

IMPORTANT INFORMATION ABOUT YOUR PRIVACY

BECAUSE YOUR TRUST IS IMPORTANT TO US

Your trust is the cornerstone of our relationship. That is why we work so diligently to safeguard your privacy. The information that you provide us is kept in the strictest of confidence. We have no intentions of selling personal information about our clients to third-party businesses. We are proud to make that commitment to you, because your trust is the foundation of our business.

The following privacy policy explains how we use and protect the information about our clients. We ask that you read it carefully.

NOTICE OF YOUR FINANCIAL PRIVACY RIGHTS

We, our and **us**, when used in this notice, mean SKY Harbor Capital Management, LLC (“SKY Harbor”).

This is our privacy notice for our clients. When we use the words “you” and “your” we mean the following types of clients:

- Any account or fund for which SKY Harbor provides investment advice or places trades on a discretionary or nondiscretionary basis, and may include accounts or funds in which SKY Harbor, its members, officers, employees or affiliates may have an interest.
- Former Clients
- Prospective Clients

We will tell you the sources of the information we collect about you. We will tell you what measures we take to secure that information. We first define some terms.

Nonpublic personal information means information about you that we collect in connection with providing a financial product or service to you. To help the government fight the funding of terrorism and money laundering activities, Federal law requires certain financial institutions to obtain, verify and record information that identifies each person who opens an account. Therefore, when you open an account, we will ask for your name, address, date of birth and other information that will allow us to identify you. We may also ask to see your driver’s license or other identifying documents. Federal law requires us to screen new clients through the Office of Foreign Assets Control “Specially Designated National & Blocked Persons” list and/or the Financial Crimes Enforcement Network (FinCEN).

Nonpublic personal information does not include information that is available from public sources, such as telephone directories or government records. Hereafter, we will use the term “*information*” to mean nonpublic personal information as defined in this section.

An **affiliate** is a company we own or control, a company that owns or controls us or a company that is owned or controlled by the same company that owns or controls us. Ownership does not mean complete ownership but means owning enough or through contractual means to have control. Our affiliates include SKY Harbor Capital Management GmbH and comingled investment funds with the “SKY Harbor” name such as “SKY Harbor Global Funds” or “SKY Harbor Short Duration High Yield Partners LP.”

A **nonaffiliated third party** is a person we do not employ or a company that is not an affiliate of ours. This is also known as nonaffiliated third party, or simply, an “*other party*.”

THE INFORMATION WE COLLECT

We collect information about you from the following sources:

- Information you give us on applications or other forms
- Information about your transactions with us
- Information about your transactions with our affiliates and their service providers
- Information about you from investment consultants, fiduciaries, third party marketers or other intermediaries with whom we have written agreements with appropriate confidentiality provisions

INFORMATION WE DISCLOSE ABOUT YOU

We do not disclose any information about you to anyone, except as permitted by law. This might include disclosures necessary to service your account, perform joint marketing, prevent unauthorized transactions or comply with regulatory obligations.

Destruction of Sensitive Data. Confidential records and data are properly shredded prior to disposal. Destruction of documents is handled by authorized employees and/or bonded companies when the shredding of large quantities of documents is required.

THE CONFIDENTIALITY, SECURITY AND INTEGRITY OF YOUR INFORMATION

We restrict access to information about you to those employees who need to know that information to provide products or services to you. We maintain physical, electronic and procedural safeguards to protect this information.

INFORMATION ABOUT FORMER AND PROSPECTIVE CLIENTS

We have the same policy about disclosing information about former and prospective clients as we do about current clients.

OUR WEBSITE www.skyhcm.com

We do not retrieve account or personal information from visitors who browse the public areas of our website. SKYHCM.com does use “HTTP cookies”—tiny pieces of information that we ask of these cookies for website statistical information only. We do NOT use them to learn your email address or to view data in cookies created by other websites. We will not share the information in our cookies or give others access to it.

For further information please also refer to the accompanying SKY Harbor Capital Consumer Privacy Notice.

Any questions or requests for further information may be emailed to info@skyhcm.com.

FACTS**WHAT DOES SKY Harbor Capital Management, LLC ("SKY Harbor Capital") 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 transaction history
- Assets and account transactions
- Account balances and wire transfer instructions

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 **customer's** personal information to run their everyday business. In the section below, we list the reasons financial companies can share their **customer's** personal information; the reasons **SKY Harbor Capital** chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does SKY Harbor Capital 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	Yes	No
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	Yes	No
For nonaffiliates to market to you	No	We don't share

Questions?

Call 203 769-8800 or go to www.skyhcm.com

Who we are

Who is providing this notice?

SKY Harbor Capital Management, LLC

What we do

How does **SKY Harbor Capital** protect my personal information?

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

We restrict access to your information to only those employees, agents and service providers who have a need to know in order to provide products and services to you.

How does **SKY Harbor Capital** collect my personal information?

We collect your personal information, for example, when you

- open an account or give us your contact information
- make a wire transfer or provide account information
- enter into an investment advisory agreement

We also collect your personal information from investment consultants, third party marketers or other intermediaries with whom we have written agreements with appropriate confidentiality provisions.

Why can't I limit all sharing?

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies.

- Our affiliates include SKY Harbor Capital Management GmbH and comingled investment funds with the "SKY Harbor" name such as "SKY Harbor Global Funds" or "SKY Harbor Short Duration High Yield Partners LP."

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *SKY Harbor Capital does not share with nonaffiliates so they can market to you.*

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

- *Our joint marketing partners include banks, private wealth advisers, and third party marketers.*

Other important information

For further information please visit www.skyhcm.com and www.skyharborglobalfunds.com. You may also contact us by email at info@skyhcm.com for further information or questions.