



CALIFORNIA WEBSITE PRIVACY POLICY

This California Website Privacy Policy supplements the Website Privacy Policy with respect to specific rights granted under the California Consumer Privacy Act of 2018 (as amended, the “CCPA”) to natural person California residents and provides information regarding how such California residents can exercise their rights under the CCPA. This supplement is only relevant to you if you are a resident of California as determined in accordance with the CCPA. Information required to be disclosed to California residents under the CCPA regarding the collection of their personal information that is not set forth in this CCPA supplement is otherwise set forth in the Website Privacy Policy. To the extent there is any conflict with the privacy requirements under the Gramm-Leach-Bliley Act and/or Regulation S-P (“GLB Rights”), GLB Rights shall apply.

What does this Website Privacy Policy apply to?

This Website Privacy Policy applies solely to your interactions with us through our Website (as defined below). If you provide personal information to use through another means (e.g., as an employee or seeking employment, as a client, or as an investor) you will receive a separate privacy notice and that notice will govern that personal information.

What information do we collect about you?

We collect limited types of personal information through our website and investor reporting portals, as well as through other electronic communications (e.g., emails), as applicable (collectively, the “Website”). The types of personal information we collect about you depends on the nature of your interaction with us. The categories of personal information we have collected from individuals on this Website over the last twelve (12) months include the following:

- Identifiers, such as name, contact details and address (including physical address, email address and Internet Protocol address);
- Other customer records, such as telephone number and personal information provided in connection with obtaining account access;
- Commercial information, such as account data;
- Internet or other electronic network activity information, such as information regarding your use of our Website (e.g., cookies, browsing history and/or search history), as well as information you provide to us when you correspond with us in relation to inquiries.

We do not knowingly collect or solicit personal information from anyone under the age of 18.

How do we obtain your personal information?

In connection with forming and operating our Website, we collect and maintain your nonpublic personal information from the following sources:

- Information from your communications with us in connection with this Website, including any update notices provided by you.
- Information captured on our Website, including registration information, information provided through online forms and any information captured via cookies.

How do we use your personal information?

We will use your personal information for one or more of the following business purposes:

- To perform services for you.
- To communicate with you, including responding to requests for information submitted by you through our Website.
- To keep a record of your relationship with us.
- Ongoing operations, administrative, accounting, reporting, account maintenance and other processes.
- To audit and verify the quality and effectiveness of our services and compliance.
- To detect security incidents and to protect against malicious, deceptive, fraudulent, or illegal activity.
- To generally comply with U.S., state, local and non-U.S. laws, rules and regulations.

Additionally, we may use your personal information to keep you informed of our products and services, if you have requested that we do so, or where we have an existing relationship with you and we wish to contact you about products and services similar to those which we provide you, in which you may be interested.

Who do we share your personal information with?

We do not sell any of the personal information we collect about you to third parties.

We do not disclose any nonpublic personal information about you to anyone, except as permitted or required by law or regulation and to affiliates and service providers, including but not limited to administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents. We may also disclose your information to other parties as may be required by law or regulation, or in response to regulatory inquiries.

Within the last twelve (12) months, we have shared each of the categories of personal information collected in connection with our Website with affiliates and service providers as set forth above in “**What information do we collect about you?**”

How do we keep your personal information secure?

We consider the protection of sensitive information to be a sound business practice, and to that end we employ appropriate organizational, physical, technical and procedural safeguards, which seek to protect your personal information in our possession or under our control to the extent possible from unauthorized access and improper use.

Your rights under the CCPA

Deletion Rights: You have the right to request that we delete any of your personal information that we retain, subject to certain statutory exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations. We will notify you in writing if we cannot comply with a specific request and provide an explanation of the reasons.

Disclosure and Access Rights: You have the right to request that we disclose to you certain information regarding our collection and use of personal information specific to you over the last twelve (12) months. Such information includes:

- the categories of personal information we collected about you;
- the categories of sources from which the personal information is collected;
- our business or commercial purpose for collecting such personal information;
- the categories of third parties with whom we share the personal information;
- the specific pieces of personal information we have collected about you; and
- whether we disclosed your personal information to a third party, and, if yes, the categories of personal information that each recipient obtained.

No Discrimination: We will not discriminate against you for exercising your rights under the CCPA, including by denying service, suggesting that you will receive, or charging, different rates for services or suggesting that you will receive, or providing, a different level or quality of service to you.

How to Exercise Your Rights: To exercise any of your rights under the CCPA, or to access this notice in an alternative format, please submit a request on your behalf using any of the methods set forth in the Contact us section below.

Contact us

For any requests relating to the exercise of your rights under the CCPA, or questions regarding our processing of your personal information, please submit or have your authorized representative submit a request using the method set forth below.

Email us at the following email addresses: tbraddock@stellexcapital.com or info@stellexcapital.com.

We will contact you to confirm receipt of your request under the CCPA and request any additional information necessary to verify your request. We verify requests by matching information provided in connection with your request to information contained in our records. Depending on the sensitivity of the request and the varying levels of risk in responding to such requests (for example, the risk of responding to fraudulent or malicious requests), we may request further information or your investor portal access credentials, if applicable, in order to verify your request. You may designate an authorized agent to make a request under the CCPA on your behalf, provided that you provide a signed agreement verifying such authorized agent's authority to make requests on your behalf, and we may verify such authorized person's identity using the procedures above.

Our goal is to respond to any verifiable consumer request within forty-five (45) days of our receipt of such request, but in certain cases, additional time might be required. Please contact the Chief Compliance Officer of Stellex at tbraddock@stellexcapital.com with any questions about this California Website Privacy Policy.