

MITTLEMAN BROTHERS
INVESTMENT MANAGEMENT

Dated 03/2021

PRIVACY NOTICE

Mittleman Investment Management, LLC (together with its affiliates, “Mittleman”) is committed to responsibly handling nonpublic personal information regarding its clients. Through its privacy policy and procedures, Mittleman seeks to maintain the confidentiality of client records and information and protect against anticipated threats to the security and integrity of client records and information. Additional information is provided below.

FACTS	What does Mittleman Investment Management, LLC do with your personal information?	
WHY?	<p>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.</p> <p>In addition, the EU General Data Protection Regulation (“GDPR”) requires companies like Mittleman to comply with data privacy and security obligations for EU citizens such as regarding storage, integrity and confidentiality.</p>	
WHAT?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information may be collected directly from you or from your representatives and can include:</p> <ul style="list-style-type: none"> • Your name, email address, phone numbers and addresses • Social Security number • Investment experience and financial information such as with regard to your assets and income • Wire transfer instructions • Transaction history • Other personal information you or your representatives submit to Mittleman <p>In compliance with the Investment Advisers Act of 1940, we maintain all records for at least five years. When you are no longer our customer, we may continue to share your information as described in this notice unless you otherwise direct us.</p>	
HOW?	<p>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, whether Mittleman shares for each such reason, and whether you can limit this sharing.</p>	
REASONS WE CAN SHARE YOUR PERSONAL INFORMATION	Does Mittleman share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), operate and manage investment funds, or to respond to court orders and legal investigations	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	N/A. We don’t share
For our affiliates’ everyday business purposes – information about your transactions and experiences	No	N/A. We don’t share

For our affiliates' everyday business purposes – information about your account for internal research and analysis purposes	Yes	No
For our affiliates' everyday business purposes – information about your creditworthiness	No	N/A. We don't share
For non-affiliates to market to you	No	N/A. We don't share
THIRD PARTIES	Mittleman utilizes third parties related to various aspects of its business operations. We believe each of these third parties complies with Federal privacy laws and GDPR. More information about these third parties is available upon request.	
CONTACT	Questions related to this privacy notice may be directed to Stephen G. Bondi, Chief Compliance Officer, at compliance@mittlemanbrothers.com or 212-217-2340.	

WHO WE ARE	
Who is providing this notice?	Mittleman Investment Management, LLC
WHAT WE DO	
How does Mittleman 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 offices.
How does the firm collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none"> • Open an account or make an investment in one of our private funds • Give us your contact information • Give us your financial information • Enter into an investment advisory agreement or complete a subscription agreement • Make deposits, withdrawals or wire transfers to or from your account or private fund investment • Tell us about your investment or retirement portfolio • Give us your employment history
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes - information about your creditworthiness • affiliates from using your information to market to you • sharing for non-affiliates to market to you <p>GDPR, state laws, and individual companies may give you additional rights to limit sharing.</p>
DEFINITIONS	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies including Aimia Inc., our ultimate parent company, and its related entities.</p> <ul style="list-style-type: none"> ▪ <i>Our affiliates include companies that have Mittleman or Aimia as part of their name as well as Precog Capital Partners, L.P.</i>
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ▪ <i>Non-affiliates we share with can include your representative, broker or agent, or service providers or financial companies who maintain or service customer accounts for Mittleman.</i>
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.