

# **PLATINUM GROVE ASSET MANAGEMENT, L.P.**

## **NOTICE OF PRIVACY POLICY AND PRACTICES**

**AUGUST 17, 2006**

Platinum Grove Asset Management, L.P. (“PGAM” or “we”) recognize and respect the privacy expectations of our customers<sup>1</sup> and we are committed to safeguarding our customers’ nonpublic personal information. PGAM is providing this notice to you so that you will know what types of information we collect about individuals, such as yourself, who apply for or obtain our products or services, how we handle and protect such information, and the circumstances in which that information will be disclosed to third parties who are not affiliated with us. The provisions of this notice apply to former customers as well as current customers.

### **INFORMATION WE COLLECT**

We collect nonpublic personal information about you for business purposes in connection with our investment management operations. Such information is collected from the following sources:

- *Subscription Documents, Account Opening Documents and Other Forms*, which may include information such as your name, address, social security number, income information, net worth, investment experience, educational background and banking information;
- *Account History*, such as information regarding the assets in your account and your account’s transactions, including the parties to a transaction, the positions held or sold, and pricing; and
- *Correspondence*, written, telephonic or electronic between you, us and/or any service providers for your account.

“Nonpublic personal information” is nonpublic information about you that we obtain in connection with providing you with a financial product or service for your personal, family, or household purposes.

### **INFORMATION DISCLOSURE TO THIRD PARTIES**

We do not disclose any nonpublic personal information about you to non-affiliated third parties, except to service providers and as otherwise permitted by law. We do not sell any personal information about you to any third party.

In the normal course of business, all of the nonpublic personal information we collect about you, as described above, may be shared with other persons who provide services in

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<sup>1</sup> For purposes of this notice, the terms “customer” or “customers” includes both clients of ours and individuals who have provided us with nonpublic personal information but have not become our clients.

connection with your account (including brokers, administrators, custodians, accountants or attorneys, as well as any other service providers for your account).

We may also disclose personal information with non-affiliated entities and regulatory authorities as permitted by applicable law. For example, we may disclose such information to cooperate with regulatory authorities and law enforcement agencies and as necessary to protect our rights and property.

## **PROTECTING CONFIDENTIALITY AND SECURITY**

We maintain physical, electronic, and procedural safeguards to protect the nonpublic personal information we have about you. We treat this information in a confidential manner. We restrict access to nonpublic information about you to employees who have an appropriate reason to access it, such as to administer your account or offer our products and services. We educate our employees on the importance of protecting the privacy and security of confidential personal information. In addition, we require third parties with whom we share information to:

- maintain policies and procedures designed to assure only appropriate access to, and use of information about, our customers; and
- maintain physical, electronic and procedural safeguards that comply with federal standards to guard nonpublic information of our customers.