

**TRILINC GLOBAL IMPACT FUND, LLC**  
**PRIVACY POLICY**

Implementation Date: January 2013

Amendment Date: February 2014

# TRILINC GLOBAL IMPACT FUND, LLC

## Privacy Policy

Implementation Date: June 2013  
Amendment Dates: February 2014

---

### I. Policy

We consider unitholder privacy to be fundamental to our relationships with our unitholders. In the course of serving your account, we collect personal information about you (“Nonpublic Personal Information”). We are committed to maintaining confidentiality, integrity and security of our unitholders’ personal information. It is our policy to respect the privacy of our current and former unitholders and to protect the personal information entrusted to us. This privacy policy (“Privacy Policy”) describes the standards we follow for handling your personal information and how we use the information we collect about you.

#### Information We May Collect

We may collect Nonpublic Personal Information about you from the following sources:

- Information on applications, subscription agreements or other forms which may include your name, address, e-mail address, telephone number, tax identification number, date of birth, marital status, driver’s license number, citizenship, assets, income, employment history, beneficiary information, personal bank account information, broker/dealer, financial advisor, IRA custodian, account joint owners and similar parties;
- Information about your transactions with us, our affiliates and others, such as the types of products you purchase, your account balances and transactional history; and
- If you visit our Web site, information we collect via web server, often referred to as “cookies.” Cookies indicate where a site visitor has been online and what has been viewed.

#### Why We Collect Nonpublic Personal Information

We collect information from and about you:

- in order to identify you as a unitholder;
- in order to establish and maintain your unitholder accounts;
- in order to complete your unitholder transactions;
- in order to communicate and share information with your broker/dealer, financial advisor, IRA custodian, joint owners and other similar parties acting at your request and on your behalf; and
- in order to meet our obligations under the laws and regulations that govern us.

## Use and Disclosure of Information

We may disclose Nonpublic Personal Information we collect about you as described above to the following types of third parties:

- *Our Affiliated Companies.* We believe that by sharing information about you and your accounts among our companies, we are better able to serve your investment needs. We may share your Nonpublic Personal Information with our affiliates for the purposes listed above, as well as to suggest educational materials that may be of interest to you.
- *Other Nonaffiliated Third Parties.* Except as outlined below, we do not share your Nonpublic Personal Information with nonaffiliated third parties. However, we may disclose your Nonpublic Personal Information to the extent permitted, or as required, by law. For example, to:
  - correct technical problems and malfunctions in how we provide our products and services to you and to technically process your information
  - protect the security and integrity of our records, Web Site and unitholder service center;
  - protect our rights and property and the rights and property of others;
  - take precautions against liability;
  - respond to claims that your information violates the rights and interests of third parties;
  - take actions required by law or to respond to judicial process;
  - assist with detection, investigation or reporting of actual or potential fraud, misrepresentation or criminal activity; and
  - provide personal information to law enforcement agencies or for an investigation on a matter related to public safety to the extent permitted under other provisions of law.

## **II. Procedures**

### Protecting Your Information

Our employees are required to follow the procedures we have developed to protect the integrity of your information. These procedures include:

- Restricting physical and other access to your Nonpublic Personal Information to persons with a legitimate business need to know the information in order to service your account;
- Contractually obligating third parties doing business with us to keep your Nonpublic Personal Information confidential and secure and to use it only as authorized by us;
- Providing information to you only after we have used reasonable efforts to assure ourselves of your identity by asking for and receiving from you information only you should know; and

- Maintaining reasonably adequate physical, electronic and procedural safeguards to protect your information.

#### Former Unitholders

We treat information concerning our former unitholders the same way we treat information about our current unitholders.

#### Keeping You Informed

We will provide notice of our Privacy Policy annually, as long as you maintain an ongoing relationship with us. If we decide to change our Privacy Policy, we will post those changes on our Website so our unitholders are always aware of what information we collect, use and disclose. If at any point we decide to use or disclose your Nonpublic Personal Information in a manner different from that stated at the time it was collected, we will notify you in writing, which may be by email. If you object to the change to our Privacy Policy, then you must contact us using the information provided in the notice. We will otherwise use and disclose a unitholder's Nonpublic Personal Information in accordance with the Privacy Policy.

#### Questions about our Privacy Policy

If you have any questions about our Privacy Policy, please contact us via telephone at 310.997.0580 or email Marni Hodder, Compliance Officer at [mhodder@trilincglobal.com](mailto:mhodder@trilincglobal.com).

Residents of some states may have additional privacy rights. We adhere to all applicable state laws.