

# FACTS

## WHAT DOES MARINER INVESTMENT GROUP, LLC DO WITH YOUR PERSONAL INFORMATION?

**Why?** Financial companies choose how they share your personal information. Federal and various state laws give consumers, investors and other clients express rights to limit the use and certain sharing of personal information. In summary Mariner is required to tell you how we collect, share, and protect your personally identifiable information (however that may be defined under applicable law) and this documents seeks to provide you with a general understanding of those rights and obligations. Please read this notice carefully to understand our practices and if you have any questions or concerns, please contact us at [dataprivacy@marinercapital.com](mailto:dataprivacy@marinercapital.com)

**What?** The types of personal information we collect and share depend on the product or service we provide to you. This information can include:

- Social Security number and assets;
- Account balances and transaction history; and
- Investment experience and wire transfer instructions.

**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 Mariner Investment Group, LLC ("Mariner") chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Mariner share?	Can you limit this sharing?
<b>For our everyday business purposes –</b> such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
<b>For our marketing purposes –</b> to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	No	No
<b>For our affiliates' everyday business purposes –</b> information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes –</b> information about your creditworthiness	No	We don't share
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For nonaffiliates to market to you</b>	No	We don't share

**To limit our sharing:**

- Call 877-857-6991 or [dataprivacy@marinercapital.com](mailto:dataprivacy@marinercapital.com).

**Please note:**  
If you are a *new* customer, we can begin sharing your information 30 days from the date we sent this notice. When you are *no longer* our customer, we may continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

**Questions?** Call 877-857-6991 or [dataprivacy@marinercapital.com](mailto:dataprivacy@marinercapital.com)

**Who we are**

**Who is providing this notice?**

Mariner Investment Group, LLC (“Mariner”), on behalf of Mariner Atlantic Multi-Strategy Fund, L.P., Mariner Atlantic Multi-Strategy Fund, Ltd. Galton Agency MBS Offshore Fund, Ltd., Galton Agency MBS Onshore Fund, L.P., Galton Mortgage Strategies Onshore Fund, L.P., Galton Mortgage Strategies Offshore Fund, Ltd., Galton Onshore Mortgage Recovery Fund III, L.P., Galton Offshore Mortgage Recovery Fund III, Ltd., Galton Onshore Mortgage Recovery Fund IV, L.P., Galton Offshore Mortgage Recovery Fund IV, Ltd., Mariner Glen Oaks Fund, L.P., Mariner Glen Oaks Offshore Fund, L.P., ; Concordia G-10 Fixed Income Relative Value I, L.P., Concordia G-10 Fixed Income Relative Value, Ltd., Concordia Institutional Multi-Strategy Ltd., Concordia Municipal Opportunities Master Fund, L.P., Mariner Frontier Fund, L.P., , Mariner Alternative Relative Value Fund I, Ltd., Galton Mortgage Basis Offshore Fund, Ltd.; Mariner GreyArc Equity Fund, L.P. and Mariner Opportunities Fund, L.P.

**What we do**

**How does Mariner protect my personal information?**

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

**How does Mariner collect my personal information?**

We collect your personal information, for example, when you:

- Give us your contact information;
- Enter into an investment advisory contract or buy securities from us or an affiliate (e.g., invest in a Mariner advised hedge fund); and
- Tell us where to send the money or make a wire transfer.

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

**Why can't I limit all sharing?**

USA 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; and
- sharing for nonaffiliates to market to you.

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

**What happens when I limit sharing for an account I hold jointly with someone else?**

Your choices will apply to everyone on your account.

## Definitions

<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Our affiliates include MIG Holdings, LLC, Mariner Group Capital Markets LLC (a limited purpose broker-dealer), Mariner Investment (Europe) LLP (an FCA registered adviser located in London) and the Back Office Services Group, LLC (an affiliated back office fund administrator for certain clients)</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>■ <i>Mariner does not share with non-affiliates so they can market to you.</i></li> </ul>
<b>Joint marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>■ <i>Mariner does not engage in joint marketing with nonaffiliated financial companies.</i></li> </ul>

## Attachment B Privacy Notice for California Residents

This Privacy Notice (“Notice”) applies solely to California residents (“consumers” or “you”) and described how Mariner Investment Group, LLC (“Mariner”, “us”, “our” or “we”) gathers, uses and shares information about you. We adopt this Notice to comply with the California Consumer Privacy Act of 2018 (CCPA) and any terms defined in the CCPA have the same meaning when used in this Notice.

Where noted in this Notice, the CCPA temporarily exempts from some of its requirements (i) employment-related personal information collected from California-based employees, job applicants, contractors, or similar individuals and used only within the context of such a relationship (“employment-related personal information”) and (ii) personal information reflecting a written or verbal business-to-business communication (“B2B personal information”).

### Information We Collect

We collect information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer, household, or device (“personal information”). Personal information does not include:

- Publicly available information which refers to information that is lawfully made available from federal, state, or local government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like:
  - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
  - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, email address, account name, Social Security number, driver’s license number, passport number, unique personal identifier, social media handles, online identifier, Internet Protocol address, or other similar identifiers.	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card	YES

	number, debit card number, or any other financial information, medical information, or health insurance information.  Some personal information included in this category may overlap with other categories.	
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
D. Commercial information.	Records of real or personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
E. Biometric information.	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as fingerprints, faceprints, and voiceprints, gait, or other physical patterns, and sleep, health, or exercise data.	NO
F. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
G. Geolocation data.	Physical location or movements.	NO
H. Sensory data.	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
I. Professional or employment-related information.	Current or past job history.	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	NO
K. Inferences drawn from other personal information.	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

We obtain the categories of personal information listed above from the following:

- Provided by you via email, telephone, at meetings or as part of any Subscription Agreement for interests in a Fund.
- Collected or generated in relation to an investment in a Fund by you or the person or the entity you represent.
- Collected or generated in relation to services provided by us to you or the person or entity you present.

- Collected or generated in relation to services provided by us by the entity you present.
- Obtained from public sources such as websites, databases, and regulatory filings.
- Collected from personal information that you manifestly choose to make public, including via social media (e.g., we may collect information from your social media profile(s), to the extent that you choose to make your profile publicly visible)

### **Use of Personal Information**

We may use or disclose the personal information we collect for one or more of the following purposes:

- To communicate with you and/or the person or entity you represent, and retain records of such communication;
- To process transactions, as necessary to meet our contractual obligations to you;
- To provide you with the services you requests. If many cases we will provide these services to comply with contractual obligations to you, but if these serves are not governed by any contract, we will use your information in this way to meet our business interests in providing the best service possible;
- To provide, support, personalize, and develop our offerings, our services or our business strategy.
- To create, maintain, customize, and secure your account with us.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To prepare investor disclosure materials. This is necessary to comply with our legal obligations, to meet our interests in managing our business effectively, and for informing you and our other investors about how we are meeting your expectations;
- To help maintain the safety, security, and integrity of the Company Services, products and services, databases and other technology assets, and business, and to protect against fraud or for risk management purposes.
- For testing, research, analysis, and product development, including to develop and improve the Company Services and our products, services, and other offerings.
- To comply with legal, regulatory or self-regulatory requirements that apply to us or our affiliates;
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.

### **Sharing Personal Information**

We may disclose your personal information to a third party for a business purpose. Such parties may include, to the extent applicable:

- The Fund's administrator; sub-administrator and/or custodians, as set forth in the Fund offering documents;
- The Fund's investment adviser, accountants, auditors, custodians, depositories, financial advisors, lawyers, tax-advisors and other outside professional advisors to the Fund;

- Public entities and institutions (e.g., regulatory, quasi-regulatory, tax, or other authorities, law enforcement agencies, courts, arbitrational bodies, fraud prevention agencies);
- To a natural or legal person, public authority, regulatory agency or body for which you have given us your consent to transfer personal data;
- To insurers; and,
- To service providers and agents appointed by us for the purposes given. These are companies in the categories of IT services, logistics, telecommunications, advice and consulting, and sales and marketing and translation services.

There may be other recipients who need your personal data due to the particular services that we provide to you.

### **Disclosures of Personal Information for a Business Purpose**

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose corresponding to the above-referenced categories:

- Category A: Identifiers.
- Category B: California Customer Records personal information categories.
- Category C: Protected classification characteristics under California or federal law.
- Category D: Commercial information.
- Category I: Professional or employment-related information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.

### **Sales of Personal Information**

Mariner does not engage in the sale of personal information as contemplated by the CCPA. As noted elsewhere in this disclosure, we share personal information with other businesses for a variety of reasons. While we often benefit from such exchanges, we do not share personal information for the sole purpose of receiving compensation for that information.

### **Your Rights and Choices**

The CCPA provides consumers (California residents) with specific rights regarding their personal information, except for employment-related personal information and B2B personal information where noted. This section describes your CCPA rights and explains how to exercise those rights, which are subject to our records retention policies and applicable law.

#### ***Access to Specific Information and Data Portability Rights***

You have the right to request that we disclose certain information to you about our collection and use of your personal information over the past 12 months. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will disclose to you:

- The categories of personal information we collected about you.
- The categories of sources for the personal information we collected about you.
- Our business or commercial purpose for collecting or selling that personal information.
- The categories of third parties with whom we share that personal information.
- The specific pieces of personal information we collected about you (also called a data portability request).
- If we sold or disclosed your personal information for a business purpose, two separate lists disclosing:
  - sales, identifying the personal information categories that each category of recipient purchased; and
  - disclosures for a business purpose, identifying the personal information categories that each category of recipient obtained.

### ***Deletion Request Rights***

You have the right to request that we delete any of your personal information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request (see Exercising Access, Data Portability, and Deletion Rights), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

We may deny your deletion request if retaining the information is necessary for us or our service provider(s) to:

1. Complete the transaction for which we collected the personal information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, or otherwise perform our contract with you.
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities.
3. Debug products to identify and repair errors that impair existing intended functionality.
4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law.
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 et. seq.).
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent.
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us.
8. Comply with a legal obligation.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

### ***Exercising Access, Data Portability, and Deletion Rights***

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at: 877-857-6991
- Emailing us at: [dataprivacy@marinercapital.com](mailto:dataprivacy@marinercapital.com)

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child. To initiate the process of designating an authorized agent, you may submit a verifiable consumer request using one of the means set forth in the Contact Information section below and specifying your request in detail sufficient to enable us to verify and complete your request.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

For instructions on exercising sale opt-out rights, see Personal Information Sales Opt-Out and Opt-In Rights.

### ***Response Timing and Format***

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### ***Personal Information Sales Opt-Out and Opt-In Rights***

We do not sell your personal information to any third parties.

If you are 16 years of age or older, you have the right to direct us to not sell your personal information at any time (the “right to opt out”). We do not sell the personal information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the “right to opt in”) from either the consumer who is at least 13 but not yet 16 years of age, or the parent or guardian of a consumer less than 13 years of age. Consumers who opt in to personal information sales may opt out of future sales at any time.

To exercise the right to opt out, you (or your authorized representative) may contact us via email or by phone as previously indicated.

Once you make an opt-out request, we will wait at least twelve (12) months before asking you to reauthorize personal information sales. However, you may change your mind and opt back in to personal information sales at any time by contacting us via email or by phone as previously indicated.

### **Non-Discrimination**

You have a right under the CCPA not to receive discriminatory treatment because you exercised any of your CCPA rights. Unless permitted by law, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### **Changes to Our Privacy Notice**

We reserve the right to amend this privacy notice at our discretion and at any time. When we make changes to this privacy notice, we will post the updated notice on Mariner’s website and update the notice’s effective date. Your continued use of the Mariner’s services following the posting of changes constitutes your acceptance of such changes.

### **Contact Information**

If you have any questions or comments about this notice, the ways in which Mariner collects and uses your information described here, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

- Phone: 877-857-6991
- Email: [dataprivacy@marinercapital.com](mailto:dataprivacy@marinercapital.com)

## **ATTACHMENT C EUROPEAN DATA PROTECTION LAWS PRIVACY & MARKETING POLICY**

### **Purpose**

This Policy is designed to ensure that Mariner Investment Group, LLC (“MIG”), Mariner Group Capital Markers, LLC (“MGCM”), Mariner Investment (Europe) LLP (MIE)<sup>1</sup>, and certain of its affiliates (hereinafter collectively referred to as “Mariner” or the “Firm”) marketing activities are compliant with applicable data protection laws in Europe as more fully described below (the “Policy”).

### **Scope**

This Policy applies to all marketing by the Firm’s officers and employees and, as appropriate, those operating on its behalf in Europe. This policy is drafted for compliance with UK and EU laws, namely the GDPR and UK PECR’s implementation of the e-Privacy Directive (defined below). It does not cover U.S. federal or state laws. As noted in the Information Security and Privacy Policy, all personal information, as defined by GDPR that is in Mariner’s possession is and will only be stored for “legitimate business purposes”.

### **Interpretation**

In this policy, we use definitions from the GDPR unless otherwise stated.

”**Anonymised data**” means information which does not relate to an identified or identifiable natural person or to personal data rendered anonymous in such a manner that the data subject is not or no longer identifiable.

”**DPIA**” means the PIA that must be carried out in certain situations, contain certain information, and over which there are other obligations, as set out in the GDPR.

”**EEA**” or ”**European Economic Area**” means the EU and Iceland, Lichtenstein and Norway.

---

<sup>1</sup> Please note that Mariner Investment (Europe) LLP (MIE) is a dually registered investment adviser. More specifically, MIE is registered with the UK Financial Conduct Authority (FCA) and the United States Securities and Exchange Commission (SEC) as a “Relying Adviser”. The investment management activity that takes place out of MIE’s London office and that necessitates registration with the SEC (currently limited to sub-advisory services provided to its affiliate Mariner Investment Group LLC (MIG) who in all cases is the direct investment manager to advised clients), is governed by Mariner’s Compliance Manual and this policy. MIE’s other regulated activities (e.g., marketing and to a lesser extent trading on behalf of MIG) that are governed by the FCA, are covered under its own compliance manual and program.

”**e-Privacy Directive**” means the EU Directive on privacy and electronic communications (Directive 2002/58/EC).

”**GDPR**” means the EU General Data Protection Regulation, 2016/679 which has effect as from 25 May 2018. As a regulation, the GDPR will take effect throughout the EU without the need for further implementation by Member States such as the UK.

”**Personal Data**” means any information relating to an identified or identifiable natural person, namely one who can be identified, directly or indirectly from that information alone or in conjunction with other information ‘in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person’<sup>2</sup>. While ”**personal data**” is a defined term in EU law, we use it here to also cover ”**personally identifiable information**” as defined in US law, and other similar legal definitions.

”**PIA**” means a privacy impact assessment, which is a written assessment of the risks to the rights and freedoms of data subjects through any processing of their personal data. A DPIA is a sub-set of PIAs.

”**Processing**” means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction’.

”**Processor**” means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

”**Pseudonymisation**” means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information [such as a lookup table relating alphanumeric identifiers to the individuals], provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person. ”**Pseudonymised data**” means personal data that has been pseudonymised.

”**Special Categories of Personal Data**” means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation.

”**Transfers**” means the transfer of personal data either to ”**third countries**” meaning countries outside the EU or ”**international organisations**” meaning an organisation and its

---

<sup>2</sup> Examples of personal data are from the EU General Data Protection Regulation (‘GDPR’).

subordinate bodies governed by public international law, or any other body which is set up by, or on the basis of, an agreement between two or more countries.

“**UK PECR**” means the UK Privacy and Electronic Communications (EC Directive) Regulations 2003 as amended.

## **The Policy**

All marketing activities by or on behalf of the Firm must comply with applicable data privacy laws (and other applicable laws).

### *Privacy by Design, Privacy by Default*

Marketing activities must incorporate privacy by design and privacy by default principles – including the principles of data minimization, accuracy, storage limitation and integrity and confidentiality. In particular, PIAs (including DPIAs) must be carried out regarding proposed marketing activities as appropriate and in accordance with our PIA & DPIA Policy and related procedure.

### *Data Subject Rights*

The Firm’s Data Subject Rights Policy and related procedure sets out how the Firm will respond when data subjects exercise their rights under the GDPR, including regarding marketing. The Data Protection Policy and the Consent Procedure set out how the Firm will comply with consent requirements.

### *Pseudonymisation & Anonymisation*

Where appropriate, and the Firm recognises this will not be in all cases, we will give due consideration to pseudonymising or anonymising personal data used in marketing activities.

### *National and the Firm’s Do Not Contact Registers*

The UK’s data privacy laws establish national do-not-contact registers for telephone calls (the Telephone Preference Service (“TPS”) and the Corporate Telephone Service (“CTPS”)) and fax (the Fax Preference Service (“FPS”)). If a person registers their phone number (including a work phone number) on the TPS, CTPS or FPS, it is illegal to phone or send a fax to that number. In addition, in order to comply with its obligations under DP Law, the Firm shall maintain a Do Not Contact register recording all marketing opt-outs, including by individuals at their business contact details.

Contact details used in marketing activities must be cleansed as required by applicable data privacy laws against the relevant national preference services such as the UK’s TPS, CTPS and FPS and The Firm’s Do Not Contact register.

### *Automated calls & faxes*

The Firm's policy is that we will not make automated marketing calls nor send marketing faxes.

### *Children*

The Firm's policy is that we will not market to any person under the age of 18, nor will we process any personal data relating to a person under the age of 18 in the course of or in relation to our marketing activities.

### *Special Categories of Personal Data*

The Firm's policy is that we will not process any Special Category of Personal Data in the course of or in relation to our marketing activities.

### *Personal Data related to Criminal Convictions and Offences*

The Firm's policy is that we will not process any personal data related to criminal convictions and offences in the course of or in relation to our marketing activities.

### *Processors & Transfers*

It is highly likely that a supplier of services to the Firm for our marketing activities will process personal data and therefore be a "processor". No supplier for marketing activities may be used unless they have passed the Processor (Vendor) due diligence set out in the Processor (Vendor) Policy and related procedure. Personal data should not be transferred outside of the EEA unless in accordance with our Personal Data Transfer Policy.

### *Approved Codes of Conduct & Certifications*

The GDPR allows for approval of codes of conduct (Article 40) and certification mechanisms (Article 42). Adherence to an approved code or certification mechanism may be used as an element by which to demonstrate compliance with various requirements in the GDPR. If necessary or appropriate, The Firm will review such codes and certification mechanisms for relevance and fit for our marketing operations.

## **Unsubscribe**

Should you want to unsubscribe from any marketing communication please contact [unsubscribe@marinercapital.com](mailto:unsubscribe@marinercapital.com). Should you want to have the personal details that we hold for you, deleted, please contact [dataprivacy@marinercapital.com](mailto:dataprivacy@marinercapital.com). The Firm will endeavor to process this within 24 hours.

## **Breach**

If you become aware of a breach of this policy, you must report it promptly to the Firm's Compliance Department at [marinercompliance@marinercapital.com](mailto:marinercompliance@marinercapital.com).

### **Enforcement**

All of the Firm's employees bear responsibility for their own compliance with this policy. Breach of this policy is ground for disciplinary proceedings against an employee, which may result in disciplinary action including termination of employment. Breach of this policy by any non-employee such as a temporary worker, contractor or supplier may be a breach of their contract with the Firm and grounds for damages or termination.

### **Ownership**

MIG's Chief Compliance Officer (assisted as necessary by other members of Mariner's Compliance Team) is responsible for maintaining this policy, related training and awareness programs.

### **Recordkeeping**

All reports and records required to be kept in accordance with these procedures and the Investment Advisors Act of 1940 will be retained for a period of 5 years in an easily accessible location, the first two years of which shall be in an appropriate office of the investment adviser.

### **Revisions to Policy and Procedures**

This policy and related procedures may be changed or revised as frequently as necessary in order to accommodate any changes in Mariner's operations or by operation of law. Any such change, amendment or revision may only be made by Mariner's Legal and Compliance Group and when consistent with applicable law. Any material changes will be promptly distributed to all impacted employees.

**ATTACHMENT D**  
**CAYMAN ISLANDS DATA PROTECTION LAW**  
**PRIVACY & MARKETING POLICY**

**YOU HAVE RECEIVED A COPY OF THIS NOTICE BECAUSE YOU HOLD AN INTEREST IN A CAYMAN ISLANDS-DOMICILED LIMITED PARTNERSHIP COMPANY (EACH, A “FUND”). THE FOLLOWING NOTICE APPLIES TO YOUR INVESTMENT(S) IN SUCH ALTERNATIVE INVESTMENT FUND(S).**

---

**Fund Privacy Notice**

**Introduction**

The purpose of this notice is to provide you with the information on our use of your personal data in accordance with the Cayman Islands Data Protection Law, 2017 (the “DPL”). The DPL, effective September 30, 2019, is applicable to individual persons associated with any Cayman Island-domiciled fund offered by Mariner Investment Group, LLC (“Mariner”)<sup>3</sup>. The DPL is based on a set of internationally recognized privacy principles, and provides a framework of rights and duties designed to give individuals greater control over their personal data. This does not change the manner in which we use or intend to use your personal data. Mariner recognizes the importance of safeguarding personal data and the trust clients and investors place in Mariner in allowing us to access this data

In this document, “we”, “us”, and “our” refers to the Fund, the General Partner or Directors of each Fund, and the administrator and/or investment adviser (as applicable) and their affiliates and/or authorized delegates.

**Investor Data**

By virtue of making an investment in the Fund and your associated interactions with us (including any capital commitment and/or capital contribution (whether past, present or future) and the recording of electronic communications where applicable) or by virtue of you otherwise providing us with personal information of individuals connected with you as an investor (for

---

<sup>3</sup> Cayman Island-domiciled funds offered by MIG as of March 2022 are Concordia G-10 Fixed Income Relative Value Fund I LP; Concordia G-10 Fixed Income Relative Value, Ltd; Concordia G-10 Fixed income Relative Value Fund L.P.; Concordia Municipal Opportunities Master Fund L.P.; Concordia Institutional Multi-Strategy Ltd.; Galton Agency MBS Master Fund, LP; Galton Agency MBS Offshore Fund, Ltd.; Galton Agency MBS Onshore Fund, L.P.; Galton Mortgage Recovery Master Fund III, LP.; Galton Offshore Mortgage Recovery Fund III, Ltd; Galton Mortgage Recovery Master Fund IV, LP; Galton Offshore Mortgage Recovery Fund IV, Ltd; Galton Mortgage Recovery Fund IV, L.P.; Galton Mortgage Strategies Master Fund, L.P.; Galton Mortgage Strategies Offshore Fund, Ltd.; Galton Mortgage Strategies Onshore Fund, L.P.; Mariner Alternative Relative Value Master Fund, LP; Mariner Alternative Relative Value Fund I, Ltd.; Mariner Glen Oaks Master Fund, LP; Mariner Glen Oaks Offshore Fund, L.P.; Mariner Glen Oaks Fund, L.P.; Mariner Atlantic Multi-Strategy Master Fund, Ltd. (formerly Mariner LDC); Mariner Atlantic Intermediate, Ltd.; Galton Mortgage Basis Master Fund, L.P.; Galton Mortgage Basis Offshore Fund, Ltd.;

example directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners or agents), you will provide us with certain “personal information” that constitutes personal data within the meaning of the DPL (collectively “Investor Data”). We may also obtain Investor Data from other public sources. Investor Data includes, without limitation, the following information relating to you and/or any individuals connected with you as an investor: name; residential address; email address; contact details (including private and/or business phone numbers, postal and email addresses); corporate contact information; signature; nationality; place of birth; date of birth; gender; marital status; name of spouse; number of children (if applicable); tax identification or status; credit history; correspondence records; authentication data such as sample signatures; identification such as passport, drivers license, social security number, ID card or other state or national identification documents which may contain a photograph; bank account details, source of funds details; details relating to your investment activity; data related to designation of your status as a politically exposed person (PEP) and related information, marketing and sales data (e.g., customer relationship documentation); dietary and access requirements (e.g., for event organization purposes); and other data similar to the broad categories mentioned above.

In our use of Investor Data, we will be characterized as a “data controller” for the purposes of the DPL. The Fund’s and the General Partner’s/Directors’ affiliates and delegates may act as “data processors” for the purposes of the DPL.

### **Who this Affects**

If you are a natural person, this will affect you directly. If you are a corporate investor (including, for these purposes, legal arrangements such as trusts or exempted limited partnerships) that provides us with Investor Data on individuals connected to you for any reason in relation to your investment with us, this will be relevant for those individuals and you should transmit this document to such individuals or otherwise advise them of its content.

### **How We May Use Your Personal Data**

We, as the data controller, may collect, store and use Investor Data for lawful purposes, including, in particular:

- (i) Where this is necessary for the performance of our rights and obligations under the Subscription Agreement and/or the constitutional and operational documents of a Fund or the General Partner/Directors;
- (ii) Where this is necessary for compliance with a legal and regulatory obligation to which Mariner, a Fund, the General Partner/Directors or Mariner and its affiliates maybe subject (such as compliance with anti-money laundering and FATCA/CRS requirements); and/or
- (iii) Where this is necessary for the purposes of our legitimate interests and such interests are not overridden by your interests, fundamental rights or freedoms.

Our service providers, including a fund administrator, may use Investor Data, for example to provide its services to the Fund and the General Partner/Directors or to discharge the legal or regulatory requirements that apply directly to it or in respect of which a Fund and the General Partner/Directors of a Fund may rely upon the Administrator, but such use of Investor Data by the Administrator or other service provider will always be compatible with at least one of the aforementioned purposes for which we process Investor Data.

Should we wish to use Investor Data for other specific purposes (including, if applicable, any purpose that requires your consent), we will contact you.

### **Why We May Transfer Your Personal Data**

In certain circumstances we and/or our authorised affiliates or delegates may be legally obliged to share Investor Data and other information with respect to your interest in a Fund with the relevant regulatory authorities such as the Cayman Islands Monetary Authority or the Tax Information Authority. They, in turn, may exchange this information with foreign authorities, including tax authorities.

We anticipate disclosing Investor Data to parties who provide services to Funds advised by Mariner and their respective affiliates (which may include certain entities located outside the Cayman Islands or the European Economic Area), who will process your personal data on our behalf. Such parties may include, to the extent applicable:

- (i) A Fund's administrator, sub-administrator and/or custodians, as set forth in the Fund offering documents;
- (ii) A Fund's investment adviser, accountants, auditors, custodians, depositories, financial advisors, lawyers, tax advisors and other outside professional advisors to the Fund;
- (iii) Public entities and institutions (e.g., regulatory, quasi-regulatory, tax or other authorities, law enforcement agencies, courts, arbitral bodies, fraud prevention agencies);
- (iv) To a natural or legal person, public authority, regulatory agency or body for which you have given us your consent to transfer personal data;
- (v) To insurers; and,
- (vi) To service providers and agents appointed by us for the purposes given. These are companies in the categories of IT services, logistics, telecommunications, advice and consulting, and sales and marketing and translation services.

There may be other recipients who need your personal data due to the particular services that we provide to you.

### **Transferring Data**

In certain circumstances, we may transfer your personal data to another country, which may be outside the United States, the Cayman Islands, or a country deemed by the Cayman Islands Privacy Commissions as providing adequate privacy protection such as, for example, the

European Union, Member States of the European Economic Area and other countries with data protection regulation deemed equivalent by the European Commission.

We may also need to transfer your personal data to a country that may not afford the same level of privacy protection as the Cayman Islands (“third countries”). You understand that the data protection legislation in these third countries may not give you as much protection as the data protection legislation within the Cayman Islands. For transfers to third countries, we will transfer the personal data in accordance with the Cayman Island cross border requirements such as relying on a derogation applicable to the specific situation or implement data transfer contractual provisions meeting the standard imposed under the DPL in an effort to ensure the protection of your personal data. Reasons for having to possibly transfer your data outside the Cayman Island may include - a need to carry out our contract with you, we have to fulfill a legal and/or compliance obligation; we need to protect the public interest; and/or for your or our legitimate interests.

### **Retention of Personal Data**

We will retain your personal data for as long as is necessary for the purposes set out herein, or for as long as is required by applicable laws and/or regulations.

### **Data Privacy Rights**

Depending on the jurisdiction, individuals may have the following rights with respect to their personal data:

- The right to access information we hold about you and to obtain information about how we process it;
- The right to request that we rectify information we hold about you if it is inaccurate or incomplete;
- The right to object to and withdraw your consent to the processing of your information.
- This right can be exercised at any time. However, we may continue to process your personal information if there is another legitimate reason or legal obligation for doing so.
- Please also note that depending on which kind of processing you object to, we may no longer be able to perform financial services for you.
- In some circumstances, you have the right to receive certain information you have provided to us in an electronic format and/or request that we transmit it to a third party;
- In some circumstances, you have the right to request the erasure and deletion of personal data we hold. We may; however, continue to retain it if we are entitled or required by law to do so;
- The right to object to, and to request that we restrict, our processing of your information in some circumstances. Please note that despite this general right we may be entitled under law to continue processing the information and/or to refuse that request.

To exercise any of the above rights, you should write to [dataprivacy@marinercapital.com](mailto:dataprivacy@marinercapital.com). We will then assess and respond to your request to exercise your rights.

You also have a right to make a complaint to the Cayman Islands Ombudsman:

Cayman Islands Ombudsman  
PB Box 2252,  
Grand Cayman, Cayman Islands  
KY1-1107  
Email: [info@ombudsman.ky](mailto:info@ombudsman.ky)  
Phone: 1(345)946 6283

### **Automated Decision Making**

In establishing and carrying out a business relationship, we do not use any fully automated decision-making. If this should change, we will inform you separately,

### **Effective Date**

This privacy statement took effect on September 30, 2019. We may need to make changes to it in the future. We will post updates to this privacy statement on our website.