**Valoran Group LLC - Privacy Notice**

**FACTS**

What does Valoran Group do with your personal information?

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| 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 your relationship with us as an investor in a private investment fund. This information may include:<br>• Social Security number, tax identification number, and government identification<br>• Subscription documents and capital commitment information<br>• Account balances, capital contributions, and distribution history<br>• Investment experience, financial condition, and risk tolerance<br>• AML/KYC documentation and related verification materials |
| 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 Valoran Group chooses to share; and whether you can limit this sharing. |

**Reasons We Can Share Your Personal Information**

| Reasons we can share your personal information | Does Valoran share? | Can you limit this sharing? |
|---|---|---|
| For our everyday business purposes – such as to process your transactions, maintain your investment(s), respond to court orders and legal investigations. | Yes | No |
| For our marketing purposes – to offer our products and services to you | No | We don't share |

| | | |
|---|---|---|
| For joint marketing with other financial companies | No | We don't share |
| For our affiliates' everyday business purposes – information about your transactions and experiences | No | We don't share |
| For our affiliates' everyday business purposes – information about your creditworthiness | No | We don't share |
| For nonaffiliates to market to you | No | We don't share |

**Who We Are**

Who is providing this notice?
Valoran Group LLC

**What We Do**

How does Valoran protect my personal information?
To protect your personal information from unauthorized access and use, we maintain administrative, technical, and physical safeguards consistent with federal standards. These safeguards include encryption, access controls, vendor oversight procedures, secure network infrastructure, and incident response protocols designed to protect sensitive information.

We may share your information with service providers that perform services on our behalf, such as fund administrators, auditors, legal counsel, custodians, and regulatory authorities. These providers are contractually obligated to maintain the confidentiality and security of your information.

How does Valoran collect my personal information?
We collect your personal information, for example, when you:
- Open an account or enter into an investment transaction
- Provide account or contact information

**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

We do not share in a manner that would give rise to these rights. Therefore, no opt-out is provided, as it is not applicable.

**Definitions**

Affiliates
Companies related by common ownership or control. They can be financial and non-financial companies. Valoran has affiliated entities that provide additional services but does not share your information with those entities for marketing or credit-related purposes.

Nonaffiliates
Companies not related by common ownership or control. They can be financial and non-financial companies. We do not share with nonaffiliates for marketing purposes.

Joint Marketing
A formal agreement between nonaffiliated financial companies that together market financial products or services to you. We do not participate in joint marketing.

**Additional State Privacy Rights**

If you are a resident of California, Vermont, or Nevada, you may have additional rights under applicable state laws.

**California:** We do not sell your personal information. If the California Consumer Privacy Act applies to our relationship, we will provide you with a separate notice describing your rights.
**Vermont:** We do not disclose your nonpublic personal financial information to nonaffiliated third parties unless authorized by you.
**Nevada:** We do not sell your personal information. Nevada residents may contact us at investors@valorancapitalmanagement.com to inquire about your rights under Nevada law.

**Policy Updates**

We may revise this notice periodically. If we make material changes to our privacy practices, we will notify you as required by law.

**Questions?**

Call us at (312) 391-0112.