



Privacy Notice

Credit Value Partners, LLC and its subsidiaries (referred to collectively as "CVP" or "we" or "our") is committed to protecting the nonpublic personal and financial information of investors. We fulfill our commitment by establishing and implementing policies and systems to protect the security and confidentiality of this information. In our offices, we limit access to nonpublic personal and financial information about you to those personnel who need to know the information in order to service you. We maintain physical, electronic and procedural safeguards to protect your nonpublic personal and financial information.

CVP owns and operates this site [www.cvp7.com].

This Privacy Notice ("Notice"), together with our website terms of use [<http://cvp7.com/legal-terms>] and any other documents referred to in it, sets out the basis on which CVP processes personal data. Please read the following carefully to understand our views and practices regarding how we handle personal data.

Categories of Information We Collect

We may collect the following types of nonpublic personal and financial information about you from the following sources:

- Your name, address and identifying numbers, and other personal and financial information, from you and from subscription documents you submit to us or other related documents or forms.
- Information about your account balances and financial transactions with us, our affiliated entities, and from nonaffiliated third parties.
- Information about your account balances and financial transactions and other personal and financial information, from nonaffiliated third parties, to verify information received from you or others.

Categories of Information We Disclose to Nonaffiliated Third Parties

We may disclose your name, address and account and other identifying numbers, as well as information about your pending or past transactions and other personal financial information, to nonaffiliated third parties, as necessary to administer and service the private investment funds in which you are invested.

We may disclose nonpublic personal and financial information concerning you to law enforcement agencies, federal regulatory agencies, self-regulatory organizations or other nonaffiliated third parties pursuant to a court order, judicial subpoena or regulatory inquiry.

We do not otherwise disclose your nonpublic personal and financial information to nonaffiliated third parties, except where we believe in good faith that disclosure is required or permitted by law. Because

we do not disclose your nonpublic personal and financial information to nonaffiliated third parties except as noted above, our Privacy Notice does not contain opt-out provisions.

Categories of Information We Disclose to Our Affiliated Entities

We disclose your name, address and account and other identifying numbers, account balances and information about your pending or past transactions to our affiliates to administer and service private investment funds in which you are invested.

Information about Former Investors

We do not disclose nonpublic personal and financial information about former investors to nonaffiliated third parties unless required or requested to do so by a court order, judicial subpoena or regulatory inquiry, or otherwise where we believe in good faith that disclosure is required or permitted by law.

For EU GDPR Subject Persons

CVP is committed to respecting the privacy of individuals, including its clients.

For the purposes of applicable data protection law (in particular, the General Data Protection Regulation (EU) 2016/679 (the "GDPR")), the entity referred to above is the "data controller" of your personal data.

Personal Data We collect

We will collect and process the following personal data:

- **Information you give us:**
 - If you are enquiring about or using our products and services (including, where you invest in CVP managed funds and accounts ("CVP funds"), and/or where you instruct CVP to invest in other funds on your behalf), then we will process your personal data - including your name, address, e-mail address and phone number, financial and credit card information, personal description, photograph, ID documentation (including your passport or ID card), marital status, information about you dependents or beneficiaries, as well as information about your investments in CVP funds.
 - You may give us information about you by corresponding with us by phone, e-mail or other electronic means, or in writing. This includes information you provide when you make enquiries or purchase our services – including your name, email address, gender, postal address, telephone and fax.
- **Information we collect about you:** With regard to each of your visits to our site, we have the ability to collect the following information:
 - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
 - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products, services or

issues you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

- **Information we receive from other sources:**

- CVP delegates certain administrative services in relation to its funds to certain third-parties, who act as CVP's administrative and transfer agents in relation to its funds. This means that the third-parties are primarily responsible for collecting personal data of our fund shareholders and investors, holding it on CVP's behalf, and providing it to CVP for reporting purposes.
- We are part of a global group of companies which manage funds and provide other financial services. Where you have requested services which involve one or more of our subsidiaries and/ or affiliates, we will tell you, and we will receive relevant information from our subsidiaries and/ or affiliates for the purposes of those services.
- We also work closely with third parties (for example, banks and other financial institutions, business partners, legal or other consultants, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and will receive information about you from them.

- **Information about other people:** If you provide information to us about any person other than yourself, such as your relatives, your executors, next of kin, your advisers or your suppliers, you must ensure that they understand how their information will be used, and that they have given their permission for you to disclose it to us and for you to allow us, and our outsourced service providers, to use it.

- **Sensitive Personal Data:** In certain limited cases, we will collect certain sensitive personal data from you (that is, information about your racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life, or details of criminal offences, or genetic or biometric data). However, we will only do so on the basis of your explicit consent.

Purposes and Legal Basis for processing

We may ask you for consent to collect or process your personal data on certain occasions, for example, and as stated below, where necessary in order to contact you with information about products and services that might be of interest to you.

We also process your personal data when we need to do this to fulfil a contract with you, such as to give effect to your investment in a CVP fund, or when required by law, such as if we receive a request from law enforcement or other government officials.

We also process your personal data when it is in our legitimate interests to do this and when these interests are not overridden by your data protection rights.

In particular:

- we use your personal data in order to effectively administer the CVP funds and our business;

- we use your personal data to undertake commercial and legal due diligence on our investors, in order to assess their activities and condition in relation to their investments and the provision of our services;
- we monitor use of our websites, and use your personal data to help us monitor, improve and protect our services and websites, both online and offline, and to ensure the security and integrity of our websites;
- we monitor investor accounts to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law; and
- we will use personal data in connection with legal claims, compliance, regulatory and investigative purposes as necessary (including disclosure of such information in connection with legal process or litigation).

We have a legitimate interest in the effective administration of the CVP funds and our business, and in ensuring the security and integrity of our sites. We have carried out balancing tests for all the data processing we undertake on the basis of our legitimate interests, which we have described above. You can obtain information on any of our balancing tests by contacting us using the details set out later in this Notice.

[Disclosure of Your Personal Data](#)

We may share your personal data with our subsidiaries and/ or affiliates. You can see more about our group companies here: www.nylinvestments.com/investmentsgroup/privacy-policy.

We will also share your personal data with trusted third parties including:

- Banks and other financial institutions which, for example, act as transfer agents or custodians of the CVP funds;
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you;
- Legal or other advisers, consultants and other professional experts, complainants, correspondents and enquirers, and suppliers and service providers of any of the above, and each of their associated businesses;
- Business partners, suppliers and sub-contractors only for the purposes of performance of any contract we enter into with them or you. We take reasonable steps to ensure that our staff protect your personal data, and are aware of their information security obligations; and
- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

We will disclose your personal data to third parties:

- If we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- If CVP, its business, or its assets are acquired by a third party, in which case personal data held by it about its users, suppliers, or customers will be one of the transferred assets;

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions [<http://cvp7.com/legal-terms>] and other agreements; or if we reasonably consider this necessary; or to protect the rights, property, or safety of CVP, our users, our customers, or others; and
- For the purposes of crime prevention and fraud protection.

Marketing Communications

We, or trusted third parties on our behalf, may contact you by email or post with information about products and services that might be of interest to you. Where necessary, at the time that you provide your personal data to us, you will be given the opportunity to indicate whether or not you are happy for us to use your personal data in order to tell you about such products or services.

You can unsubscribe from this at any time by clicking on the link provided in the relevant email, by amending your marketing preferences in your account within our site, or by emailing us using the contact details provided below.

Where We Store Your Personal Data and How We Protect it

Some of the CVP subsidiaries and/ or affiliates and third parties to whom CVP discloses your personal data (as described above) are located in countries outside the EEA that do not provide a level of protection to personal data equivalent to that provided by your home country.

Specifically, those providers are located in the following territories:

- United States;
- Cayman Islands;
- Jersey, Channel Islands

In order to provide adequate protection for these transfers, CVP has executed European Commission-approved standard contractual clauses, where required, pursuant to Article 46 (2) of the GDPR. To obtain a copy of the transfer mechanism, please contact us using the details provided below.

We take reasonable steps to protect your personal data from loss or destruction. Where you have a username or password (or other identification information) which enables you to access certain services or parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our site; any transmission is at your own risk. Once we have received your personal data, we will use strict procedures and security features to try to prevent unauthorised access.

Your Rights

You have various rights with respect to our use of your personal data:

- **Access:** You have the right to request a copy of the personal data that we hold about you. Please note that there are exceptions to this right, so that access may be denied if, for example, making

the information available to you would reveal personal data about another person, or if we are legally prevented from disclosing such information. You are entitled to see the personal data held about you. If you wish to do this, please contact us using the contact details provided below.

- **Accuracy:** We aim to keep your personal data accurate, current, and complete. We encourage you to contact us using the contact details provided below to let us know if any of your personal data is not accurate or changes, so that we can keep your personal data up-to-date. You can also review and correct/ update some of your personal data by logging-in to your account on our site.
- **Objecting:** In certain circumstances, you also have the right to object to processing of your personal data and to ask us to block, erase and restrict your personal data. If you would like us to stop using your personal data, please contact us using the contact details provided below.
- **Porting:** You have the right to request that some of your personal data is provided to you, or to another data controller, in a commonly used, machine-readable format.
- **Complaints:** If you believe that your data protection rights may have been breached, you have the right to lodge a complaint the applicable supervisory authority or to seek a remedy through the courts.

Please note that there are exceptions to these rights, if, for example, we are under a legal obligation to continue to process your personal data.

When we ask you to supply us with personal data we will make it clear whether the personal data we are asking for must be supplied so that we can provide the products and services to you, or whether the supply of any personal data we ask for is optional.

[How Long We Keep Your Personal Data](#)

We will retain your personal data, whether or not your account is active, for as long as we believe it necessary or desirable to fulfil our business purposes or to comply with applicable law, audit requirements, regulatory requests or orders from competent courts.

Personal Data collected will be retained pursuant to our record retention policy, and in most instances will not be retained longer than nine (9) years from the date of last use.

[Changes to our Privacy Notice](#)

Any changes we make to our Notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Notice.

[Contact Details](#)

Questions, comments and requests regarding this Notice are welcomed and should be addressed to Credit Value Partners, LLC (ir@cvp7.com), 49 West Putnam Avenue, Greenwich, CT 06830, USA.