

PRIVACY NOTICE
MANZIL INVESTMENT ADVISORS, LLC

Phone: (425) 600-2991
Website: <https://manzil.us>

January 2025

Investment advisers are required by federal law to adopt written policies and procedures that address administrative, technical, and physical safeguards for the protection of client records and the proper disposal of such information. Furthermore, investment advisers are required to inform their clients of these specific policies regarding privacy of information. Manzil Investment Advisors, LLC (“Manzil Invest” the “Company” or “Firm”) appreciates the trust our clients place in us, and we recognize the importance of protecting the confidentiality of non-public personal information that we collect from them through our business relationships. The information is used to ensure accuracy in reporting and record keeping, to perform our regular course of business, and to comply with the law and our regulators.

Keeping this information secure is a top priority for us, and we are pleased to share with you our Privacy Policy:

1. We collect non-public personal information about our clients from the following sources:
 - a. Applications (e.g., due diligence questionnaires, investor forms, account applications)
 - b. Investment Management Agreement
 - c. Custodian Agreement
 - d. Other forms, correspondence, and communications
2. The information we collect can include:
 - a. Name, address, social security number, and date of birth
 - b. Assets, income, accredited investor status, and investment objectives
 - c. Transactions and investments with us (account values, transactions, etc.)
 - d. Other information useful to our services
3. We maintain administrative, physical and electronic safeguards to protect non-public personal information.
4. We may disclose non-public personal information about our clients and former clients to employees, independent contractors, or other third parties with whom we have contracted to perform services on our behalf, such as brokerage, legal, accounting, compliance, and data processing services, as well as in order to comply with legal and regulatory requests made to us, and to assist with law enforcement, investigations, complaints, regulatory requests, litigation, arbitration, mediation, and other legal processes.
5. Note that our Privacy Policy includes no right to disseminate non-public personal information about our clients and former clients to any external or third party for marketing or other purposes not directly related to servicing your investor account.
6. We may disclose non-public personal information about our clients and former clients as required by federal, state, or local law. Please note, every investor of each private fund has the right to direct Manzil Invest to not disclose the non-public personal information about that investor to a non-affiliated third party. If an investor would like to exercise its right to ‘opt out’ of Manzil Invest’s privacy policy, such an investor should provide a written statement exercising that right. This right to opt out may be exercised at any time and will remain in effect until written notice revoking said right is received by Manzil Invest from the investor. However, in the event Manzil Invest encounters circumstances where it is compelled by law to disclose non-public personal information, Manzil Invest must provide the information even if the investor has exercised its right to opt out.

Other Important Information:

7. For California residents: We will not share information we collect about you with nonaffiliated third parties, except as permitted by law. We will not share information about your creditworthiness with our affiliates, as applicable, other than as permitted by California law, unless you authorize us to make those disclosures.
8. For Nevada clients: Section 340 of the Nevada Privacy Law requires that an operator post a privacy policy, which is called a “notice” in Nevada. We are providing you with this notice pursuant to state law. We will not share information we collect about you with nonaffiliated third parties, except as permitted by law. We will not share information about your creditworthiness with our affiliates, as applicable, other than as permitted by Nevada law, unless you authorize us to make those disclosures.
9. For Vermont residents: We will not share information we collect about you with nonaffiliated third parties, except as permitted by law, including, for example with your consent or to service your account. We will not share information about your creditworthiness with our affiliates, other than as permitted by Vermont law, unless you authorize us to make those disclosures.

Manzil Investment Advisors, LLC, a Delaware limited liability company, is an investment adviser registered with the SEC pursuant to the Advisers Act. The Company has been registered with the SEC since May 14, 2020. In November 2024, the Firm (formerly Aghaz Investment Advisors, LLC) was acquired by a Canadian based entity, Murabaha Inc. (d/b/a Manzil), through Manzil Inc. (“Manzil”), a U.S., Delaware based company and a wholly owned subsidiary of Murabaha. Manzil Invest operates as a U.S. based affiliate of Manzil. The Company’s principal office is based in Dallas, Texas. It has an additional office location (parent company) in Toronto, Canada. The Company’s executive officers and control persons are also disclosed in Form ADV Part 1A. The Firm is committed to safeguarding the confidential information of our clients. Furthermore, the Company is keenly aware that cybersecurity and privacy breaches may occur as a result of security failures at third parties that have access to the Company’s systems. To minimize the risk of such events, the Company has adopted the policies and procedures. The Chief Compliance Officer of Manzil Invest shall ensure that any breach, misappropriation or loss of such information is immediately reported to the individual(s) whose information was compromised and any applicable state or federal regulatory or law enforcement agencies. In addition, we intend to notify clients of any material breaches that might put your personal financial data at risk. We will provide notice of changes in our information sharing practices.

We want to hear from you if you have questions.

Mr. Khurram Agha
Chief Compliance Officer
(425) 600-2991