

ADVENT CAPITAL MANAGEMENT, LLC

**Privacy Notice
For Individual Advent Clients**

FACTS	WHAT DOES ADVENT DO WITH YOUR PERSONAL INFORMATION?	
Why?	<p>Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Protecting your privacy is fundamental to the way Advent Capital Management, LLC does business. This Privacy Notice explains the type of information we collect from our individual clients in order to provide investment advisory and private fund products and services; how we may use or disclose that information; and the measures we take to safeguard that information. Please read this notice carefully to understand what we do.</p>	
What?	<p>The types of personal information we collect and share depend on the product or service you have with us. This information can include:</p> <ul style="list-style-type: none"> ■ Social Security number and tax identification numbers; ■ Account balances and wire transfer instructions. ■ Account transactions and assets; ■ Investment experience; ■ Family and marital status ■ Name, address and telephone number(s) ■ Financial circumstances and income ■ Consumer information ■ Securities holdings and positions ■ Trading and transaction history ■ Customer information from third party sources including services providers and tax preparers ■ Income and expenses ■ Assets and Liabilities <p>When you are no longer our customer, we continue to use, share and safeguard your information as described in this notice.</p>	
How?	<p>All financial companies need to share clients' personal information to manage their everyday business. We use Client Information to provide and service our products and services, provide advice and information to help you meet your financial objectives, including information about other products and services that may be of interest and to fulfill our obligations to the SEC, FINRA, FinCEN, OFAC, and any other regulatory or government body to whom we are required to report or to fulfill certain background checks relating to the USA Patriot Act as regards our pooled investment vehicles. In the section below, we list the reasons financial companies can share their members' personal information; the reasons Advent chooses to share; and whether you can limit this sharing.</p>	
Reasons we can share your personal information	Does Advent share?	Can you limit this sharing?

For our everyday business purposes— such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes— to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	We don't share
For our affiliates' everyday business purposes— information about your transactions and experiences	No	We don't share
For our affiliates' everyday business purposes— information about your creditworthiness	No	We don't share
For our affiliates to market to you	No	We don't share
For nonaffiliates to market to you	No	We don't share
How to Opt-Out of Disclosures	If you prefer that we not disclose nonpublic personal information about you to nonaffiliated third parties, you may opt out of those disclosures, that is, you may direct us not to make those disclosures (other than disclosures permitted by law). If you wish to opt out of disclosures to nonaffiliated third parties, you may (1) call us at 212-482-1600 between the hours of 8 a.m. and 6 p.m. Monday through Friday or (2) write to us at 888 Seventh Avenue, 31 st Floor, New York, New York 10019, and include your name, address and account number. Please note: If you are a new client, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our client, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.	
Questions?	Call 212-230-9200 or go to www.adventcap.com	
Who we are		
Who is providing this notice?	Advent Capital Management, LLC Advent Global Partners Master Fund, LP (feeder funds below) <ul style="list-style-type: none"> • Advent Global Partners (Cayman) Fund • Advent Global Partners Fund, LP Advent Vega Master Fund, LP (feeder funds below) <ul style="list-style-type: none"> • Advent Vega (Cayman) Fund • Advent Vega Fund, LP 	
What we do		
How does Advent protect my personal information?	To protect your personal information from unauthorized access and use, we use commercially reasonable security measures that comply with federal law and protect Client Information from unauthorized access and disclosure. These measures include computer safeguards and secured files and offices. All Advent employees are bound by codes of professional conduct, to protect the confidentiality of Client Information, and to prevent unauthorized use, access to, or disclosure of Client Information. The use of, and access to Client Information is restricted to those employees who need to know that information to provide services to you.	
How does Advent collect my personal information?	We collect your personal information, for example, when you	

	<ul style="list-style-type: none"> ■ open an account or provide initial or updated account information; ■ give us your contact information or make a wire transfer; ■ buy securities from us; <p>We also collect your personal information from others, such as affiliates, credit bureaus or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> ■ sharing for affiliates' everyday business purposes— information about your creditworthiness ■ affiliates from using your information to market to you ■ sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ Our affiliates include the Advent companies.
Client Information	<p>Non-public personal (personally identifiable) information about you as described in this section to provide our services.</p>
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> ■ Non-affiliates we share with can include fund administrators, custodians, brokers, dealers, counterparties, accountants, auditors, and legal and tax advisers.
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> ■ Advent doesn't jointly market.