



# Saba | Capital

## GENERAL PRIVACY NOTICE

**Effective Date:** June 2024

**Last Updated:** June 2026

### Introduction

This notice (the “General Privacy Notice”) is provided by Saba Capital Management, L.P. (the “Investment Manager,” “we,” “us,” or “our”) to describe how we collect, use, disclose, and otherwise process the Personal Information (as defined below) we collect through online and offline interactions, including on our website at <https://www.sabacapital.com/>, and the rights you may have with respect to that Personal Information.

This General Privacy Notice does not apply to information that we collect in the context of providing financial services, such as investment advice, which is instead described in our Investor Privacy Notice. Please contact us at [dataprotection@sabacapital.com](mailto:dataprotection@sabacapital.com) to request a copy.

Consumers with disabilities may access this General Privacy Notice by (a) visiting our website to download or (b) contacting (212) 542-4635 or [dataprotection@sabacapital.com](mailto:dataprotection@sabacapital.com) and requesting a copy of this General Privacy Notice in a .pdf format that is compatible with character recognition software and that can be printed.

If you are a California resident, please refer to the section titled “**Supplemental Information for California Residents**” below. If you are located in the UK, please refer to the section titled “**Supplemental Information for the UK**” below.

### Personal Information We Collect

In the past 12 months, we have collected and disclosed for a business purpose the following categories of personal information (“Personal Information”):

Category	Examples	Collected	Disclosed for Business Purpose
Identifiers	A real name, alias, email address, postal address, Internet Protocol (IP) address, account name, Social Security number, driver’s license number, passport number, or other similar personal identifiers.	Yes	Yes

Category	Examples	Collected	Disclosed for Business Purpose
Records about you	A signature, physical characteristics or description, telephone number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	Yes	Yes
Protected classification characteristics under state or federal law	Age (40 years or older), race, citizenship, marital status, sex, veteran or military status.	Yes	Yes
Commercial information	Account activity, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	Yes	Yes
Biometric information	Fingerprints, faceprints, voiceprints, and iris or retina scans.	No	No
Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	Yes	Yes
Geolocation data	Physical location or movements.	Yes	No
Sensory data	Recordings of audio, electronic, visual, thermal, olfactory, or similar information including transcriptions of such recordings.	Yes	Yes
Professional or employment-related information	Current or past job history or performance evaluations.	Yes	Yes
Non-public education information (per the Family Educational Rights and Privacy Act)	Education records directly related to a student maintained by an educational institution or party acting on its behalf.	Yes	Yes
Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	No	No

Category	Examples	Collected	Disclosed for Business Purpose
Sensitive personal information	A consumer's SS, driver's license, state ID card, or passport number; account log-in or debit/credit card number in combination with any access code, password, or account credentials; precise geolocation; racial/ethnic origin, religious/philosophical beliefs, criminal convictions, or union membership; contents of mail, email, and text messages; genetic data; biometric information; health information; or sex life or sexual orientation.	Yes	Yes

**Purpose for Collection and Use of Personal Information**

We may collect or use Personal Information for one or more of the following purposes

- (i) Providing you with information about our products and services;
- (ii) Providing you with performance and other updates;
- (iii) One or more of the following business purposes:
  - a. Performing services (for us or our service provider or contractor) such as account servicing, processing orders and payments, and analytics;
  - b. Legal compliance;
  - c. Detecting and protecting against security incidents, fraud, and illegal activity;
  - d. Internal research for technological improvement;
  - e. Internal operations;
  - f. Activities to maintain and improve our services; and
  - g. Short-term, transient use, such that the Personal Information is not disclosed to another third party and is not used to build a profile about you; and
- (iv) Other commercial purposes, including, but not limited to, activities that are directed to advancing commercial or economic interests, such as inducing a person to buy, rent, lease, join, subscribe to, provide or exchange products or services, or enabling or effecting a commercial transaction.

**We Collect this Personal Information from the Following Sources**

- (i) Directly from you when you provide it to us, such as when you contact us via form, email, or phone, or otherwise use our website.

- (ii) From third parties such as when you contact the Investment Manager's service providers via form, email, or phone, or otherwise use their websites.
- (iii) Automatically as you navigate through the website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.

### **Disclosing Personal Information**

We may disclose Personal Information to:

- (i) Service providers, including, but not limited to: administrators, lenders, banks, trading counterparties, brokers, auditors, law firms, consultants, placement agents, employment agencies and recruiters, credit bureaus, and background check providers;
- (ii) Affiliates;
- (iii) Business partners;
- (iv) Legal or government regulatory authorities as required by applicable law;
- (v) In connection with a potential business transfer or merger; and
- (vi) Third parties to whom you or your agents authorize us to disclose such information in connection with services we provide to you.

### **Data Security and Retention of Personal Information**

Although we maintain reasonable security safeguards, no security measures or communications over the Internet can be 100% secure, and we cannot guarantee the security of your information.

We retain Personal Information for as long as necessary to provide the services and fulfill the transactions you have requested, or for other business purposes such as complying with our legal or regulatory obligations, resolving disputes, and enforcing our agreements. We decide how long we need Personal Information on a case-by-case basis. We may consider the following factors when making retention decisions:

- (i) Whether we need to keep some of your Personal Information to maintain your account;
- (ii) Whether we are required by law to keep some types of Personal Information for certain periods of time to comply with our legal obligations; and
- (iii) Whether we need some of your Personal Information for other business purposes, such as to prevent harm and ensure safety and security of our website and services; investigate possible violations of our terms and conditions of use; or otherwise protect ourselves.

If we determine your Personal Information is no longer necessary using the factors above, we will generally destroy or anonymize that information. To the extent that we de-identify information, we will not attempt to re-identify it except in compliance with applicable law.

## **We Combine Information**

We may combine information that we have collected offline with information we collect online. We combine information that we have collected across other third party sites. We combine information across devices, such as computers and mobile devices. We may also combine information we get from a third party with information we already have.

## **Revisions to Our Privacy Policies**

We may update this General Privacy Notice from time to time without additional notice to you. Any changes we may make to this General Privacy Notice in the future will be posted on this page. We therefore suggest that you review this General Privacy Notice periodically, which is available at <https://sabacapital.s3.us-west-1.amazonaws.com/General+Privacy+Notice+Saba+Capital.pdf>.

## **Third-Party Websites**

The Investment Manager's and Clients' websites may contain hyperlinks to websites operated by third parties, which may include news articles, podcasts, and/or social media features, such as social media buttons or links. We provide such hyperlinks for your reference and convenience only. We do not control such websites and are not responsible for their content or the privacy or other practices of such websites. It is up to you to read and fully understand their privacy policies. Our inclusion of hyperlinks to such websites does not imply any endorsement of the material on such websites or any association with their operators.

## **Questions**

If you have questions regarding this General Privacy Notice, please contact us at (212) 542-4635 or [dataprotection@sabacapital.com](mailto:dataprotection@sabacapital.com).

## Supplemental Information for California Residents

The following terms supplement the above disclosures with respect to our processing of Personal Information about California residents.

This General Privacy Notice describes our Personal Information collection, use, and disclosure practices over the past 12 months. The use of sensitive personal information is limited to only those purposes authorized under the California Consumer Privacy Act (“CCPA”). We do not knowingly sell or share with third parties (for cross-context behavioral advertising) Personal Information, including from anyone under the age of 16.

### Rights of California Consumers

As a California consumer, you may have the following rights, subject to certain exceptions and limitations:

- (i) The right to request: (a) the categories and specific pieces of Personal Information we collect, use, disclose, and/or sell about you; (b) the categories of sources from which we collect your Personal Information; (c) our business or commercial purposes for collecting, selling or sharing your Personal Information; and (d) the categories of Personal Information disclosed for a business purpose, sold, or shared with third parties (for cross-context behavioral advertising) and the categories of persons to whom it was disclosed, sold, or shared (and with respect to Personal Information that is sold or shared, organized by category or categories of Personal Information for each category of third parties to whom the Personal Information was sold or shared).
- (ii) The right to request that we delete your Personal Information, subject to certain exceptions.
- (iii) The right to opt out of our sale(s) (if any) of your Personal Information to third parties or sharing with such third parties for the purpose of cross-context behavioral advertising.
- (iv) The right to request we correct any inaccurate Personal Information maintained about you.
- (v) The right not be retaliated or discriminated against for exercising your CCPA rights.

You may submit requests relating to your exercise of CCPA rights to us via:

Phone: (212) 542-4635;

or

Email: [dataprotection@sabacapital.com](mailto:dataprotection@sabacapital.com).

You may only make a verifiable request for access twice within a 12-month period. All verifiable requests must provide (1) enough information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized agent and (2) sufficient detail that allows us to properly evaluate and respond to it. We may need to request additional information from you to verify your identity or understand the scope of your request. In verifying requests, we will require you to provide, at a minimum, your mailing address and telephone number to verify your identity. If we are unable to verify your identity, we will need to deny your request.

You may designate an authorized agent to make a CCPA request on your behalf and we reserve the right to seek proof that you have given the authorized agent signed permission to act on your behalf.

You may also exercise your right to opt out through a browser setting or extension to communicate your preference to automatically opt out of selling and sharing of your Personal Information. We honor your right to opt out of the sale and sharing of your Personal Information as signaled by a universal opt-out signal or Global Privacy Control (“GPC”). To enable GPC, you can visit the Global Privacy Control page at <https://globalprivacycontrol.org>. If you download a supported browser or extension and exercise your privacy rights with GPC, we will turn off certain third-party cookies on the applicable site after the site detects a GPC signal.

### **Shine the Light**

California residents may request that we provide certain information regarding our disclosure of your personal information to third parties for their direct marketing purposes. You can opt out of these disclosures by emailing [dataprotection@sabacapital.com](mailto:dataprotection@sabacapital.com) with the subject line “CA Shine the Light”.

## Supplemental Information for the UK

The following terms supplement the above disclosures with respect to our processing of UK Personal Information only.

### Data Controller

Unless otherwise specified, the Investment Manager is responsible for the processing of your Personal Information as the controller.

**Legal Bases for Processing:** We process personal data in reliance on the following legal bases:

Processing Purposes	Legal Bases
To deliver our services	<ul style="list-style-type: none"><li>• Performance of a contract to which you are a party or to take steps at your request prior to entering a contract.</li><li>• Legitimate interests as set out in the “Purpose for Collection and Use of Personal Information” section above.</li><li>• Your consent, when appropriate.</li></ul>
For recruiting, position advertising, talent management, and employment purposes	<ul style="list-style-type: none"><li>• Performance of a contract to which you are a party or to take steps at your request prior to entering a contract.</li><li>• Legitimate interests as set out in the “Purpose for Collection and Use of Personal Information” section above.</li><li>• Compliance with a legal or statutory obligation to which we are subject.</li><li>• Your consent, when appropriate.</li></ul>
To market to you and send you information	<ul style="list-style-type: none"><li>• Legitimate interests as set out in the “Purpose for Collection and Use of Personal Information” section above.</li><li>• Your consent, when appropriate.</li></ul>
To contact you when necessary	<ul style="list-style-type: none"><li>• Legitimate interests as set out in the “Purpose for Collection and Use of Personal Information” section above.</li><li>• Compliance with a legal or statutory obligation to which we are subject.</li><li>• Your consent, when appropriate.</li></ul>
For our internal business purposes	<ul style="list-style-type: none"><li>• Performance of a contract to which you are a party or to take steps at your request prior to entering a contract.</li><li>• Compliance with a legal or statutory obligation to which we are subject.</li><li>• Legitimate interests as set out in the “Purpose for Collection and Use of Personal Information” section above.</li><li>• Your consent, when appropriate.</li></ul>
For our internal research and improvement purposes	<ul style="list-style-type: none"><li>• Legitimate interests as set out in the “Purpose for Collection and Use of Personal Information” section above.</li><li>• Your consent, when appropriate.</li></ul>
To protect the security or integrity of our business	<ul style="list-style-type: none"><li>• Performance of a contract to which you are a party or to take steps at your request prior to entering a contract.</li><li>• Compliance with a legal or statutory obligation to which we are subject.</li></ul>

	<ul style="list-style-type: none"> <li>• Legitimate interests as set out in the “Purpose for Collection and Use of Personal Information” section above.</li> <li>• Establishment, exercise, or defense of legal claims.</li> <li>• Protection of vital interests.</li> <li>• Your consent, when appropriate.</li> </ul>
For legal reasons	<ul style="list-style-type: none"> <li>• Performance of a contract to which you are a party or to take steps at your request prior to entering a contract.</li> <li>• Compliance with a legal or statutory obligation to which we are subject.</li> <li>• Legitimate interests as set out in the “Purpose for Collection and Use of Personal Information” section above.</li> <li>• Establishment, exercise, or defense of legal claims.</li> <li>• Protection of vital interests.</li> <li>• Your consent, when appropriate.</li> </ul>
In connection with a corporate transaction	<ul style="list-style-type: none"> <li>• Legitimate interests as set out in “Purpose for Collection and Use of Personal Information” section above.</li> </ul>

**Your Data Protection Rights:** You may exercise certain rights regarding your Personal Information.

- (i) *Access:* confirm with us whether your personal data is processed, and if it is, to request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to receive confirmation regarding how and why we process your personal data;
- (ii) *Rectification:* request correction/rectification of the personal data that we hold about you. This enables you to have incomplete or inaccurate information we hold about you corrected.
- (iii) *Erasure:* request erasure of your personal data in certain circumstances (the “right to be forgotten”).
- (iv) *Objection:* object to processing of your personal data, on grounds relating to your particular situation, where we are relying on a legitimate interest (or those of a third party). However, we may be permitted to continue to process your personal data where we have a compelling legitimate grounds for the processing. You also have the right to object where we are processing your personal data for direct marketing purposes.
- (v) *Restriction:* request the restriction of processing of your personal data in certain circumstances. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- (vi) *Portability:* in certain circumstances, request to receive personal data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format.
- (vii) *Withdrawal:* You have the right to withdraw your consent when it has been obtained, without this withdrawal affecting the lawfulness of the personal information processing operations previously carried out.

Please note that the right to be forgotten that applies in certain circumstances under GDPR is not likely to be available in respect of the personal data we hold, given the purpose for which we collect such data, as described above. Please contact (212) 542-4635 or [dataprotection@sabacapital.com](mailto:dataprotection@sabacapital.com) if you wish to exercise these rights.

You may exercise these rights by contacting us via:

*Phone:* (212) 542-4635;

or

*Email:* [dataprotection@sabacapital.com](mailto:dataprotection@sabacapital.com).

If you are not satisfied with our response, you have the right to lodge a complaint with a supervisory authority in the country where you reside or where the conduct that is the subject of the complaint occurred. You can also lodge a complaint with us using the information above if UK laws apply to you and you think we have infringed our UK data protection obligations when handling your personal data.

### **International Transfers of Personal Information**

Due to the global nature of our operations, some of the recipients mentioned in the “Disclosing Personal Information” section of this General Privacy Notice may be in countries outside the UK that do not provide an adequate level of data protection as defined by data protection laws in the UK. Transfers within our corporate group or to third parties located in third countries that have not received such recognition take place using an acceptable data transfer mechanism, such as the UK Standard Contractual Clauses. Please contact us if you want to receive further information about how we transfer Personal Information or, where available, a copy of the relevant data transfer mechanism.