

CHESAPEAKE CAPITAL CORPORATION

Investor Privacy Policy

Chesapeake takes its responsibility to protect the privacy and confidentiality of its investors' non-public personal information seriously. Chesapeake maintains physical, electronic, and procedural protections in accordance with Federal standards to safeguard each of its investors' non-public personal information and to prevent unauthorized access to that information. Chesapeake requires its affiliates, as well as non-affiliated third parties who perform services on Chesapeake's behalf, and to whom Chesapeake discloses non-public personal information about Chesapeake's investors, to agree to adhere to confidentiality, security and use standards consistent with the Chesapeake's own Privacy Policies standards.

This statement describes Chesapeake's policies and practices ("Privacy Policies") for collecting, handling, sharing and securing non-public personal information Chesapeake obtains about its individual clients and investors. As used in this statement, "non-public personal information" means non-public personally identifiable financial information Chesapeake obtains about individual clients and investors (not entities) in connection with Chesapeake's services to those clients and investors. This statement includes examples of the types of information Chesapeake may collect and the kinds of persons with whom it may share information. These examples are illustrative and should not be considered a complete inventory of Chesapeake's information collecting or sharing practices.

Chesapeake collects and maintains non-public personal information about individual clients and investors as follows:

- Information Chesapeake receives on Chesapeake subscription documents, investor questionnaires and related forms, and on other forms which investors complete and submit to Chesapeake and other information provided in writing, in person, by telephone, by electronic communication (such as through Chesapeake's website), or by any other means containing for example, name, date of birth, address, telephone numbers, social security number, nationality, e-mail address, broker's name, selling agent's name, employment, approximate net worth and approximate annual income and investment information and experience;
- Information about investment and other transactions (for example, account activity and balances) with Chesapeake and its affiliates;
- Information Chesapeake receives from consumer reporting agencies, such as an investor's credit history;

- Information Chesapeake receives from purchaser representatives, financial advisers, investment consultants or other financial institutions; and
- Information Chesapeake creates, receives or maintains relating to an investor's capital account, such as, for example, profit and loss allocations and capital withdrawals and additions.

Chesapeake may share any of the non-public personal information that it collects about its clients and investors with Chesapeake's affiliates and their employees to enable Chesapeake to provide statements, information and services to its investors for marketing, trading, administration, service and other purposes or otherwise as permitted or required by law.

Chesapeake will not disclose non-public personal information about investors to third parties unaffiliated with Chesapeake, except (a) Chesapeake will share that information with third party service providers with a need to know the information to enable them to provide professional services to Chesapeake, thus enabling Chesapeake to provide statements, information and services to its investors for marketing, trading, administration, service and related purposes; (b) Chesapeake may share that information with non-affiliated third parties acting in a fiduciary or representative capacity on the investor's behalf, such as an IRA custodian or Trustee of a grantor trust or to government agencies and self-regulatory agencies in order to respond to or comply with a subpoena or court order, judicial process or a request or requirement of regulatory authorities; and (c) Chesapeake may share information with non-affiliated third parties as otherwise permitted or required by law.

Chesapeake will send to its clients and investors notice of its Privacy Policies annually and whenever those Policies change, as required by law. If an investor ceases to be a client of Chesapeake, Chesapeake will continue to follow its Privacy Policies and practices with respect to that former client's non-public personal information, but a former client will not receive future notices from Chesapeake. Chesapeake reserves the right to modify or supplement its Privacy Policies at any time, and to apply changes to information previously collected, as permitted by law.