal Data**

We will use Personal Data provided to us by clients in the normal course of business and where basic law exists for purposes such as the execution of subscription/investment management agreements, the legitimate interests of Adviser and to enable Adviser in complying with its legal and regulatory obligations. In this regard, client information is used for a number of purposes, including:

- To initiate and process the investment services you request;
- To perform our obligations under anti-money laundering and other laws, such as Foreign Account Tax Compliant Act;
- To ensure our records are complete and accurate;
- To provide the specific services agreed by you;
- To undertake performance analysis and management of the business;
- To give you information that you request from us and to improve our services;
- To notify you about changes to our services;
- To inform you of events that may be of interest to you and
- Any relevant testing or statistical analysis as appropriate

Less commonly, we may process this type of Personal Data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent.

### Lawful basis of processing

We will only process your information as long as we have relevant lawful basis to do so. All of the information collected and detailed in the sections above is processed to provide you with the contractual services you have requested from Adviser unless stated otherwise in the ‘Personal Data we may collect’ section, or if you have provided us with adequate consent to process your information for other purposes.

If we choose to process your information under the lawful basis of legitimate interests, we will always inform you of our legitimate business interest and your right to object. If you choose to access your Personal Data under the rights afforded to you by data protection legislation, we will always inform you of the lawful basis under which we process your information.

### Data retention

We will only retain your Personal Data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements.

### How we protect your Personal Data:

To protect your Personal Data from unauthorized access and use, we use security measures that comply with regulations of the US SEC, applicable data protection laws, and other pertinent regulatory bodies. These measures include computer safeguards and secured files and buildings that are generally accepted in the industry to protect Personal Data.

### Personal Data we disclose:

Adviser does not disclose or sell Personal Data about our current or former clients to any third parties, except to trusted third parties so designated by Adviser, who assist us in conducting our business, or servicing you (“Trusted Third Parties”). We may transmit your Personal Data to Trusted Third Parties. We will only transmit your Personal Data to Trusted Third Parties following their agreement and commitment to keep all Personal Data confidential. This Personal Data is given to Trusted Third Parties based on our instructions and in compliance with our Privacy Notice and any other confidentiality and security measures. We may also release your Personal Data when we believe such release is necessary to comply with applicable laws, enforce our policies, or protect Adviser’s legal rights, property, or safety, or those of third parties.

### Transfer of Personal Data outside the EU:

The Adviser may transfer and store Personal Data in servers located outside of the EU. Such Personal Data maintained outside the EU will be transferred and processed in accordance with applicable data protection laws. By submitting Personal Data to the Adviser, each client consents to that transfer of their Personal Data to Adviser and other recipients (such as Trusted Third Parties) as described in this notice that may be located in countries outside the EU.

### Your rights:

Where clients are located in EU, they may, subject to applicable restrictions and exceptions:

- request access to, rectification or reassurance of their Personal Data;
- request that the processing of their Personal Data be restricted;
- object to the processing of their Personal Data; and
- request a copy of their Personal Data to be provided to them or a third party.

Clients have the right to issue a complaint against the Adviser with a supervisory authority. Please note that clients have a right to object the processing of their personal information where that processing is carried out for Adviser's legitimate interest. You can always opt-out of any of these communications by contacting the number below.

Questions or concerns:

If you have questions or concerns about our use of the Personal Data you provide, or if you are a client in the EU that wishes to exercise your rights, please contact us Kimberly Engleman at +1 512-999-7110.