

## Privacy Policy

<b>FACTS</b>	<b>WHAT DOES IRIDIAN ASSET MANAGEMENT LLC and IAM CAPITAL CORPORATION (together “IRIDIAN”) DO WITH YOUR PERSONAL INFORMATION?</b>
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?	<p>The types of personal information we collect and share depend on the product or service you have with us. The information can include:</p> <ul style="list-style-type: none"> <li>▪ Social Security number</li> <li>▪ Your assets and income</li> <li>▪ Your investment experience and your employment information</li> <li>▪ Wire transfer instructions</li> </ul> <p>When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p>
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 Iridian chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Iridian 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	We don’t share
<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 nonaffiliates to market to you</b>	No	We don’t share

Questions?	Call Iridian at (203) 341-7800
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Who we are	
Who is providing this notice?	<i>Iridian Asset Management LLC IAM Capital Corporation</i>
What we do	
How does Iridian 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 buildings.
How does Iridian collect my personal information?	We collect your personal information, for example, when you <ul style="list-style-type: none"> <li>▪ Enter into an investment advisory agreement</li> <li>▪ Subscribe for an interest in a private investment vehicle sponsored by Iridian</li> <li>▪ Give us your asset and income information</li> <li>▪ Provide account information or your contact information</li> <li>▪ Show your driver's license or your government-issued ID</li> </ul>
Why can't I limit sharing?	Federal law gives you the right to limit only <ul style="list-style-type: none"> <li>▪ Sharing for affiliates' everyday business purposes – information about your creditworthiness</li> <li>▪ Affiliates from using your information to market to you</li> <li>▪ Sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>▪ <i>Our affiliates include companies with an Iridian name and those without an Iridian name that sponsor private investment vehicles advised by Iridian.</i></li> </ul>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> <li>▪ <i>Iridian does not share with nonaffiliates so that they can market to you.</i></li> </ul>
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> <li>▪ <i>Iridian does not jointly market.</i></li> </ul>
Other important information	
<b>California:</b> Except as permitted by law, we will not share personal information we collect about California residents with nonaffiliates and we will limit sharing such personal information with our affiliates to comply with California privacy laws that apply to us.	