

# DEER PARK ROAD MANAGEMENT COMPANY

## PRIVACY POLICY

Last Updated: June 30, 2023

This Privacy Policy (“Policy”) is provided by Deer Park Road Management Company, LP (collectively with the funds and accounts sponsored or managed by it, “Company,” “we,” “us,” or “our”). It applies to the collection and use of personal information by the Company when you visit our websites (the “Sites”) or engage with us offline and describes rights you may have with respect to your personal information. By accessing the Sites and our services, you agree to our collection and use of personal information as described in this Policy and to our Terms of Use.

### Notice at Collection: Personal Information We Collect

We collect the following categories of personal information:

- **Contact information and other identifiers** - Name, signature, postal address, email address, phone number, fax number, account name, Social Security number, tax identification number, photographs, copies of identification documents (e.g., passport, driver’s license), names of family members and those associated with an account including authorized signatories, IP address, device IDs and other similar identifiers, account log-in and password information
- **Commercial and financial information** - Records of property, funds, or services purchased, obtained, or considered; other investing or consuming histories or tendencies; information on investments, assets, expenses, accounts, net worth, tax information, holdings, account balances, transaction history, bank statements, credit history, and trust and estate planning documents
- **Internet and other electronic activity information:** device and browser type, browsing and search history on our Sites, and information regarding interaction with our Sites
- **Audio information** – Voicemail recordings
- **Educational information** - degrees or certifications sought and obtained, other qualifications, references, resumes, information on positions held, work performance and work product, and military service history
- **Professional information** – information about job titles and supervisory roles
- **Sensitive personal information** – Social Security number, tax identification number, copies of identification documents (e.g., passport, driver’s license), account log-in and password information

We have collected the same categories of personal information in the 12 months prior to the date of this Policy.

### **Notice at Collection: Purposes for Collection of Personal Information**

With respect to each of the categories of personal information above, we may collect and use the information for the following purposes:

- Administering the relationship between and serving investors and clients
- Business operations, including but not limited to, securing credit or financing; managing administrative and operational matters; administering our service provider, contractor, and vendor relationships and services; auditing; conducting research and analysis; and managing risk
- Marketing our funds and services
- Complying with applicable legal or regulatory requirements and Company policies and contracts, responding to valid legal requests, assessing and investigating compliance
- Monitoring, managing, and securing resources, property, and personnel
- To prevent fraud and for IT security purposes
- Enforcing or defending our rights
- Recruiting, hiring, performance and talent management

### **Notice at Collection: No Sale or Sharing of Personal Information for Behavioral Advertising**

We do not sell personal information and do not share personal information for purposes of cross-context behavioral advertising.

### **Notice at Collection: Retention Periods**

We retain the categories of personal information we collect for the length of time necessary to provide our services and to comply with legal obligations or to protect our legal rights.

### **Sources From Which We Collect Personal Information**

We collect your personal information from personal or business contacts of clients and investors (e.g., financial institutions, advisors, consultants, and other intermediaries or representatives) or other data subjects (e.g., recruiters or references for job applicants); other business contacts of Company personnel (e.g., financial institutions, service providers, consultants or advisors); research and subscription services; publicly-available sources; governmental agencies, supervisory authorities, and tax authorities; background check companies, credit agencies, or fraud prevention and detection agencies; automated collection on our Site (including through cookies); or from business and other records legally available to us. We may also receive other personal

information that you or others provide us or store on our systems, such as in communicating or otherwise interacting with us, including when you attend an event we sponsor, host or promote.

**Use or Disclosure of Sensitive Personal Information**

We do not use or disclose sensitive personal information for purposes of inferring characteristics about a consumer or for any other purposes other than as necessary to operate our business.

**Disclosure of Personal Information For Business Purposes in the Past 12 Months**

The following chart describes the categories of personal information that we disclosed to third parties for a business purpose in the 12 months prior to the date of this Policy:

Categories of Personal Information	Categories of Third Parties With Which We Shared Personal Information for a Business Purpose
<p><b>Personal identifiers:</b> Name, signature, postal address, email address, phone number, fax number, account name, Social Security number*, tax identification number*, photographs, copies of identification documents (e.g., passport, driver’s license)*, names of family members and those associated with an account including authorized signatories, IP address, device IDs and other similar identifiers, account log-in and password information*</p>	<p>Service providers that facilitate email communications, provide data security services, fraud detection and cloud-based data storage, host our Sites and assist with other IT-related functions, advertise and market our funds and services, provide fund administration services, provide analytics information, provide legal and accounting services, and host conferencing services.</p>
<p><b>Internet and other electronic activity information:</b> device and browser type, browsing and search history on our Sites, and information regarding interaction with our Sites</p>	<p>Service providers that facilitate email communications, provide data security services, fraud detection and cloud-based data storage, host our Sites and assist with other IT-related functions, provide analytics</p>
<p><b>Commercial and financial information:</b> records of property, funds, or services purchased, obtained, or considered; other investing or consuming histories or tendencies; information on investments, assets, expenses, accounts, net worth, tax information, holdings, account balances, transaction history, bank statements, credit history, and trust and estate planning documents</p>	<p>Service providers that facilitate email communications, provide security services and cloud-based data storage, host our Sites and assist with other IT-related functions, advertise and market our funds and services, provide fund administration services, provide analytics information, and provide legal and accounting services.</p>

The asterisk (\*) denotes a category of sensitive personal information.

### Business Purposes for Such Disclosures

We disclosed the aforementioned categories of personal information to the categories of third parties identified above for the following purposes: to facilitate email communications, data security services, fraud detection and cloud-based data storage, to host our Sites and assist with other IT-related functions, advertise and market our funds and services, provide analytics information, provide legal and accounting services, and host conferencing services.

### Additional Information About How We May Disclosure Personal Information and Purposes for Disclosures

We may also disclose your personal information as required or permitted by law to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property or the rights, property or safety of others, including to law enforcement agencies, and judicial and regulatory authorities. We may also disclose your personal information to third parties to help detect and protect against fraud or data security vulnerabilities. And we may disclose or transfer your personal information to a third party in the event of an actual or potential sale, merger, reorganization of our entity or other restructuring.

### **Our Use of Cookies and Analytics**

We may use cookies, pixel tags, web beacons and other similar tracking technologies (“tracking technologies”) to automatically collect information through our Sites. Tracking technologies are essentially small data files placed on your computer, tablet, mobile phone, or other devices that record certain pieces of information when you visit our Sites. We may use these tracking technologies to help identify irregular behavior, prevent fraudulent activity and improve security, as well as making it possible for you to save your preferences and help us understand how you interact with our Sites.

You may set your browser to notify you when you receive a cookie. Many web browsers also allow you to block cookies. You can disable cookies from your computer system by following the instructions on your browser or at [www.youradchoices.com](http://www.youradchoices.com).

We use Google Analytics to evaluate the use of our Sites. Google Analytics uses cookies and other identifiers to collect information, such as how often users visit our Sites, what pages they visit when they do so, and what other websites they visited prior to visiting our Site. For information about Google’s privacy practices, please refer to the Google Privacy Policy: <https://policies.google.com/privacy?hl=en-US#infocollect>.

### **Personal Information of Minors**

Our Sites are not directed to persons under age 13 and we do not knowingly sell or share for purposes of behavioral advertising the personal information of minors, including minors under the age of 16.

## **Do Not Track Signals**

At this time, our Sites do not respond to do not track signals.

## **Security Measures**

We aim to protect personal information by implementing and maintaining reasonable security measures, including administrative, technological, and physical safeguards that protect the security, confidentiality and integrity of the Personal Information we collect and which are appropriate to the sensitivity of the Personal Information we hold. While we take such measures to safeguard your personal information, we cannot guarantee the absolute security of our Sites and services. Data security incidents and breaches can occur due to factors that cannot reasonably be prevented. Accordingly, it cannot be assumed that the occurrence of any given incident or breach results from our failure to implement and maintain reasonable security.

## **Third-Party Links**

Our Sites may contain links to websites operated by third parties over which we have no control. Should you click on a link to a third-party website, the privacy policy of that website will apply instead of our Privacy Policy. We are not responsible for the content or security of third-party websites.

## **Changes to this Privacy Policy**

We will review and update this Policy periodically. We will notify you of material changes to the Policy by posting those changes on our Sites.

## **Accessibility**

We are committed to ensuring that our communications are accessible to people with disabilities. To make accessibility-related requests or report barriers, please contact us at 970-457-4340.

## **How To Contact Us**

If you have any questions or comments about this Policy, please feel free to contact us at 970-457-4340 or [compliance@deerparkrd.com](mailto:compliance@deerparkrd.com).

## **Rights of California Residents Regarding Personal Information**

If you are a California resident, you may have certain rights described in this section of our Policy, including rights covered by the California Consumer Privacy Act (the “CCPA”).

Please note that rights under the CCPA do not apply to information about Company investors that is covered by the Gramm-Leach-Bliley Act and implementing regulations, and the California Financial Information Privacy Act, laws which generally apply to nonpublic personal information about individuals who obtain financial funds or services from us primarily for personal, family, or household purposes.

### Right To Know About Personal Information We Collect

You may submit a request to us for any or all of the following types of information about the personal information we have collected about you in the 12 months prior to our receipt of your request:

- Specific pieces of personal information we have collected about you;
- Categories of personal information we have collected about you;
- Categories of sources from which such personal information was collected;
- Categories of personal information we sold or disclosed for a business purpose about you;
- Categories of third parties to whom the personal information was sold or disclosed for a business purpose; and/or
- The business or commercial purpose for collecting or selling your personal information.

### Right To Request Deletion of Personal Information We Have Collected From You

Upon your request and subject to exceptions in the law, we will delete the personal information we have collected from you.

### Your Right to Request to Correct Personal Information We Hold About You

You have the right to request that we correct personal information we hold that you believe is not accurate. We will take steps to determine the accuracy of the personal information that is the subject of your request to correct, and in doing so will consider the totality of the circumstances relating to the personal information you have identified as being incorrect. We may ask that you provide documentation regarding your request to correct in order to assist us in evaluating the request.

### California Shine the Light

California Civil Code Section 1798.83, also known as the “Shine the Light” law, permits California residents to annually request, free of charge, information about certain categories of personal information a business has disclosed to third parties for direct marketing purposes in the preceding calendar year. We do not share personal information of California residents with third parties for their own marketing purposes.

### Our Commitment to Honoring Your Rights

If you exercise any of the rights explained in this Policy, we will continue to treat you fairly. If you exercise your rights under this Policy, you will not be denied or charged different prices or rates for goods or services or provided a different level or quality of goods or services than others.

## Exercising Your Rights and How We Will Respond

To exercise your rights to know, delete or correct your personal information, or to ask a question, contact us at [compliance@deerparkrd.com](mailto:compliance@deerparkrd.com). For such requests, we will first acknowledge receipt of your request within 10 business days of receipt of your request. We will then provide a substantive response to your request as soon as we can, generally within 45 days from when we receive your request, although we may be allowed to take longer to process your request in certain jurisdictions or under certain circumstances. If we expect your request is going to take us longer than normal to fulfill, we will let you know.

We usually act on requests and provide information free of charge, but we may charge a reasonable fee to cover our administrative costs of providing the information in certain situations. In some cases, the law may allow us to refuse to act on certain requests. When this is the case, we will endeavor to provide you with an explanation as to why.

## Verification of Identity – Requests to Know, Delete or Correct

When you submit a CCPA request, we will ask you for two pieces of personal information and attempt to match it to information that we maintain about you in order to verify your identity.

If we are unable to verify your identity with the degree of certainty required, we will not be able to respond to the request. We will notify you to explain the basis of the denial.

## Authorized Agents

You may designate an agent to submit requests on your behalf. The agent can be a natural person or a business entity.

If you would like to designate an agent to act on your behalf, you and the agent will need to comply with our agent verification process. If the agent submits a request, the agent will need to provide us with your signed permission indicating the agent has been authorized to submit the request on your behalf. We will also require that you verify your identity directly with us or confirm with us that you provided the agent with permission to submit the request.

Please note that this subsection does not apply when an agent is authorized to act on your behalf pursuant to a valid power of attorney. Any such requests will be processed in accordance with California law pertaining to powers of attorney.