



Investor Privacy Notice

Lyrical Asset Management LP (together with its affiliates, “Lyrical”) is committed to handling responsibly nonpublic personal information regarding its clients. Through its privacy policy and procedures, Lyrical 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.

QUESTIONS	FACTS																					
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 Lyrical 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 • Wire transfer instructions and account transaction history • Other personal information you or your representatives submit to Lyrical <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. We list below reasons financial companies can share their customers’ personal information, whether Lyrical shares for each such reason, and whether you can limit this sharing.</p>																					
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Reasons for sharing personal information</th> <th style="text-align: left;">Does Lyrical share?</th> <th style="text-align: left;">Can you limit this sharing?</th> </tr> </thead> <tbody> <tr> <td>For our everyday business purposes – such as to process your transactions and maintain your account(s)</td> <td>Yes</td> <td>No</td> </tr> <tr> <td>For our marketing purposes – to offer our products and services to you</td> <td>Yes</td> <td>Yes</td> </tr> <tr> <td>For joint marketing with other financial companies</td> <td>No</td> <td>N/A. We do not share</td> </tr> <tr> <td>For our affiliates’ everyday business purposes – information about your transactions and experiences</td> <td>Yes</td> <td>No</td> </tr> <tr> <td>For our affiliates’ everyday business purposes – information about your creditworthiness</td> <td>No</td> <td>N/A. We do not share</td> </tr> <tr> <td>For nonaffiliates to market to you</td> <td>No</td> <td>N/A. We do not share</td> </tr> </tbody> </table>		Reasons for sharing personal information	Does Lyrical share?	Can you limit this sharing?	For our everyday business purposes – such as to process your transactions and maintain your account(s)	Yes	No	For our marketing purposes – to offer our products and services to you	Yes	Yes	For joint marketing with other financial companies	No	N/A. We do not 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	N/A. We do not share	For nonaffiliates to market to you	No	N/A. We do not share
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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 information about your creditworthiness, for affiliates’ everyday business purposes • sharing with affiliates so they can market to you • sharing for nonaffiliates to market to you <p>GDPR and state laws may give you additional rights to limit sharing.</p>																					

How does Lyrical 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.
Third Parties	Lyrical engages third parties related to certain 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 Jeffrey Moses, Chief Operating Officer, at jmoses@lyricalpartners.com or 212-415-6640.