



EU WEBSITE PRIVACY POLICY

OUR COMMITMENT TO PRIVACY

Your privacy is important to Stellex Capital Management LP and its affiliates (together, “Stellex,” “our” or “us,” “we”). To better protect your privacy, we are providing information explaining our online information practices.

This EU Website Privacy Policy describes how we gather and use information through this website, our online investor portal, as well as through other electronic communications (*e.g.*, emails), as applicable, in each case, from persons that are from the European Union (“EU”), and supersedes the Website Privacy Policy and California Website Privacy Policy of Stellex linked to this website with respect to EU users, as applicable. Please read this EU Website Privacy Policy carefully.

For the purposes of applicable EU laws, Stellex will be a data controller of any personal data collected by us. If you have any questions regarding our use of your personal data, or this EU Website Privacy Policy, please contact Tony Braddock, the Chief Compliance Officer of Stellex at tbraddock@stellexcapital.com.

We rely on various legal bases under applicable data protection legislation in order to process your personal information (*e.g.*, email, IP address, etc.), including our legitimate interests, contractual necessity and as required by applicable law. We use the personal information we collect to operate our business and provide you with the services and products we offer and perform essential business operations. We do not collect any special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data, etc.). Nor do we collect any information about criminal convictions and offences.

If we require your personal information due to a legal requirement or obligation or in order to perform a contract with you, we will make you aware of this at the time we collect your personal data, and the possible consequences of you failing to provide this personal data. Failure to provide this information means that we cannot provide our services or products to you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

Further information about the legal basis under which we process your personal information is included in the section headed “*Why we use your personal information.*”

You do not need to take any action as a result of this EU Website Privacy Policy, but you do have certain rights as described below in the section headed “*Your rights.*”

HOW WE OBTAIN YOUR PERSONAL INFORMATION

Information you provide to us

We collect your personal information when you decide to interact with us and we only collect the information necessary to carry out our business for the purposes set out below. You can provide us with personal information via email, post, telephone and this website and when you log in to the investor online portal. We also collect information about you through automated technology.

Information provided by third parties or publicly available sources

We also process information in relation to companies that we are evaluating in connection with a potential investment in or purchase of such companies. In this situation, your personal data will be provided to us by third parties involved in that potential transaction (including the target of any investment).

WHY WE USE YOUR PERSONAL INFORMATION

To the extent that you provide us with any personal information, through or in connection with this website (*i.e.*, via online form, telephone, email or post) or the investor online portal, we may use such information for the following purposes:

Purpose	Legal Basis
To provide you with the services or products you have requested.	Contractual necessity
To keep a record of your relationship with us.	Legitimate interest
To verify your identity.	Legal requirement
To conduct due diligence activities in connection with an actual or prospective corporate transaction or investment with respect to which we are party to.	Legitimate interest
Fraud and abuse prevention.	Legitimate interest
Litigation management and conducting internal audits and investigations.	Legitimate interest
To administer and protect our business and this website.	Legitimate interest
To make suggestions and recommendations to you about goods or services that may be of interest to you.	Legitimate interest

No automated decision-making, including profiling, is used when processing your personal information.

DISCLOSURE AND TRANSFER OF PERSONAL INFORMATION

Unfortunately, the transmission of information and data via the Internet is not completely secure. Although we do our best to protect your personal data, we cannot guarantee the security of any information or data transmitted to or through this website; any transmission of information or data by you to or through this website is at your sole risk.

Your personal information will be shared with and processed by our affiliates and certain service providers as necessary to fulfil the purposes set out in this policy, including professional advisors, recruitment firms, consultants, placement agents and data hosting providers. We seek to ensure that anyone who provides a service to, or for us, involving personal data enters into an agreement with us and meets our standards for data security. To the extent your personal information is transferred to countries outside of the EEA, such transfers will only be made in accordance with applicable data privacy laws. For further information about the safeguards/derogations used, please contact Tony Braddock, the Chief Compliance Officer of Stellex at tbraddock@stellexcapital.com.

We reserve the right to disclose your personal information as required by applicable law, or when we believe that disclosure is necessary to protect our rights and/or comply with a judicial proceeding, court order, request from a regulator, national security, for the purposes of public importance or any other legal or investigatory process involving us. Should we, or any of our affiliated entities, be the subject

of a takeover, divestment or acquisition, we may disclose your personal information to the new owner of the relevant business and their advisors on the basis of our legitimate interest.

SECURITY AND RETENTION OF PERSONAL INFORMATION

We are committed to protecting the personal information you entrust to us. We adopt robust and appropriate technologies and policies, so the information we have about you is protected to the extent possible from unauthorized access and improper use. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

We will keep your personal information only for as long as is reasonably necessary for the purposes set out in this EU Website Privacy Policy, unless a longer retention period is required by applicable law. We will not keep more information than we need for those purposes. For further information about how long we will keep your personal information, please contact Tony Braddock, the Chief Compliance Officer of Stellex at tbraddock@stellexcapital.com.

CAPACITY

This website is only intended for individuals who are at least 18 years of age. We do not knowingly encourage or solicit visitors to this website who are under the age of 18 or knowingly collect personal information from anyone under the age of 18 without parental consent. If we learn we have collected or received personal information from an individual under the age of 18, we will delete that information.

COOKIES

Information regarding how you access this website (*e.g.*, browser type, access times and IP address) and your hardware and software is automatically collected through the use of cookies (a small text file placed on your hard drive) or other technologies or tools. This information is used to improve website performance and for our business purposes. You may opt-in to accept cookies automatically by changing the settings on your browser. If you opt-out of certain cookies, you may not be able to access certain parts of this website. You may wish to visit www.aboutcookies.org, which contains comprehensive information about types of cookies, how they are used and how you manage your cookie preferences.

YOUR RIGHTS

You have the right to access the personal information we hold about you, and there are a number of ways you can control the way in which and what information we store and process about you. To exercise these rights and controls, please contact Tony Braddock, the Chief Compliance Officer of Stellex at tbraddock@stellexcapital.com.

- **Access**: You have the right to ask for a copy of the personal information that we hold about you free of charge; however, we may charge a “reasonable fee,” if we think that your request is excessive, to help us cover the costs of locating the information you have requested.
- **Correction**: You may notify us of changes to your personal information if it is inaccurate or it needs to be updated.

- **Deletion**: If you think that we should not be holding or processing your personal information any more, you may request that we delete it. Please note that this may not always be possible due to legal obligations.
- **Restrictions on use**: You may request that we stop processing your personal information (other than storing it), if: (i) you contest the accuracy of it (until the accuracy is verified); (ii) you believe the processing is against applicable law; (iii) you believe that we no longer need your data for the purposes for which it was collected, but you still need your data to establish or defend a legal claim; or (iv) you object to the processing, and we are verifying whether our legitimate grounds to process your personal information, override your own rights.
- **Object**: You have the right to object to processing, including: (i) for direct marketing; (ii) for research or statistical purposes; or (iii) where processing is based on legitimate interests.
- **Portability**: If you wish to transfer your personal information to another organization (and certain conditions are satisfied), you may ask us to do so, and we will send it directly if we have the technical means.
- **Withdrawal of consent**: If you previously gave us your consent (by a clear affirmative action) to allow us to process your personal information for a particular purpose, but you no longer wish to consent to us doing so, you can contact us to let us know that you withdraw that consent.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

NOTIFICATION OF CHANGES

We reserve the right to amend this EU Website Privacy Policy from time to time by updating this EU Website Privacy Policy. If we decide to change our EU Website Privacy Policy, we will post those changes so our users are always aware of what information we collect, how we use it and under what circumstances, if any, we disclose it. If at any point we decide to collect personal information or use any collected information in a manner different from that stated at the time it was collected, we will notify applicable users. We will use information only in accordance with this EU Website Privacy Policy under which the information was collected.

CONTACT US

If you have any questions or concerns about this EU Website Privacy Policy, please contact Tony Braddock, the Chief Compliance Officer of Stellex at tbraddock@stellexcapital.com.

COMPLAINTS

Should you wish to lodge a complaint with regards to how your personal information has been processed by us, please contact your local supervisory authority. In the UK, this is the Information Commissioner's Office – <https://ico.org.uk/global/contact-us>.