



Last Updated August 2023

Your Privacy Is Our Priority

At 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 Associates, Inc., its affiliates and subsidiaries, as well as the products Alger and its affiliates distribute or manage (“Alger”).

If you are an investor in one of our U.S. registered investment companies, you may review Alger’s U.S. Funds Privacy Notice at the back of your most recently received annual or semi-annual shareholder report.

Information We Collect

The type of personal information we collect and use varies depending on the context of your interaction with us and our website.

We collect personal information that enables us to serve your financial needs, develop and offer new products and services, maintain our business operations, 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 website); and
- Information collected when visiting one of our offices (e.g., images collected via closed-circuit TV (CCTV)).

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 a contract;
- where it is necessary for compliance with a legal obligation to which we are subject;
- where it is necessary for the purposes of the legitimate interests pursued by us or a vendor, except where such interests are overridden by your interests or fundamental rights and freedoms, which require protection; and/or
- 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 personal information to any vendor. Further, we do not disclose personal information to

nonaffiliated entities, except as required by law or as permitted by law to service your account or for a permissible business or commercial purpose, such as in the following instances:

- To vendors that assist us in servicing your accounts (e.g., securities clearinghouses);
- To vendors that help us manage our business interests (e.g., customer relationship management software companies);
- 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 entities 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 vendors who process personal information and do regular checks to ensure they meet these obligations.)

Your rights in relation to your information

Based on where you live, you may have rights as an individual which you can exercise in relation to the information we hold about you under certain circumstances. These rights may include:

- receive a notice of the types of personal data we may collect and what we may do with this personal data before or at the time we collect your personal data;
- 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 Alger's Data Privacy Office at (800) 223-3810 or 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

Some of our web pages and emails may use 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 websites. 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 vendors to help us analyze certain online activities. For example, these vendors may help us measure the performance of our online advertising campaigns or analyze visitor activity on our websites. We may permit these vendors 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 vendors, and these vendors do not collect such information on our behalf.

You can generally manage your cookie preferences through your web browser. Most web browsers will tell you how to stop accepting new cookies and how to disable existing cookies. For more information regarding how to manage your

preferences, please consult the information made available by your particular browser. Additionally, you may enable the [Global Privacy Control \("GPC"\)](#) in your browser. When enabled in your web browser, the GPC automatically opts you out of tracking cookies upon visiting our website.

As set out above, we and non-affiliated vendors collect and use your personal information for online tracking and interest-based advertising. Cookies can be managed on Alger's website by clicking on "Cookie Preferences" in the site's footer. If you opt-out of interest-based advertising using this tool, an "opt-out cookie" will be placed on your device. Opt-out cookies are device- and browser-specific, meaning that you must opt-out across all of your devices and browsers in an effort to stop receiving targeted ads. If you clear your cache or delete cookies from your browser, the opt-out cookie will also be deleted, meaning you will need to opt-out again.

Our Security Practices

We seek to protect your personal information by maintaining physical, electronic and procedural safeguards. We have implemented controls which we believe are designed to ensure that access to personal information is limited to employees and vendors who require such information to carry out their responsibilities. Our employees are trained to be aware of their responsibility to respect the confidentiality of your personal information. When non-affiliated entities are used, we ask them to protect the confidentiality of personal information they receive.

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

California Residents

The California Consumer Privacy Act ("CCPA") and California Privacy Rights Act ("CPRA" and together with CCPA, the "CA Privacy Laws") provide California residents privacy rights with respect to certain personal information. These rights may include the:

- right to know how we have collected and used your personal information over the last twelve months and whether or not we have sold or shared your personal information;
- right to request that we delete your personal information that we have collected or received;
- right to request that we correct inaccurate personal information that we maintain;
- right to direct us not to sell or share your personal information to third parties;
- right to limit our use and disclosure of your sensitive personal information; and
- right not to be discriminated against by us for choosing to exercise your rights under the CA Privacy Laws.

Most of the personal information we collect about California residents is not covered by the CA Privacy Laws at this time. The CA Privacy Laws include certain exemptions that may apply to our collection and processing of your personal information. Therefore, it is possible that not all personal information we collect from or about you is fully covered by the CA Privacy Laws. Accordingly, the CA Privacy Laws privacy rights set out herein may not apply to you or to all of your personal information. For example, the following personal information is not covered by the CA Privacy Laws:

- Personal information that is collected, processed, shared, sold or disclosed pursuant to the federal Gramm Leach Bliley Act ("GLBA") and implementing regulations is not covered by the CA Privacy Laws. To understand how we collect, use and share your nonpublic personal information in accordance with the GLBA, please read our U.S. Funds Privacy Notice, which is available at the back of your most recently received annual or semi-annual shareholder report.
- Publicly available information, de-identified data and aggregate California resident information (as those terms are used in the CA Privacy Laws) are not personal information for purposes of the CA Privacy Laws.

Contact Information

If you require any further information, please do not hesitate to contact Alger's Data Privacy Office:

Phone: (800) 223-3810

Email: dataprivacy@alger.com