

Privacy Policy

Last Updated: April 29, 2026

This Privacy Policy describes the privacy practices of HighBrook Investment Management LP (“we”, “us”, “our” or “HighBrook Investors”) and how we handle personal information that we collect through our website <https://www.highbrookinvestors.com> (collectively, the “Service” or “Services”).

This Privacy Policy does not cover our processing of your personal information in connection with your investor account or investment with us, our investor portal or the operation of our funds. If you are an investor, you should review the privacy notices within your subscription documents for more information.

1. Personal Information We Collect

Information you provide to us, including through forms and questionnaires, your use of our website, and through our communications with you.

- **Contact and identification details**, such as your first and last name, profession, company name, email address, mobile phone number and any other contact data that you may provide when you contact us through the website, via email, LinkedIn or otherwise.
- **Investor login**, such as your email/user ID and password when you log into the investor portal. Please note, however, this Privacy Policy does not cover our processing of your personal information in connection with your investment with us.
- **Communications** that we exchange with you, including when you contact us with questions, feedback, or otherwise.
- **Usage information**, such as information about how you use the Services and interact with us.
- **Other data** not specifically listed here, which we will use as described in this Privacy Policy or as otherwise disclosed at the time of collection.

Information we obtain from third parties.

- **Social media.** We may maintain pages on social media platforms, such as LinkedIn. When you visit or interact with our pages on those platforms, the platform provider’s privacy policy will apply to your interactions and their collection, use and processing of your personal information. You or the platforms may provide us with information through the platform, and we will treat such information in accordance with this Privacy Policy.
- **Other sources.** We may obtain your personal information from other third parties, such as publicly-available sources and data providers, for example for recruitment.

Automatic data collection. We and our service providers may automatically log information about you, your computer or mobile device, and your interaction over time with the Services, our communications and other online services, such as:

- **Device data**, such as your computer's or mobile device's operating system type and version, manufacturer and model, browser type, screen resolution, device type (e.g., phone, tablet), IP address, radio/network information (e.g., WiFi, LTE, 3G), and general location information such as city, state, or geographic area.
- **Online activity data**, such as pages or screens you viewed, how long you spent on a page or screen, the website you visited before browsing to the Website, navigation paths between pages or screens, information about your activity on a page or screen, access times, and duration of access.

For more information, please see our [Cookie Policy](#).

2. How We Use Personal Information

We use your personal information for the following purposes:

- **Provision of the Services.** It is in our legitimate interest to operate and allow you to use our Services. In particular, we provide, operate, maintain, secure, and improve our Services and respond to your requests, questions, and feedback.
- **Research and development.** We process personal information in our legitimate interests to carry out research and development. As part of these activities, we may create aggregated, de-identified or other anonymous data from personal information we collect. We may use this anonymous data and share it with third parties for our lawful business purposes, including to analyze and improve the Services, and promote our business.
- **Job applications.** We use the personal information you provide to us in the context of a job application to process your application and to assess your suitability for a job with us.
- **Compliance and protection**, including:
 - To comply with applicable laws, lawful requests, and legal process, such as to respond to requests from government authorities.
 - In our legitimate interests to protect our, your or others' rights, privacy, safety, or property (including by making and defending legal claims).
 - Auditing our internal processes for compliance with legal and contractual requirements and internal policies. Where we do not have a legal obligation, we do so in our legitimate interests.
 - Enforce the terms and conditions that govern our Services.
 - In our legitimate interests to prevent, identify, investigate and deter fraudulent, harmful, unauthorized, unethical or illegal activity, including cyberattacks and identity theft.

3. How We Share Personal Information

We do not sell personal information. We may share your personal information with:

- **Affiliates.** Our subsidiaries, and affiliates, for purposes consistent with this Privacy Policy.
- **Service providers.** Companies and individuals that provide services on our behalf or help us operate the Services or our business (such as hosting, information technology, customer support, email delivery, and website analytics services).
- **Professional advisors.** Professional advisors, such as lawyers, auditors, bankers, and insurers, where necessary in the course of the professional services that they render to us.
- **Authorities and others.** Law enforcement, government authorities, and private parties, as we believe in good faith to be necessary or appropriate for the compliance and protection purposes described above.
- **Business transferees.** Acquirers and other relevant participants in business transactions (or negotiations for such transactions) involving a corporate divestiture, merger, consolidation, acquisition, reorganization, sale, or other disposition of all or any portion of the business or assets of, or equity interests in HighBrook (including, in connection with a bankruptcy or similar proceedings).

4. Your Rights and Choices

Personal information requests. Depending on your location and the nature of your interactions with our Services, you may request the following in relation to your personal information:

- **Information** about how we have collected and used your personal information. We have made this information available to you without having to request it by including it in this Privacy Policy.
- **Access** to a copy of the personal information that we have collected about you. Where applicable, we will provide the information in a portable, machine-readable, readily-usable format.
- **Correction** of personal information that is inaccurate or out of date.
- **Deletion** of personal information that we no longer need to provide the Services or for other lawful purposes.
- **Opt-out** of “selling” your personal information or “sharing” of personal information for our advertising purposes. By default, we do not “sell” your personal information or “share” your personal information for our advertising purposes, and we do not have actual knowledge that we have sold or shared the personal information of children under the age of 16.
- **Additional rights**, such as to **object** to and request that we **restrict** our use of personal information.

To exercise the above rights, contact us as set out in the “How to contact us” Section below. Prior to responding to your requests, we may verify your identity by matching any requested identifying information you provide against the information we have about you.

In some instances, your rights and choices may be limited, such as where fulfilling your request would impair: the rights of others, our ability to provide a service you have requested, or our ability to comply with our legal obligations and enforce our legal rights.

Right to complain. Depending on where you reside, such as if you reside in the European Economic Area (EEA) or United Kingdom (UK), you may have the right to complain to a data protection regulator where you live or work, or where you feel a violation has occurred. Click [here](#) to find your local supervisory authority in the EEA. In the UK, the competent authority is the Information Commissioner's Office.

5. Other Sites and Services

Our Services may contain links to websites and other online services operated by third parties. In addition, our content may be integrated into web pages or other online services that are not associated with us. These links and integrations are not an endorsement of, or representation that we are affiliated with, any third party. We do not control websites or online services operated by third parties, and we are not responsible for their actions.

6. Retention

Where required under applicable laws, we retain personal information only for as long as is necessary to fulfil the purposes for which it was collected and processed, in accordance with our retention policies, and in accordance with applicable laws and regulatory obligations or until you withdraw your consent (where applicable). To determine the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal information, the potential risk of harm from unauthorized use or disclosure of personal information, the purposes for which we use personal information and whether we can achieve those purposes through other means, and the applicable legal and regulatory requirements.

7. Data Security

We employ a number of technical, organizational, and physical safeguards designed to protect the personal information we collect. However, no security measures are failsafe and we cannot guarantee the security of your personal information.

8. International Data Transfers

You will provide personal information directly to us in the United States. We may also transfer personal information to our affiliates and service providers in the United States and other jurisdictions. Please note that such jurisdictions may not provide the same protections as the data protection laws in your home country.

When we engage in cross-border data transfers, we will ensure that relevant safeguards are in place to afford adequate protection for personal information and we will comply with applicable data protection laws, in particular by relying on an EU Commission or UK government adequacy decision or on contractual protections for the transfer of personal information. For more information about how we transfer personal information internationally, please contact us as set out in the "How to Contact Us" section below.

9. Job Applicants

When you apply for one of our open positions, we collect the information that you provide in connection with your job application. This includes but is not limited to business and personal contact information, professional credentials and skills, educational and work history, and other information that may be included in a resume or that you may provide during the interview process. This may also include demographic or diversity information that you voluntarily provide. We may also conduct background checks and receive related information. We also collect personal information from other sources where relevant for your application, such as employment research firms, recruiters, identity verification services, and information that you make publicly available on websites or social media platforms (for example, LinkedIn).

Throughout the recruitment process, we may supplement your personal information in connection with the assessment of your application. For example, we may record the views of those considering your application about your suitability for the role for which you have applied and retain interview notes. If you accept an offer from us, your personal information will be incorporated into and used as part of your employee record.

We use applicants' information to facilitate our recruitment activities, process employment applications and personalize candidate communication, including evaluating candidates and monitoring recruitment statistics. We also use successful applicants' information to administer the employment relationship. We may also use and disclose applicants' information to improve our Services and for the compliance and protection purposes described above.

10. Children

The Services is not intended for use by children under 18 years of age. If we learn that we have collected personal information through the Services from a child under 18 without the consent of the child's parent or guardian as required by law, we will delete it.

11. Changes to this Privacy Policy

We reserve the right to modify this Privacy Policy at any time. If we make material changes to this Privacy Policy, we will notify you by updating the date of this Privacy Policy and posting it on the website.

12. How to Contact Us

Responsible entity. HighBrook Investment Management LP is the entity responsible for the processing of personal information under this Privacy Policy (as a controller, where provided under applicable law).

Contact us. If you have any questions or comments about this Privacy Policy, our privacy practices, or if you would like to exercise your rights with respect to your personal information, please contact us by email at: Info@highbrookinvestors.com.