El Menudo Cuenta LLC Privacy Policy

This privacy policy applies to clients and potential clients of EL Menudo Cuenta LLC (“EMC”) and certain investment vehicles managed by EMC and/or its subsidiaries and affiliates. In accordance with the Securities and Exchange Commission regulations, we are providing the following privacy notice of EMC and the accounts managed by it or its subsidiaries and affiliates (collectively, the “EMC Accounts”). EMC considers customer privacy to be an essential part of our investor relationships and are committed to maintaining the confidentiality, integrity and security of our current, prospective and former investors’ non-public personal information. EMC has developed policies that are designed to protect this confidentiality, while permitting investor needs to be served.

Obtaining Personal Information

While providing investors with products and services, EMC, and certain service providers, such as the EMC Account Custodians and/or Administrators, may obtain non-public personal information about investors, which may come from sources such as (i) account applications, subscription agreements and other forms, (ii) written, electronic or verbal correspondence, (iii) investor transactions, (iv) an investor’s brokerage or financial advisory firm, financial advisor or consultant, and/or (v) from information captured on applicable websites. The non-public personal information that may be collected from investors may include the investor’s name, address, tax identification number, birth date, investment selection, beneficiary information, and possibly the investor’s personal bank account information and/or email address if the investor has provided that information, as well as the investor’s transaction and account history with EMC and the EMC Accounts.

Respecting Your Privacy

EMC does not disclose any non-public personal information provided by investors or gathered by EMC to third parties, except as required or permitted by law or as necessary for such third parties to perform their agreements with respect to EMC and the EMC Accounts. Non-affiliated companies may from time to time be used to provide certain services, such as maintaining investor accounts, preparing and mailing prospectuses, reports, account statements and other information, and gathering shareholder proxies. In many instances, the investors will be clients of a third party, but EMC and the EMC Accounts may also provide an investor’s personal and account information to the investor’s respective brokerage or financial advisory firm and/or financial advisor or consultant.

Sharing Information with Third Parties

EMC reserves the right to report or disclose personal or account information to third parties in circumstances where EMC believes in good faith that disclosure is required or permitted under law, to cooperate with regulators or law enforcement authorities, to protect its rights or property, or upon reasonable request by EMC. In addition, EMC may disclose information about an investor or an investor’s accounts to a third party at the investor’s request or with the consent of the investor.

Procedures to Safeguard Private Information

EMC is committed to its obligation to safeguard investor non-public personal information. In addition to this policy, EMC has implemented procedures that are designed to limit access to an investor's non-public personal information to internal personnel who require the information to complete tasks, such as processing transactions, maintaining client accounts or otherwise providing services the investor requested. Physical, electronic and procedural safeguards are in place to guard an investor's non-public personal information.

Information Collected from Websites

Websites maintained by EMC or its service providers may use a variety of technologies to collect information that helps EMC, the EMC Accounts and their service providers understand how the website is used. Information collected from your web browser (including small files stored on your device that are commonly referred to as "cookies") allow the websites to recognize your web browser and help to personalize and improve your user experience and enhance navigation of the website. If you are a registered user of EMC's and/or its service providers' website, EMC, its service providers, or third party firms engaged by EMC and/or its service providers, may collect or share information submitted by you, which may include personally identifiable information. You can change your cookie preferences by changing the setting on your web browser to delete or reject cookies. If you delete or reject cookies, some website pages may not function properly. EMC does not look for web browser "do not track" requests.

Changes to the Privacy Policy

From time to time, EMC may update or revise this privacy policy. If there are changes to the terms of this privacy policy, documents containing the revised policy on the relevant website will be updated.

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