



March 29, 2019

## **PRIVACY POLICY**

Dear Investor,

Your privacy is very important to us and maintaining your trust and confidence is one of our priorities. This policy explains the manner in which Broadfin Capital, LLC (“Broadfin”) collects, utilizes and maintains nonpublic personal information about its investors. All financial companies need to share personal information in order to conduct everyday business. Federal law gives consumers the right to limit some, but not all, sharing and also requires Broadfin to provide this notice to you to inform you how we collect, share, and protect your personal information.

Broadfin’s policy is to require that all employees, financial professionals and companies providing services on its behalf keep investor information confidential.

Broadfin may make changes to its privacy policy in the future. Broadfin will not make any changes affecting an investor or client without sending such investor or client a revised privacy policy describing the change.

### **A. TYPE OF INFORMATION BROADFIN COLLECTS**

The type of personal information we collect from you, or obtain with your authorization, and may share includes:

- Name
- Address
- Nationality
- Social Security Number
- Income
- Transaction history
- Assets
- Wire transfer instructions
- Investment qualifications



## **B. HOW DOES BROADFIN COLLECT YOUR INFORMATION**

We collect your personal information, for example, when you submit a limited partnership agreement, fill out subscription documents or complete wire instructions.

Broadfin does not sell investor information. Broadfin does not disclose nonpublic personal information about its investors to nonaffiliated third parties or to affiliated entities, except as permitted by law.

We provide this information to certain third parties to maintain your account.

When you are no longer our investor, we continue to share your information as described in this notice. In the section on the next page, we list the reasons financial companies may share their personal information, the reasons Broadfin chooses to share, and whether you can limit this sharing.

<b>Reasons we may share your personal information</b>	<b>Does Broadfin Share?</b>	<b>Can you limit this sharing?</b>
For our everyday business operations, such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For marketing purposes - to offer our products and services to you	No	N/A
For joint marketing with other financial companies	No	N/A



To service providers in connection with the administration and servicing of an investor's account, which may include attorneys, accountants, administrators, auditors and other professionals.	Yes	No
To protect against fraud, unauthorized transactions (such as money laundering), claims or other liabilities	Yes	No
For our affiliates' everyday business purposes, such as information about your creditworthiness	No	N/A
For non-affiliates to market products or services to you	No	N/A

**C. HOW BROADFIN PROTECTS YOUR INFORMATION**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. Broadfin restricts access to the personal and account information of investors to those employees who need to know that information in the course of their job responsibilities. These measures include computer safeguards, firewalls, secured files and secure buildings. Third parties with whom Broadfin shares investor information must agree to follow appropriate standards of confidentiality. All Broadfin employees are instructed to protect the confidentiality of your personal information.

**D. WHY CAN'T YOU ELIMINATE ALL SHARING?**

Federal law gives you the right to limit certain types of information sharing that Broadfin does not engage in, such as sharing with our affiliates certain information relating to your transaction history or creditworthiness for their use in marketing to you, or sharing personal information with non-affiliates for them to market to you. State laws and individual companies may give you additional rights to limit sharing.



## **E. DEFINITIONS**

### **Affiliates**

An affiliate is a company related to Broadfin by common ownership or control and can include financial and non-financial companies. Broadfin Advisors, LLC is the general partner to pooled investment vehicles advised by Broadfin and is currently Broadfin's only affiliate.

### **Non-affiliates**

A non-affiliate is a company not related to Broadfin by common ownership or control and can include financial and non-financial companies. Broadfin relies on its fund administrator, prime brokers, auditor, and legal counsel to maintain your account.

### **Joint Marketing**

A formal agreement between non-affiliated financial companies that together market financial products or services to you. Broadfin has not entered into any joint marketing agreements with other financial companies.

If you have any questions, please contact Broadfin Investor Relations at 212-808-2460 or at [investorrelations@broadfincapital.com](mailto:investorrelations@broadfincapital.com).

### **Broadfin Capital, LLC**

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