



Rev. June 2015

<b>FACTS</b>		<b>WHAT DOES GEMINI FUND SERVICES, LLC ("GEMINI") DO WITH YOUR PERSONAL INFORMATION?</b>	
<b>Why?</b>	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. Please read this notice carefully to understand what we do.		
<b>What?</b>	<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"> <li>• Social Security number</li> <li>• Employment information</li> <li>• Account balances</li> <li>• Account transactions</li> <li>• Income</li> <li>• Investment experience</li> </ul> <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>		
<b>How?</b>	All financial companies need to share a customer's personal information to run their everyday business - to process transactions, maintain customer accounts, and report to credit bureaus. In the section below, we list the reasons financial companies can share their customer's personal information; the reasons Gemini chooses to share; and whether you can limit this sharing.		
Reasons we can share your personal information		Does Gemini 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		Yes	No
For our affiliates' everyday business purposes -- information about your transactions and experiences		Yes	No
For our affiliates' everyday business purposes -- information about your creditworthiness		No	We don't share
For nonaffiliates to market to you		No	We don't share
<b>Questions?</b>	Call (631) 470-2600 or go to <a href="http://www.geminifund.com">www.geminifund.com</a>		

Who we are

**Who is providing this notice?**

Gemini Fund Services, LLC

What we do

**How does Gemini protect my personal information?**

To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.

**How does Gemini collect my personal information?**

We collect your personal information, for example, when you

- open an account
- give us your income information
- provide employment information
- provide account information
- give us your contact information

We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.

**Why can't I limit all sharing?**

Federal law gives you the right to limit only

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing.

Definitions

**Affiliates**

Companies related by common ownership or control. They can be financial and nonfinancial companies.

*Affiliates of Gemini include:*

- *CLS Investments, LLC*
- *NorthStar Financial Services Group, LLC*
- *Blu Giant, LLC*
- *Gemini Alternative Funds, LLC*
- *Gemini Hedge Fund Services, LLC*
- *Northern Lights Compliance Services, LLC*
- *Northern Lights Distributors, LLC*
- *Orion Advisor Services, LLC*
- *Constellation Trust Company*
- *NorthStar Topco, LLC*
- *NorthStar CTC Holdings, Inc.*

**Nonaffiliates**

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

- *Gemini does not share with nonaffiliates so they can market to you.*

**Joint marketing**

A formal agreement between nonaffiliated financial companies that together market financial products and services to you.

- *Our joint marketing partners include other financial service companies.*