

# **CoreCommodity Management, LLC**

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## **Privacy Policy**

**March 2016**

## **Privacy Policies**

CoreCommodity Management, LLC (“CoreCommodity” or “We” or “Us”) understands that our relationship with our clients and investors is based on trust. The following disclosure explains what personal information we collect, what we do with that information and the steps we have put in place to protect the nonpublic personal information that our clients and investors have entrusted to us.

## **Regulation S-P**

SEC Regulation S-P sets forth privacy requirements for the use of non-public personal financial information by SEC-registered investment advisers. Under this regulation, we are required to provide notice to clients and investors about our privacy policies and practices, under what conditions we may disclose non-public personal information to an unrelated third party, and to provide a method for a client or investor to opt out of sharing non-public personal information with unrelated third parties. Regulation S-P applies only to our clients and investors who are natural persons.

## **What is Non-Public Personal Information?**

Non-public personal information means: (i) “personally identifiable information”; and (ii) any list, description, or other grouping of consumers (and publicly available information pertaining to them) that is derived using any personally identifiable financial information that is not publicly available information. “Personally identifiable information” in turn, means any information: (i) a client or investor provides to us to obtain a financial product or service from us; (ii) about a client or investor resulting from any transaction involving a financial product or service between us and such client or investor.

## **Information We Collect**

From time to time, we gain access to client and investors’ personal information through:

- Our interactions on the telephone, in person or through e-mail
- Subscription documents or other forms completed by clients and investors or information provided by clients and investors
- Transactions in their accounts or on their behalf
- Our website or the websites of our affiliated companies
- Trading tools or other information tools we may make available to clients and investors
- Third parties with whom we deal, such as consumer-reporting agencies, to verify information we receive and to determine credit worthiness

## **Information We Disclose**

Subject to legal, tax, regulatory or other governmental requirements, it is our policy not to disclose any of an investor’s nonpublic personal information to unrelated third parties without the investors’ consent, unless those parties are providing services or support to CoreCommodity or the applicable private investment vehicle or client and have agreed to keep the investor’s nonpublic personal

information confidential. Examples of these parties include, but are not limited to, a third-party administrator, attorneys and accountants and/or affiliates thereof. Even if the investor or client ceases to transact business with CoreCommodity, we will continue to apply the same protections to the investor's or client's nonpublic personal information as we did when the investor or client was active.

### **Protecting Investors' Information**

We protect the investors' nonpublic information from access by third parties by maintaining physical, electronic and procedural safeguards. We limit access to investors' information to those employees who are trained in the proper handling of nonpublic client information and who need access to the information to perform their job functions.

### **Emerging Markets**

Certain emerging markets countries are particularly likely to require identifying information about entities and persons who have direct, or even indirect, exposure to the securities of issuers in those countries. This may result in CoreCommodity, or the private investment vehicles that we manage, being asked to provide information about investors to emerging markets regulators or to the brokers who are providing services to the private investment vehicles in connection with trading activities. Such information may include, but may not be limited to, the identities, addresses and countries of origin of such investors.