

## Privacy & Cookies Policy

Muzinich & Co. and its affiliates ("we", "us", "our" or "Muzinich") are committed to protecting the privacy of third parties (including its clients and all visitors to the websites [www.muzinich.com](http://www.muzinich.com), [www.muzinichprivatedebt.com](http://www.muzinichprivatedebt.com) and [www.muzinichusfunds.com](http://www.muzinichusfunds.com) (each a "Website")). Please read the following Privacy and Cookies Policy which explains how we use and protect your information.

We will only use information from which you can be identified, such as your name, contact details and ID data ("Personal Information") which is provided to us, or otherwise obtained by us, as set out in this Policy. We will ensure that your Personal Information is handled in accordance with the applicable "Data Protection Legislation", including (i) the UK Data Protection Act 1998, (ii) from 25 May 2018, the EU General Data Protection Regulation (which will replace the Data Protection Act 1998), (iii) the Privacy and Electronic Communications (EC Directive) Regulations 2003 and (iv) all similar or related legislation relating to the processing of Personal Information and/or privacy applicable in any jurisdiction to which Muzinich has been, is or will be subject as in force at the date hereof or as re-enacted, applied, amended, superseded, repealed or consolidated (and in each case including any legally binding regulations, direction, and orders issued from time to time under or in connection with any such law).

By visiting and/or contacting us through the Website (or otherwise engaging with us), you acknowledge that we may collect, use and transfer your Personal Information as set out in this Policy. Muzinich reserves the right to change this Policy from time to time and you should therefore check the Website frequently to ensure that you are happy with any changes.

In this Policy, "Muzinich", "we", "us" and "our", refers to the following entities and their affiliates (and applicable collective investment schemes sponsored by us): (a) Muzinich & Co. Limited, registered in the United Kingdom with registered office 8 Hanover Street, London, W1S 1YQ, company registration number 03852444; (b) Muzinich & Co., Inc. registered in the United States of America with registered office 450 Park Avenue, New York, NY 10022; (c) Muzinich & Co. (Ireland) Limited registered in Ireland with registered office 32 Molesworth Street, Dublin 2.

"You" refers to individuals who may be current, prospective or former (i) individual investors, their immediate family members or close associates, (ii) individual intermediaries (e.g. financial advisors) and (iii) representatives, directors, officers, authorised signatories, employees, service providers, agents and ultimate beneficial owners of (a) entity intermediaries and investors, or (b) Muzinich, as applicable.

For the purposes of the Data Protection Legislation, we are deemed to be the "data controller" in respect of any Personal Information that you provide to us or we otherwise obtain about you.

This Privacy and Cookie Policy covers:

1. Personal Information that we collect from you
2. Personal Information that we receive from other sources
3. What we do with your Personal Information
4. How we share your Personal Information
5. Our security measures and information about when we delete data
6. Transferring Personal Information outside of the EEA
7. How you can access and update your Personal Information

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## 1. Personal Information that we collect from you

When you engage with us (e.g. sending us emails, contacting us via telephone or visiting or making an enquiry through the Website), you may provide Personal Information about yourself including your name and contact details (e.g. your address, email address and telephone number) and your job title and CV where you apply for a role with us. If you consider investing with us, you may also provide us with your financial information and various other necessary Personal Information (e.g. your social security or tax payer identification number, investment history and bank details). Where you make use of our Website or Investor Portal we may also collect information about your use of the Website or Investor Portal (as applicable) (e.g. your IP address and choice of web browser). Some of this Personal Information is collected and processed so we can perform a contract with you, some for the purpose of legal compliance and some for the purposes of our legitimate business interests (namely to carry out and improve our business, analyse the use of our Website and services and support our staff and clients).

We also have CCTV in some of our offices for the purpose of crime prevention and where this is used, we will display appropriate notices. In order to comply with our legal and regulatory obligations, we also record all calls made and received on certain employees' telephone lines.

## 2. Personal Information that we receive from other sources

We may receive information from third parties who collect Personal Information from you and pass it on to us. For example, where we are conducting due diligence on prospective investee companies or decide to invest in third parties we may also receive Personal Information concerning key personnel. Our staff may also give us emergency contact information as part of our emergency scenario planning and may give us details of their dependents and of other people in relation to their employee benefits arrangements. Where this is the case the third party is responsible for obtaining the relevant consents from you to ensure you are happy with the ways in which your Personal Information will be used.

## 3. What we do with your Personal Information

We will only use your Personal Information in order to (a) supply the investment services you have requested and correspond with you, or otherwise perform our contract with you, (b) provide support to you in respect of these services, (c) improve our Website and services, (d) for our internal business processes, including providing support to our staff, (e) comply with legal and regulatory obligations and (f) where relevant, process your application for employment.

Where you have explicitly consented at the time we collected your Personal Information or where we otherwise have a right to do so, we may also use your Personal Information to let you know about our services, job openings, webinars and training that may be of interest to you and/or inform you about important changes or developments to our services, by post, telephone and e-mail.

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From time to time, we may also use your Personal Information to contact you for market research purposes. We may contact you by email, phone or mail, but will not do so if you have informed us that you do not want to receive such communications.

We may also use the Personal Information to customise the Website and Investor Portal according to your interests.

If you change your mind about us using your Personal Information in the ways described in this Policy, please let us know by contacting us at [info@muzinich.com](mailto:info@muzinich.com). You may also opt out of receiving marketing emails from us by following the instructions outlined in the relevant marketing emails.

#### 4. How we share your Personal Information

Where it is necessary for the performance of our contract with you or for our internal business processes, we may share your Personal Information with certain third parties, such as our group fund(s), the group funds' administrator, and our other group companies and our advisors, including screening providers such as World-Check (click [here](#) for World-Check privacy statement). By submitting your Personal Information to us, you acknowledge that such third parties may receive and process your Personal Information. Muzinich asks all third parties to treat your Personal Information securely and in accordance with this Privacy Policy, and will take reasonable steps to enforce this. We will not sell your data.

In addition, it may be necessary to disclose your Personal Information if we are under a duty to disclose your Personal Information in order to comply with any legal or regulatory obligation (such as anti-money laundering obligations), carry out an internal investigation, enforce any agreement, or protect the rights, property, or safety of Muzinich, Muzinich's group companies and our clients, directors, employees or other personnel. This includes exchanging information with other companies and organisations for the purposes of fraud protection and prevention.

We will also share your contact details with third party partners in the event that you have consented to receive marketing from such third parties. If you change your mind about being contacted by these parties in the future, please let us know by contacting us using the details set out at section 11 below or contact the third party directly. You may also opt out of receiving any marketing communications from third parties by following the instructions outlined in these communications.

#### 5. Our security measures and information about when we delete data

We will only keep your Personal Information for as long as we reasonably require and, in any event, only for as long as the Data Protection Legislation allows.

Where you have chosen a password which allows you to access certain parts of the Website, such as our Investor Portal, you are responsible for keeping this password confidential. We advise you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure and, although we will take steps to protect your Personal Information, we cannot guarantee the security of your Personal Information transmitted via the Website; any transmission is therefore at your own risk.

Muzinich & Co.: New York +1 212 888 3413, London +44 (0)207 612 8755, Manchester +44 (0)161 509 1560, Frankfurt +49 (0)69 153 25 70 0, Paris +33 (0)1 7091 6990, Milan +39 02 8342 7300, Madrid +34 91 084 8895, Zurich +41 (0)44 218 14 14, Dublin +353 (0)1 907 3230, Singapore +65 6622 5991

[www.muzinich.com](http://www.muzinich.com)

## 6. Transferring Personal Information outside of the EEA

The Personal Information you provide to us will be transferred to and stored on our servers in London and New York as well as our back up facility in New Jersey. We take steps to protect your Personal Information from unauthorised access and against unlawful processing, accidental loss, destruction and damage.

In processing your Personal Information, it will sometimes be necessary for us to transfer your Personal Information outside the European Economic Area ("EEA") to our staff and our third party service providers. It may also be accessed by staff operating outside the EEA who work for us or for one of our suppliers or group companies. This includes people engaged in, among other things, the provision of support services to us. We will take all steps reasonably necessary to ensure that your Personal Information is treated securely and in accordance with this Policy and the Data Protection Legislation when it is processed in, or otherwise accessed from, a location outside the EEA. This means that we will only transfer your Personal Information to our non-European offices and to third parties based outside the EEA if that party (a) is situated in a country that has been confirmed by the European Commission to provide adequate protection to Personal Information or (b) has agreed (by way of written contract) to provide all protections to your Personal Information as required by the Data Protection Legislation. For the avoidance of doubt, in the event that the UK is no longer a part of the EEA, references in this paragraph to the EEA shall mean the EEA and the UK.

## 7. Accessing and updating your Personal Information

You have the right to ask us not to process your Personal Information for marketing or research purposes. We will usually inform you (before collecting your Personal Information) if we intend to use your Personal Information for such purposes or if we intend to disclose your Personal Information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your Personal Information. You can also exercise the right at any time by contacting us at the details set out at section 11 below.

You have the right to see the Personal Information we hold about you and to ask us to: (a) make any changes to ensure that any Personal Information we hold about you is accurate and up to date; (b) erase or stop processing any Personal Information we hold about you where there is no longer a legal or regulatory ground for us to hold it; or (c) in some cases transfer any information we hold about you to a specified third party. If you wish to do this, please contact us using the contact details set out at section 11 below.

## 8. Complaints

Should you have any queries or complaints in relation to how we use your Personal Information, please contact us using the details set out at section 11 below. Should you wish to take any complaints or queries further, you have the right to contact the Information Commissioner's Office (or equivalent in the EU member state of your habitual residence, place of work or place of the alleged infringement) regarding such issues.

Our Website may, from time to time, contain links to and from third party websites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that

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we do not accept any responsibility or liability for these websites or their related policies. Please check these policies before you submit any Personal Information via these websites.

## 9. Our use of Cookies

A cookie is a small file that is sent to your browser from a web server and is stored on your computer. Cookies help us to analyse web traffic and identify which pages of our Website and Investor Portal are being used. Our Website also uses cookies to respond to you as an individual so that it can tailor its operations to your needs by gathering and remembering information about your preferences as well as enabling you to login to and use our Investor Portal. We may use this information for statistical analysis purposes and then it is removed from our systems.

A cookie in no way gives us access to your computer or any information about you, other than information about how you use the Website and the Personal Information you choose to share with us (including Personal Information you automatically share with us by way of your browser settings).

In particular, we use the following cookies:

- a) **Strictly necessary cookies.** These cookies are essential in order to enable you to move around the Website (and Investor Portal) and use its features, such as accessing secure areas.
- b) **Performance cookies.** These cookies collect information about how visitors use our Website (and Investor Portal), for instance which pages visitors go to most often and if they get error messages from the web pages. These cookies don't collect information that identifies a visitor; all information these cookies collect is aggregated and therefore anonymous. It is only used to improve how our Website (and Investor Portal) works.
- c) **Functionality cookies.** These cookies allow our Website (and Investor Portal) to remember choices you make (such as your user name, language or the region you are in) and provide enhanced, more personal features. These cookies can also be used to remember changes you have made to text size, fonts and other parts of the Website (and Investor Portal) that you can customise. The information these cookies collect is anonymised and they cannot track your browsing activities on other websites.
- d) **Sharing cookies.** These cookies allow you to interact with third party services such as LinkedIn.

You will normally see a message on our Website (or Investor Portal) before we store a cookie on your computer which describes the types of cookies we use and what information they might collect. We may also use banners and pop-ups from time to time to give you options around cookies use.

You can also manage cookie use via your browser settings (this will allow you to refuse the setting of all or some cookies) and your browser provider may ask you to confirm your settings. Note, however, that if you block all cookies (including essential cookies) via your browser settings you may not be able to access all or parts of our Website.

You can find more information about cookies generally here: [www.allaboutcookies.org](http://www.allaboutcookies.org).

Please note that third party providers may also use cookies to assess the ways in which you make use of their websites and we have no control over these.

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## 10. Changes to our Privacy & Cookies Policy

Muzinich may amend this Policy at any time without notice. By continuing to use the Website and/or Investor Portal and making use of our services you agree to the updated Policy. If you do not agree to any changes that we make, you should not use or access (or continue to use or access) the Website, Investor Portal and/or our services. Any changes to this Policy will be posted on the Website.

## 11. Our Contact Information

If you have any questions (including relating to transfers of your Personal Information outside the EEA), please feel free to contact us by email at: [info@muzinich.com](mailto:info@muzinich.com) Alternatively, you may call our team on 0207 612 8755 in London or + 1 212 888 3413 in New York, Monday to Friday: 9am to 5pm.