

# European Investor Privacy Notice

*Effective Date: June 16, 2025*

The purpose of this personal data privacy notice is to inform you about how your personal data (i.e., information which directly or indirectly identifies you) is processed by us. By investing in and providing your personal data to the D. E. Shaw group fund identified in your Subscription Agreement (the “**Fund**”), the Fund may process your personal data or that of your directors, officers, employees and/or beneficial owners. Your personal data will also be processed by D. E. Shaw & Co., L.P.<sup>1</sup> (in its capacity as an investment adviser to the Fund) and D. E. Shaw & Co. (London), LLP (in its capacity as an investment manager to, and placement agent for, the Fund). For the purposes of this privacy notice, references to “**we**” “**us**” or “**our**” refers collectively to the Fund, D. E. Shaw & Co., L.P., and D. E. Shaw & Co. (London), LLP. We are data controllers of your personal data.

Please ensure that you provide a copy of this privacy notice to any third parties whose personal data you provide to us (such as your directors, officers, employees, and/or beneficial owners).

## 1. What categories of personal data do we collect about you?

We may collect some or all of the following information about you:

- **Contact Information** such as your name, address, and contact details, including email address and telephone number;
- **Identification Information** such as your passport details or details of any other government-issued document evidencing your nationality or residence and including your name, picture, date and place of birth, signature, country of issuance and number, verification of the residential address you provide to us, which may take the form of a utility bill or other correspondence;
- **Tax Information** such as information necessary for tax compliance and reporting, including any government-issued tax identification number;
- **Financial Information** such as your net worth and/or source(s) of wealth and bank account;
- Professional or Employment-related Information such as your job history;
- **Commercial Information** such as the investment products you invest in, your estimated level of account activity and your FINRA registration status;

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<sup>1</sup> The investment adviser for the Fund identified in your Subscription Agreement (the “**Fund Investment Adviser**”) may be an investment advisory affiliate of D. E. Shaw & Co., L.P. In that case, references to D. E. Shaw & Co., L.P., in this notice should be construed as referring also to the Fund Investment Adviser.

- **Political Opinions Information** such as details about your status as a politically exposed person or relationship thereto;
- **Criminal Convictions and Offences Data** such as information collected about criminal convictions or offences, government sanctions, or negative news, in the course of conducting a “Know Your Customer” check;
- **IT Information** such as information about your interactions with our websites and online services (including [www.deshaw.com](http://www.deshaw.com) and the secure investor section thereof), which may include your network domain or IP address (collectively “online usage data”). Our [Online Privacy Statement](#) provides further information about our online privacy practices, including about our collection of online usage data and the use of cookies; and
- Any other information that you voluntarily provide to us.

We may also collect the personal data listed above from third parties, such as your investment adviser, family office representative, the organization to which you are affiliated, another person designated by you to manage your investments, and from third party data services.

## 2. What is your personal data used for?

Your personal data may be processed by us (or any of our affiliates, agents, employees, delegates or (sub) contractors) for the following purposes and in reliance on the following legal bases:

Categories of Personal Data	Purpose of Processing	Legal Basis for Processing if You are Investing with Us as an Individual	Legal Basis for Processing if a Company You are Affiliated with is Investing with Us
All categories in Section 1 above.	To review and process your subscription agreement and supporting materials in connection with your investment in the Fund	Performance of a contract	Our legitimate interest to effectively and efficiently manage our business
	To administer and manage investments and communications and to update and maintain records	Performance of a contract	Our legitimate interest to provide you with certain information, respond to your communications and keep records in case of complaints/legal claims
	To enforce or defend our rights, ourselves or through third parties to whom we delegate such responsibilities	Performance of a contract	Our legitimate interest to manage our business and to ensure that all investigations and proceedings etc. are managed

Categories of Personal Data	Purpose of Processing	Legal Basis for Processing if You are Investing with Us as an Individual	Legal Basis for Processing if a Company You are Affiliated with is Investing with Us
			efficiently and effectively
	To fulfil our legal and regulatory obligations	Legal obligation	
	The day to day running and management of our business including, to perform general, financial and regulatory accounting and reporting This may include the use of artificial intelligence tools to help improve the efficiency and speed of these business processes	Our legitimate interest to effectively and efficiently manage our business	
	To comply with our legal obligations relating to the prevention of fraud and the detection of money-laundering or other criminal conduct	Legal obligation	
	To investigate and resolve complaints and manage contentious regulatory matters, investigations and litigation	Legal obligation Our legitimate interest to manage our business and ensure compliance with legal and regulatory obligations	
	To share such personal data with third parties that acquire or are interested in acquiring all or part of our assets or shares, or that succeeds us in carrying on our business	Our legitimate interest to conduct our business, evaluate, complete and administer transactions – including, seeking advice from professional	
Contact Information	To update and manage our relationship with you	Performance of a contract	
Contact Information, IT Information	To monitor electronic communications for investigation and fraud prevention purposes, crime detection, prevention and investigation	Legal obligation Our legitimate interest to ensure our systems are secure and that individuals are using our systems correctly	
	To monitor, maintain and improve the processes, information and data, technology and communications solutions and services used by us	Our legitimate interest to ensure our systems are secure and that individuals are using our systems correctly	

If you are a director, officer, employee, authorized signatory, or beneficial owner of a Fund investor, we process personal data about you in connection with the purposes (and in reliance on the legal bases) described above, including to contact you in our legitimate interest to administer and manage the relevant investment relationship.

When we conduct “Know Your Customer” and related anti-money laundering and sanctions’ law checks, we use third party data services. Those services access information published by government authorities, as well as information available both in the public domain and from proprietary news and related sources. That information may or may not identify you. If it does, it could involve the processing of criminal records or other sensitive data. Irrespective of whether we obtain such data from you or from a third party, we will process it solely for the limited purpose described above and as authorized by law.

In addition to the legal bases set out in the table above, where processing criminal convictions and offences data as part of the above activities, we will rely on processing in the substantial public interest (either where we have regulatory requirements relating to unlawful acts and dishonesty or where there is a suspicion of terrorist financing or money laundering). The processing of Political Opinions Information, is carried out where in the substantial public interest where we have regulatory requirements relating to unlawful acts and dishonesty.

Failure to provide personal data in whole or in part could make it impossible for us to proceed with your application to invest in the Fund and we may be unable to process or release your investment in the Fund. This may result in the Fund terminating its relationship with you.

**Your right to object—Please note that you have a right to object to the processing of your personal data where that processing is performed for our legitimate interests.**

### **3. To whom do we disclose your personal data?**

We may disclose your personal data for the purposes described above to the following recipients:

- your service providers, such as your investment adviser, family office representative, or another person designated by you to manage your investments;
- our affiliates, service providers (such as transfer agents, fund administrators, custodians, and broker-dealers), and advisors (such as accountants and legal counsel);
- fraud prevention agencies and law enforcement agencies;
- courts, governmental and non-governmental regulators, and ombudsmen;
- any third party that acquires, or is interested in acquiring or securitizing, all or part of our assets, shares, partnership interests, and/or membership interests, or that succeeds us in carrying on all or a part of our businesses, whether by merger, acquisition, reorganization, or otherwise;
- as required or permitted by law, including to comply with a subpoena or similar legal,

- regulatory, or governmental request or process, or where we believe in good faith that disclosure is legally required;
- when we have a legitimate interest in making a disclosure, such as where necessary to
- protect our rights and property; or
- anyone to whom you authorize us to make such disclosure.

We may transfer your personal data, in accordance with a valid transfer mechanism under applicable law (e.g., an EU/UK adequacy decision or EU standard contractual clauses) for the purposes described above to recipients (including the Fund and D. E. Shaw & Co., L.P.) located in countries outside of the European Economic Area (“EEA”) and the United Kingdom (“UK”), including in the United States, which may not have data protection laws equivalent to those in the EEA and/or the UK. D. E. Shaw London has entered into intra-group standard contractual clauses for transfers of personal data within the D. E. Shaw group. If we transfer personal data to other recipients outside of the EEA and/or the UK, we will ensure such transfer is made in compliance with applicable data protection and privacy laws (e.g., by entering into standard contractual clauses with the recipient, relying on the recipient’s Binding Corporate Rules, or by relying on a derogation such as, where the transfer is necessary for performance or a contract or the establishment or defense of legal claims).

You can request further details in relation to international transfers, including a copy of any standard contractual clauses by using the contact details provided below.

#### **4. For how long do we keep your personal data?**

We will retain your personal data for investor relations-related activities, including administering investment accounts and for organizing events with investors, in accordance with our internal data retention procedures. The criteria used to determine the retention periods include: (i) how long the personal data is needed in connection with the investor relations-related activities; (ii) the type of personal data collected; and (iii) whether we are subject to a legal, contractual or similar obligation to retain the data (e.g., mandatory data retention laws, government orders to preserve data relevant to an investigation, or data that must be retained for the purposes of litigation or disputes).

If you would like more information about applicable data retention policies, please contact us as described in the Contact Us section below.

#### **5. Your Rights**

You have a right to:

- request access to and rectification or erasure of your personal data;
- obtain restriction of processing or object to processing of your personal data;

- request a copy of your personal data to be provided to you, or a third party, in a digital format; and
- withdraw consent to the processing of your personal data where we are relying on your consent for such processing. Such withdrawal shall not affect the lawfulness of processing based on consent before its withdrawal.

We will respond to your request in writing, or orally if requested, as soon as practicable and in any event not more than one month after receipt and verification of your request. In exceptional cases, we may extend this period by two months and we will tell you why. You may exercise your rights by emailing us as described in the Contact Us section below.

You also have the right to file a complaint about the processing of your personal data with the UK [Information Commissioner's Office](#) or, if you are in the EEA, with your [local data protection authority](#).

## 6. Changes to this privacy notice

The effective date on this notice indicates the date on which this notice was last updated. We periodically will review and may modify this privacy notice. We will notify you of any material changes.

## 7. Contact Us

All questions, requests, or concerns regarding this privacy notice or relating to the processing of your personal data, including all requests as detailed in the “Your rights” section above, should be sent to [privacy@deshaw.com](mailto:privacy@deshaw.com).

D. E. Shaw & Co., L.P. is located at 375 Ninth Avenue, New York, NY 10001, United States, and can be contacted by emailing [privacy@deshaw.com](mailto:privacy@deshaw.com).

D. E. Shaw & Co. (London), LLP is located at 55 Baker Street, Seventh Floor, London W1U 8EW, United Kingdom, and can be contacted by emailing [privacy@deshaw.com](mailto:privacy@deshaw.com).

D. E. Shaw & Co., L.P., and D. E. Shaw & Co. (London), LLP, have appointed D. E. Shaw & Co. (Luxembourg), S.à r.l. (“D. E. Shaw Luxembourg”) as their data protection representative in the European Union. D. E. Shaw Luxembourg is located at 11, rue Sainte Zithe, 2ème Etage, L-2763 Luxembourg, and can be contacted by emailing [privacy@deshaw.com](mailto:privacy@deshaw.com).