



Privacy Policy July 2022

RiverRock is committed to protecting your privacy and maintaining the security of your nonpublic personal information. This Privacy Policy explains the manner in which RiverRock collects, utilizes and maintains nonpublic personal information about its Investors (as defined below), as required by federal laws, rules and regulations. “RiverRock” refers to each investment program, partnership, limited liability company or private fund (collectively, the “Fund” or “Funds”) for which RiverRock or any affiliate serves as general partner, managing member, trading member, portfolio manager or investment manager. As noted above, this Privacy Policy only applies to products and services provided by RiverRock to individuals regarding investments in the Fund and which are used for personal, family, or household purposes and not business purposes (collectively, the “Investors”).

Collection of Investor Information

RiverRock collects personal information about its Investors from the following sources: Offering memorandums, subscription forms, investor questionnaires, account forms and other information provided by Investors in writing, in person, by telephone, electronically or by any other means.

The type of nonpublic personal information that RiverRock may collect from the foregoing sources includes, among others, name, address, social security number or tax identification number, employment information, financial and/or income information, beneficiary contact details and investment qualifications.

Disclosure of Nonpublic Personal Information

RiverRock may share nonpublic personal information about its Investors or potential Investors with affiliates as permitted by law. RiverRock does not disclose nonpublic personal information about its Investors or potential Investors to nonaffiliated third parties, except as permitted by law (for example, to service providers who provide services to the Investor, the Investor’s account or the Fund).

RiverRock may share nonpublic personal information with its affiliates without an Investor’s consent. In addition, RiverRock may share nonpublic personal information with unaffiliated parties in the following situations, among others:

- to comply with federal, state or local laws, rules and other applicable legal requirements;
- to comply with a properly authorized civil, criminal or regulatory investigation or subpoena or summons by federal, state or local authorities;
- in connection with a proposed or actual sale, merger, or transfer of all or a portion of the business or the Fund in which you are invested;
- to protect against or prevent actual or potential fraud, unauthorized transactions (such as money laundering), claims or other liabilities;

- for the purpose of compliance with anti-money laundering laws and anti-terrorist due diligence or federally mandated reporting requirements;
- to service providers of the Fund in which you are invested in connection with the administration and operations of the Fund, which may include brokers, attorneys, accountants, auditors, administrators or other professionals;
- to process or complete transactions requested by an Investor; and
- upon consent of an Investor to release such information, including authorization to disclose such information to persons acting in a fiduciary or representative capacity on behalf of the Investor.

To further your personal right to privacy you have the additional rights:

- The right to know what personal information is being collected about you;
- The right to know whether your personal information is sold or disclosed and to whom;
- The right to stop the sale of personal information;
- The right to have collected personal information deleted; and
- The right not to be discriminated against for exercising your rights.

To the extent permitted by law, you have the right to opt-out of our disclosing nonpublic personal information to nonaffiliated third parties by contacting us at compliance@riverrockfunds.com and/or 713-375-1300 (as we do not have a tollfree number we will accept collect calls). We will without charge comply with your request within 45 days or sooner and not later than 90 days when due to the complexity of the request.

Former Customers and Investors: This same Privacy Policy applies to former Investors.

Protection of Investor Information: RiverRock maintains physical, electronic and procedural safeguards that comply with applicable federal and state standards to protect customer information. RiverRock restricts access to the personal and account information of Investors to those advisory persons who need to know that information in the course of their job responsibilities. RiverRock will destroy, erase or make unreadable data, computer files and documents containing nonpublic personal information prior to disposal. When disposing of paper records containing confidential Investor information our staff is trained to use an electronic shredder or destruction locked box.

Further Information: RiverRock reserves the right to change this privacy policy at any time. The examples contained within this policy are illustrations and are not intended to be exclusive. This policy complies with federal law regarding privacy issues. You may have additional rights under other foreign or domestic laws that may apply to you. If you have any questions about this privacy policy, please call us at 713-375-1300.

Our Form ADV Part 2A:

A complimentary copy of the firm's Form ADV Part 2A is available to you upon written request. Please send your inquiry to RiverRock 500 West 2nd Street, Suite 1575, Austin, TX 78701.