



Privacy Policy

July 23, 2018

Your Privacy Is Our Priority

At Fred Alger & Company, Incorporated ("Alger") we value the confidence you have placed in us. In trusting us with your assets, you provide us with personal and financial data. Alger is committed to maintaining the confidentiality of the personal nonpublic information ("personal information") entrusted to us by our customers. Your privacy is very important to us, and we are dedicated to safeguarding your personal information as we serve your financial needs.

Our Privacy Policy

We believe you should know about Alger's Privacy Policy and how we collect and protect your personal information. This Privacy Policy ("Policy") describes our practices and policy for collecting, sharing and protecting the personal information of our prospective, current and former customers. The Policy is applicable to Alger and its affiliates, as well as the products Alger and its affiliates distribute or manage.

Information We Collect

The type of personal information we collect and use varies depending on the Alger products or services you select.

We collect personal information that enables us to serve your financial needs, develop and offer new products and services, and fulfill legal and regulatory requirements. Information that we collect and use includes:

- Information about who you are. (e.g. Name, Date of Birth, contact details, government identification number)
- Information associated with your product or service. (e.g. bank account details and purchases and redemptions of fund shares)
- Information about contact with us. (e.g. meetings, phone calls, letters and emails/electronic messaging)
- Information that is collected automatically. (e.g. via cookies when accessing our web site)
- Information collected when visiting one of our offices. (e.g. images collected via closed-circuit TV (CCTV))

Occasionally, we conduct voluntary surveys regarding our website or other products of services. The information you provide is used collectively for analytical purposes. You will never receive unsolicited communications as a result of your participation in a survey if you notify us not to contact you.

Why We Collect Personal Information

We collect and process your personal information only as necessary or appropriate for our business purposes. There are certain lawful bases for which we are allowed to use your personal data. Most commonly, we will rely on one or more of the following lawful bases for processing your personal data:

- where it is necessary for the performance of the contract;
- where it is necessary for compliance with a legal obligation to which we are subject; and/or
- where it is necessary for the purposes of the legitimate interests pursued by us or a third party, except where such interests are overridden by your interests or fundamental rights and freedoms, which require protection.
- where you have provided consent as required by applicable law, we may send you information regarding Alger products and services.

Generally we do not rely on your consent as a lawful basis for processing your personal data.

Sharing of Personal Information

We may share your personal information with our affiliates so that they may process and service your transactions.

However, Alger never sells customer lists to any third party. Further, we do not disclose personal information to nonaffiliated third parties, except as required by law or as permitted by law to service your account, such as follows:

- To third-party service providers that assist us in servicing your accounts (e.g. securities clearinghouses);
- To governmental agencies and law enforcement officials (e.g. valid subpoenas, court orders); and
- To financial institutions that perform marketing services on our behalf or with whom we have joint marketing agreements that provide for the confidentiality of personal information.

Transfer of Personal Information Outside of the European Economic Area (EEA)

For the abovementioned purposes, the personal information listed in this policy may be transferred to our affiliates or non-affiliated third parties established in countries outside of the EEA. Where data is processed outside of the EEA, we take steps to ensure that information is protected to at least the levels applied by EEA privacy laws. (e.g. putting legal agreements in place with third parties who process personal information and do regular checks to ensure they meet these obligations.)

Your rights in relation to your information

You have rights as an individual which you can exercise in relation to the information we hold about you under certain circumstances. These rights are to:

- request access to your personal data (commonly known as a data subject access request) and request certain information in relation to its processing;
- request rectification of your personal data;
- request the erasure of your personal data;
- request the restriction of processing of your personal data;
- object to the processing of your personal data; and
- request the transfer of your personal data to another party.

If you want to exercise one of these rights, please contact the Data Privacy Office at dataprivacy@alger.com. You also have the right to make a complaint at any time to your respective member state's Supervisory Authority (e.g. The Information Commissioner's Office (ICO) in the UK) for data protection issues.

Retention

We will retain your personal information for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements and our legitimate interests in maintaining such personal information in our records. This will normally include any period during which we are dealing or expect to deal with you and what we consider to be a suitable period thereafter for our internal-record keeping purposes in accordance with our record keeping procedures.

Online Privacy

Online security is extremely important to us. Please be aware that Alger utilizes the following online practices.

We may place cookies and similar files on your hard drive for purposes such as security, to facilitate site navigation, and to personalize your experience on our site. Our cookies do not identify you by name as an individual or by account number, nor do they store email addresses or pull any data from your hard drive.

When you visit Alger's Internet sites, we may collect technical and navigational information, such as computer browser type, Internet protocol address, pages visited, and average time spent on our Web sites. This information may be used, for example, to alert you to software compatibility issues, or it may be analyzed to improve our Web design and functionality.

We may use third-party service providers to help us analyze certain online activities. For example, these service providers may help us measure the performance of our online advertising campaigns or analyze visitor activity on our Web sites. We may permit these service providers to use cookies and other technologies, such as Web beacons or pixel tags, to perform these services for Alger. We do not share personally identifiable information about our customers with these third-party service providers, and these service providers do not collect such information on our behalf.

Our Security Practices

We protect your personal information by maintaining physical, electronic and procedural safeguards. We have implemented controls to ensure that access to personal information is limited to employees who require such information to carry out their job responsibilities. Our employees are trained and aware of their strict responsibility to respect the confidentiality of your personal information and participate. When third parties are used, we require them to protect the confidentiality of personal information they receive.

Our security controls are aligned with industry standards; providing an environment that effectively manages risks to the confidentiality, integrity and availability of your data.

Effective Date and Additional Changes

The effective date of this Policy is July 23, 2018. If we revise it, we will update the effective date. You can determine whether there have been any changes to the Policy by checking the effective date.

Thank you for choosing to invest with Alger. We value your relationship with us and assure you we will abide by our policy to protect your information.

Contact Information

If you require any further information, please do not hesitate to contact Alger's Data Privacy Office at dataprivacy@alger.com.