



## SILVER ROCK CAPITAL PARTNERS

## PRIVACY NOTICE

### WHAT DOES SILVER ROCK CAPITAL PARTNERS LP AND/OR ITS AFFILIATES ("SRCP") DO WITH YOUR PERSONAL INFORMATION?

SRCP provides investment advisory, portfolio management and other financial services, including through the operation and management of private funds and other collective investment vehicles, as well as investment analysis and trading in financial instruments. Financial companies like SRCP 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.

### INFORMATION SRCP COLLECTS:

The types of personal information we collect and share depend on the product, service or relationship you have with us. For our fund and advisory clients, this information can include:

- Residence, domicile and/or place of birth or business
- Date of birth and/or registration
- Social security number or other tax identification information
- Account balances
- Investment experience and education
- Income and sources of funds
- Wire transfer instructions and other related banking information
- Transaction history
- Beneficial ownership
- Signature specimen
- Government-issued photo identification, documents, and numbers

### HOW SRCP COLLECTS INFORMATION:

SRCP needs to share customers' personal information to run its everyday business in providing investment advisory, portfolio management and other financial services. We also collect personal information from others, such as third-party service providers, issuers and borrowers of portfolio investments, as well as their related persons. In the section below, we list the reasons financial companies like SRCP can share their customers' personal information; the reasons SRCP chooses to share; and whether you can limit this sharing.

REASONS WE CAN SHARE YOUR PERSONAL INFORMATION	DOES SRCP SHARE?	CAN YOU LIMIT THIS SHARING?
<b>For our everyday business purposes</b> - such as to process your transactions, maintain your accounts(s) or respond to court orders and legal investigations.	YES	NO
<b>For our marketing purposes</b> - to offer our products and services to you	NO	WE DON'T SHARE
<b>For joint marketing with other financial companies</b>	NO	WE DON'T SHARE
<b>For our affiliates' everyday business purposes</b> – information about your transactions and experiences	YES	NO
<b>For our affiliates' everyday business purposes</b> – information about your creditworthiness	NO	WE DON'T SHARE
<b>For non-affiliates to market to you</b>	NO	WE DON'T SHARE

### QUESTIONS?

Contact Saish Setty, SRCP's Chief Compliance Officer, at [legal@sr-capitalpartners.com](mailto:legal@sr-capitalpartners.com) or +1 (929) 512-4354



# PRIVACY NOTICE *(Continued)*

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## WHO IS SRCP

### Who is providing this notice?

Silver Rock Capital Partners LP and its affiliates

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## WHAT SRCP DOES

### How does SRCP 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 technological safeguards and secured files and buildings.

### How does SRCP collect my personal information?

We collect your personal information, for example, when you:

- Enter into an investment advisory contract or subscription
- Give us your contact information
- Make deposits or withdrawals from your account
- Tell us where to send money or make a wire transfer
- Seek advice about your investments with us

We also collect your personal information from others, such as third-party service providers, agents, and professional advisors.

### 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 non-affiliates to market to you

Certain states and other jurisdictions and individual companies may give you additional rights to limit sharing (see addendums).

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## DEFINITIONS

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

**Non-Affiliates:** Companies not related by common ownership or control. They can be financial and nonfinancial companies. *SRCP does not share with non-affiliates so they can market to you.*

**Joint Marketing:** A formal agreement between non-affiliated financial companies that together market financial products or services to you. *SRCP does not jointly market.*

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## FOR CALIFORNIA RESIDENTS

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To request more information, please call +1 (929) 512-4354 or email [legal@sr-capitalpartners.com](mailto:legal@sr-capitalpartners.com).

## PRIVACY ADDENDUM FOR CALIFORNIA RESIDENTS

This addendum supplements the information contained in the Privacy Notice of Silver Rock Capital Partners LP (together with its affiliates, "SRCP", "we," "us," or "our") and applies to any current, prospective or former investor, service provider or employee, as applicable, who is a natural person residing in the State of California ("consumers" or "you"). We adopt this addendum to comply with the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 ("CCPA"). Any terms defined in CCPA, as applicable, have the same meaning when used in this addendum. When you engage with us, you acknowledge that you have read and understand the contents of this addendum.

### Type of Personal and Sensitive Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a consumer, household or device ("personal information"). Personal information does not include publicly available information from government records, de-identified or aggregated consumer information or information excluded from CCPA's scope, such as personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FRCA) or the Gramm-Leach-Bliley Act (GLBA).



# PRIVACY NOTICE *(Continued)*

We have collected the following categories of personal or sensitive information from consumers within the last twelve months:

CATEGORY	EXAMPLE <sup>1</sup>	COLLECTED <sup>2</sup>
<b>A. Identifiers.</b>	Name, alias, postal address, IP address, email address, account name, Social Security number, driver's license number, passport number, or other similar identifiers.	YES
<b>B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</b>	Name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number or any other financial information, medical information, or health insurance information.	YES
<b>C. Protected classification characteristics under California or federal law.</b>	Age, race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information (including familial genetic information).	YES
<b>D. Commercial information.</b>	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	NO
<b>E. Biometric information.</b>	Genetic, physiological, behavioral, and biological characteristics, or activity patterns used to extract a template or other identifier or identifying information, such as, fingerprints, faceprints, and voiceprints, iris or retina scans, keystroke, gait, or other physical patterns, and sleep, health, or exercise data.	NO
<b>F. Internet or other similar network activity.</b>	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	NO
<b>G. Geolocation data.</b>	Physical location or movements.	NO
<b>H. Sensory data.</b>	Audio, electronic, visual, thermal, olfactory, or similar information.	NO
<b>I. Professional or employment-related information.</b>	Current or past job history or performance evaluations.	YES
<b>J. Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).</b>	Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	YES
<b>K. Inferences drawn from other personal information.</b>	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO
<b>L. Complete account credentials</b>	Username, account numbers, or card numbers combined with required access/security code or password	YES
<b>M. Other categories of sensitive information not listed above</b>	Religious or philosophical beliefs, union membership, genetic data, unique identifying biometric information, health, sex life, or sexual orientation information, mail, email, or text messages contents not directed to us	NO

<sup>1</sup> These are non-exhaustive examples for illustrative purposes only, and some information may overlap multiple categories. SRCP does not collect more information than is needed to conduct its business and satisfy any associated regulatory requirements.

<sup>2</sup> The categories of data collected by SRCP vary based on your relationship to SRCP (e.g., SRCP collects non-public education information about job applicants and employees but does not collect such information from investors).



# PRIVACY NOTICE *(Continued)*

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For employees, we may collect additional information, such as the personal information of your spouse and dependents, in order to administer health, retirement and other benefit programs.

## **How We Collect Personal and Sensitive Information**

We obtain information directly or indirectly from you or your agents and from third parties that interact with us in connection with services we perform. How we collect information varies depending on our relationship to you, but examples include: during the onboarding process of a client, vendor or employee relationship; in connection with transactions or potential transactions with you; and during our normal course of business. Third parties or other sources include our affiliate(s), professional employer organization, fund administrator or sub-administrator(s), publicly accessible databases or registers, tax authorities, governmental agencies and supervisory authorities, credit agencies, fraud prevention and detection agencies, or other publicly accessible sources, such as the Internet.

## **Use of Personal and Sensitive Information**

We may use or disclose your information for a variety of purposes, including but not limited to, the following:

- For our everyday business purposes to administer, facilitate and manage your relationship and/or account with SRCP or to otherwise provide you with information, products or services that you request from us.
- To contact you or your authorized representative(s) in connection with your relationship and/or account.
- To monitor and audit compliance with our internal policies and procedures.
- To comply with and enforce applicable contractual, legal and regulatory requirements (including anti-money laundering and similar laws).
- To engage your services and comply with and enforce any contracts entered into between you and us, including for billing and collections (applicable to service providers, vendors, suppliers and business contacts).
- To fill open job positions as part of a recruiting process.
- To administer or facilitate payroll, benefits and other human resources services.
- To provide you with alerts and other notices concerning our products or services that may be of interest to you.

If your relationship with SRCP ends, we will continue to treat your information, to the extent we retain it, as described in this addendum.

## **Retention of Personal and Sensitive Information**

Collected information is retained as required by applicable law, including the Investment Advisers Act of 1940, as may be amended, as required to fulfill our obligations described above or as required to preserve or enforce legal rights and remedies. We will not retain personal or sensitive information for longer than is reasonably necessary for the purposes above.

## **Sharing Personal and Sensitive Information**

We may disclose your information for a business purpose to a third party, who is or will be required to maintain the confidentiality of such information and is or will be prohibited from using your information for purposes other than to carry out the purposes for which we disclose the information. Examples of third parties with whom we may share your information include, but are not limited to:

- Authorized service providers who perform services to facilitate your transactions with SRCP, such as administrators, accountants, auditors, professional advisors, prime brokers, custodians, executing brokers and trading counterparties, customer relationship management, IT consultants, entities assessing our compliance with industry standards, payment processing, email delivery and other similar services.
- Human resources and benefits providers, co-employers or professional employer organizations and other authorized employment-related service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with products or services we provide to you.
- Third parties in the event of any contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business or assets stocks.
- Government or regulatory authorities in order to comply with appropriate laws, regulations and/or requests.

Categories of personal or sensitive information that we share with third parties include Categories A, B, C, I, J and/or L above. The extent to which we share such information varies depending on our relationship with you.

We have not sold any personal or sensitive information in the preceding twelve months. We do not share any personal or sensitive information we collect for cross-context behavioral advertising.



# PRIVACY NOTICE *(Continued)*

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## **Exercising Your CCPA Rights**

CCPA provides consumers with specific rights regarding their personal information. You have the right to request information regarding our collection and use of your personal information no more than twice within a twelve-month period. You also have the right to request that we delete any of your personal information and the right to correct inaccurate personal information that we collected from you and retained, subject to certain exceptions.

For your protection, a request must (a) provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative and (b) describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. SRCP will make a good faith effort to process your request without undue delay and within the timeframe provided by applicable law.

You may submit a request by calling +1 (929) 512-4354 or contacting [legal@sr-capitalpartners.com](mailto:legal@sr-capitalpartners.com).

## **Changes to this Addendum**

We reserve the right to update this addendum at any time to reflect changes in our policies concerning the collection and use of personal information. The revised addendum will be effective immediately upon posting to our web site.

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# PRIVACY ADDENDUM FOR CAYMAN FUNDS

This addendum supplements the information contained in the Privacy Notice of Silver Rock Capital Partners LP and its affiliates (together, “SRCP”), as investment adviser to various investment vehicles domiciled in the Cayman Islands (the “Cayman Funds”). As an investment adviser, SRCP provides investment advisory, portfolio management and other financial services, including through the operation and management of private funds, structured credit and other collective investment vehicles, as well as investment analysis and trading in financial instruments. The purpose of this notice is to provide you with information on our use of your personal data in accordance with the Data Protection Act, 2017 (the “DPL”). In this document, “we”, “us” and “our” refers to the Cayman Funds, SRCP and its or their affiliates and/or delegates.

## **Investor Data**

By virtue of making an investment in the Cayman Funds and your associated interactions with us (including any capital commitment and/or capital contribution (whether past, present or future), including the recording of electronic communications where applicable) or by virtue of you otherwise providing us with personal information on individuals connected with you as an investor (for example, directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners or agents), you will provide us with certain personal information which constitutes personal data within the meaning of the DPL (“Investor Data”). We may also obtain Investor Data from other public sources and third-party service providers, agents, and professional advisors. Investor Data includes, without limitation, the following information relating to you and/or any individuals connected with you as an investor: name, residential address, email address, contact details, corporate contact information, signature, nationality, place of birth, date of birth, tax identification, credit history, correspondence records, passport number and other government-issued identifications, investment experience and education, bank account details, source of funds details and details relating to your investment activity.

In our use of Investor Data, the Cayman Funds will be characterized as a “data controller” for purposes of the DPL. The Cayman Funds’ affiliates and delegates may act as “data processors” for purposes of the DPL.

## **Who This Affects**

If you are a natural person, this will affect you directly. If you are a corporate investor (including, for these purposes, legal arrangements such as trusts or exempted limited partnerships) that provides us with Investor Data on individuals connected to you for any reason in relation to your investment with us, this will be relevant for those individuals and you should transmit this document to such individuals or otherwise advise them of its content.

## **How We May Use Your Personal Data**

The Cayman Funds, as the data controller, may collect, store and use Investor Data for lawful purposes, including, in particular:

- (i) where this is necessary for the performance of our rights and obligations under the subscription agreements, side letters and/or the constitutional and operational documents of the Cayman Funds;
- (ii) where this is necessary for compliance with a legal and regulatory obligation to which the Cayman Funds are subject (such as compliance with anti-money laundering and FATCA/CRS requirements); and/or
- (iii) where this is necessary for the purposes of our legitimate interests and such interests are not overridden by your interests, fundamental rights or freedoms.



# PRIVACY NOTICE *(Continued)*

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## PRIVACY ADDENDUM FOR CAYMAN FUNDS *(Continued)*

Additionally, Citco Fund Administration (Cayman Islands) Limited (the “Administrator”), may use Investor Data, for example to provide its services to the Cayman Funds or to discharge the legal or regulatory requirements that apply directly to it or in respect of which the Cayman Funds rely upon the Administrator, but such use of Investor Data by the Administrator will be compatible with at least one of the aforementioned purposes for which we process Investor Data. Further explanation regarding how the Administrator may handle Investor Data is set out in its privacy notice, which is available at [www.citco.com/footer/privacy](http://www.citco.com/footer/privacy).

Should we wish to use Investor Data for other specific purposes (including, if applicable, any purpose that requires your consent), we will contact you.

### **Why We May Transfer Your Personal Data**

In certain circumstances we and/or our authorized affiliates or delegates may be legally obliged to share Investor Data and other information with respect to your interest in the Cayman Funds with the relevant regulatory authorities such as the Cayman Islands Monetary Authority or the Tax Information Authority. They, in turn, may exchange this information with foreign authorities, including tax authorities.

We anticipate disclosing Investor Data to parties who provide services to the Cayman Funds and their respective affiliates (which may include certain entities located outside the Cayman Islands). Such parties, including those named in the Cayman Funds’ respective offering memoranda, may either process personal data on our behalf or for their own lawful purposes in connection with services provided to the Cayman Funds.

### **The Data Protection Measures We Take**

Any transfer of Investor Data by us or our duly authorized affiliates and/or delegates outside of the Cayman Islands shall be in accordance with the requirements of the DPL. We and our duly authorized affiliates and/or delegates shall apply appropriate technical and organizational information security measures designed to protect against unauthorized or unlawful processing of Investor Data, and against accidental loss or destruction of, or damage to, Investor Data.

We shall notify you of any Investor Data breach that is reasonably likely to result in a risk to the interests, fundamental rights or freedoms of either you or those data subjects to whom the relevant Investor Data relates.

### **Getting In Touch**

Should you have any queries or wish to discuss your data protection rights with us, please contact Saish Setty, SRCP’s Chief Compliance Officer, at [legal@sr-capitalpartners.com](mailto:legal@sr-capitalpartners.com) or +1 (929) 512-4354.