

## **TAB E – Privacy Policy**

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*Effective as of December 22, 2025*

### **Accountability**

Raintree is responsible for all client confidential information under its control, with the CCO having ultimate responsibility for proper treatment of client's confidential personal information.

### **Purpose For Collection of Information**

Raintree collects confidential client information only for the purposes of complying with securities laws requiring the collection of client information.

No such information will be used for anything other than the above-stated purpose without a client's prior written consent.

### **Consent**

The knowledge and consent of the client are required for the collection of personal information and the subsequent use or disclosure of the information. This consent is obtained from a client by having them sign Raintree's KYC form, which they complete prior to their first investment with Raintree. In obtaining consent, the reasonable expectations of the client must always be considered and respected.

A client may withdraw consent at any time, subject to legal or contractual restrictions and reasonable notice. Raintree representatives must inform the individual of the implications of such withdrawal.

Where electronic communications (including SMS) are used, express consent must be obtained and documented in accordance with applicable anti-spam and electronic communications legislation. Clients may withdraw such consent at any time, subject to legal or contractual restrictions. Withdrawal of consent for electronic communications must be documented and processed promptly.

### **Limiting Collection**

The collection of personal information is limited to that which is necessary for the purposes identified above, without deception. Personal information cannot be collected indiscriminately. Both the amount and the type of information collected must be limited to that which is necessary to fulfill the purposes identified.

### **Limiting Use, Disclosure, and Retention**

It is prohibited to disclose client information for purposes other than those for which it was collected, except with the consent of the client or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes. If personal information is used for a new purpose, Raintree employees must document this purpose. Client information will be retained for a period of seven years following the end of the client relationship. After seven years, all client documentation must be destroyed in a manner which will prevent unauthorized disclosure of such information.

Client mobile phone numbers and SMS consent collected for communication purposes shall not be shared, sold, transferred, disclosed, or made available to any third party, affiliate, partner, or service provider for marketing or SMS purposes. Such information shall be used exclusively by Raintree for client communication purposes and shall not be disclosed except as required by law.

### **Accuracy**

Client information must be accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used and as appropriate considering the interests of the client. Client information can only be routinely updated so long as it is necessary to fulfill the purposes for which the information was collected. Our policy is to update our client information at least annually as long as they remain current clients of ours. Client information that is used on an ongoing basis, including information that is disclosed to third parties, should generally be accurate and up-to-date, unless limits to the requirement for accuracy are clearly set out.

### **Safeguards**

Security safeguards appropriate to the sensitivity of the information must protect client information. The security safeguards protect client information against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. Raintree requires that all confidential information be maintained in designated secured areas or electronic databases which are properly secured through password protection, access controls, encryption where appropriate, and other technical safeguards consistent with industry standards

### **Openness**

All clients have a right to access specific information about Raintree policies and procedures relating to the management of client information.

All such requests should be addressed to the CCO.

The CCO will provide the client with access to all of their client information currently retained by Raintree.

All clients will be made aware of the existence of this Privacy Policy and be provided with a copy upon request.

Upon request, a client shall be informed of the existence, use, and disclosure of their personal information and shall be given access to that information. A client is able to challenge the accuracy and completeness of the information collected and has it amended as appropriate.

### **Challenging Compliance**

A client may address a challenge concerning compliance with this Privacy Policy to the CCO. The concern will be handled by the CCO in accordance with Raintree's Client Complaint Process.