

***DATA PROTECTION INFORMATION AND DISCLOSURES TO PERSONS WHOSE  
PERSONAL INFORMATION WE PROCESS IN THE DUBAI INTERNATIONAL  
FINANCIAL CENTRE***

In the course of our correspondence and other dealings with you, we will receive information relating to you and/or, where you act as an agent or a representative of a legal person or other entity (rather than a natural person), information relating to other officers, directors, partners, members or employees of that legal person or other entity (such information, “personal information”). If the personal information you provide to us does not relate to you, you agree to provide the disclosures set out below to the individuals whose personal information you have provided. These disclosures to recipients in the Dubai International Financial Centre (“DIFC”) (“DIFC Disclosures”) supplement, but do not replace the disclosures made in the SVP Privacy Policy.

Personal information is subject to certain legal safeguards specified in the Dubai International Financial Centre Data Protection Law DIFC Law No. 5 of 2020 (“DIFC DPL”). SVP<sup>1</sup> (the “Firm” or “we”) is a ‘controller’ of your personal information for the purposes of the DIFC DPL, to the extent we process your personal information in the Dubai International Financial Centre (“DIFC”) as part of our representative office in the DIFC. The DIFC DPL prescribes the way in which we may collect, retain and handle personal information.

***With whom do we share your personal information?***

We may share certain of your personal information processed in the DIFC with companies, partnerships and other entities within our group, for internal administrative purposes; in order to enable our Firm to provide information to you regarding the Firm and to operate our business.

In addition, we may share certain of your personal information with the following categories of third parties for the following reasons:

- broker-dealers that provide trade execution services, custodians that provide custody services and other business services providers in connection with the administration and management of an investment account you hold with us (or one of our funds) and in connection with investment decisions, with respect to an investment account you hold with us and/or to enable the Firm to provide services and operate its business;
- advisers (e.g. auditors, legal counsel and tax advisers) to the Firm relating to or in connection with the operation of the Firm’s business, compliance with its legal, regulatory or contractual obligations and/or your investments with us;
- affiliates of the Firm in connection with the services provided to you; and
- law enforcement agencies; regulatory or tax authorities and other governmental or public agencies or authorities in order to comply with our legal or regulatory obligations or at their request in furtherance of their objectives.

They may in turn use the services of their affiliates or service providers to process your personal information where necessary or appropriate. Where we share your personal information with a third party, we, to the best of our ability, take steps to help ensure the recipients of that personal information will process it appropriately.

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<sup>1</sup> Including, solely for the purposes of this disclosure, the following companies, partnerships and other entities: Strategic Value Partners, LLC through its representative office in the Dubai International Financial Centre.

### ***What personal information will we process?***

The types of personal information which we process in the DIFC relating to you are likely to be limited and may include, for example:

- Contact information: name, address, email, telephone number and other contact details.
- Background information: information required to perform, or revealed in, know-your-customer (KYC) and anti-money laundering (AML) due diligence, investor accreditation and consents, date of birth, place of birth, information contained in identification materials (e.g. passports and driving licenses) status under various laws and regulations, including their identification/social security number, tax status, income and assets, PEP status, sanctions status and related parties' power of attorney and sources of funds used for capital commitments and investments
- Financial information: assets, income and losses, net worth, amounts and types of investments, risk tolerance, capital account balances, capital commitments, capital contributions, account data, other investment participation information, funds transfer information, beneficiaries, positions, percentages of fund, share or option numbers and values, vesting information, investment and transaction experience, history and activity as well as other transaction and investment information, tax status and information;
- Investment information: information about your interest in the relevant investment, including ownership percentage, capital commitment or investment, income and losses; and
- Technical or account information: electronic device and usage information (for example, from cookies and similar technology in relation to the use of website, fund data rooms and investor reporting portals), registration information and account (including online account) data.
- Meeting information: brief summary of meetings we (via our representative office in the DIFC) have had with you.

### ***How do we use your personal information?***

We may process your personal information to process queries, undertake normal business activities in order to offer our services and manage assets on behalf of clients, and to exercise our rights at law or under contract. We may also use your personal information, where required, in order to comply with our legal and regulatory obligations. This may include, without limitation, establishing investor eligibility, preventing fraud, carrying out money laundering checks or conflict checks, and reporting to national and international regulatory and tax authorities.

We may also process your personal information to manage and administer our business, to analyze and improve relationships with our clients and service providers, and for business development activities.

In addition to the disclosure under "With whom do we share your personal information" above, we may share your personal information with third parties (including legal advisors and law enforcement agencies) in order to respond to investigations, court orders, legal process, or to investigate, prevent or take action regarding illegal activities, suspected fraud, or as otherwise required by law.

If you object to being contacted in respect of prospective products, please contact the Firm at

[InvestorRelations@svpglobal.com](mailto:InvestorRelations@svpglobal.com) or via any of the methods specified below.

***Lawful bases for processing your personal information***

When processing your personal information in the DIFC, we will comply with the relevant requirements under the DIFC DPL as applicable to us.

Your personal information may be processed in the DIFC on the basis of our legitimate

interests, except where such interests are overridden by your interests or rights. Our legitimate interests may include the following:

- to transfer personal information within our group of companies, partnerships and other entities, for internal administrative purposes;
- to help detect, prevent, investigate, and prosecute fraud and/or other criminal activity;
- to undertake risk assessment and operational control exercises; and for systems administration, operation, testing and support and to manage and ensure the security of our information systems;
- for research, statistical and trend analysis;
- to exercise and comply with the Firm's rights and obligations at law or under regulation, or under a contract to which we are a party;
- to manage and administer our business and to analyse and improve our business relationships;
- to communicate with you;
- to disclose information to a governmental, tax or regulatory body, counterparties, court, auditors or other third parties and to undertake compliance activities, when this is in our interests, or in the interests of any of our clients, including where the laws of the DIFC do not require us to do the same;
- to establish, exercise or defend legal claims; and in order to protect and enforce the rights, property, or safety of the Firm, our clients, or to assist our clients or investors or others to do the same; and
- to investigate and respond to any complaints about the Firm and its business or any incidents relating to the Firm and to help maintain quality and to deal with complaints and disputes.

In addition to the above, the lawful bases for processing your personal information in the DIFC may be as follows:

**Performance of contract:** to ensure our ability to perform our obligations under contracts and other documents that form the basis for our contractual relationship with you (or, in certain circumstances, another person), and certain required pre-contractual steps. If we cannot process personal information as required, it may not be possible for us to perform our obligations under the relevant contract, and we may be required to terminate the contract.

**Legal obligations:** we are required to comply with applicable legal and regulatory requirements, including, for example, any regulatory or tax reporting requirements; to carry out money laundering/terrorist financing checks, conflict checks, for purposes of fraud prevention, to comply with any applicable auditing or financial reporting requirements; and to comply with information disclosure requests from regulatory, tax or other governmental or public authorities.

### ***Transfers of your personal information out of the DIFC***

The Firm may transfer certain of your personal information from the DIFC to a third country, in particular to its affiliates outside the DIFC and to third party service providers located outside the DIFC, as described above. Such transfers may be made at least to the following

jurisdictions: the United States, the United Kingdom, member states of the European Economic Area, and the Cayman Islands.

Where we share your personal information with parties outside the DIFC we will do so where there is an adequate level of protection in the country where the relevant party outside the DIFC is.

Where we share your personal information with parties outside the DIFC where there is not an adequate level of protection, we will, to the extent practicable, take appropriate steps to ensure your personal information is subject to appropriate or suitable safeguards in compliance with the requirements of the DIFC DPL. We will seek to achieve this by entering into appropriate data transfer agreements with third party recipients of your personal information which may set out standard data protection clauses as adopted by the Commissioner (as defined in the DIFC DPL), where possible.

It may, in some circumstances, be necessary to transfer your personal information outside the DIFC to jurisdictions whose data protection laws do not provide substantially the same level of protection for your personal information, including in circumstances where the transfer is not subject to specific safeguards with respect to processing of personal information. We will not transfer your personal information in such circumstances unless the transfer is necessary for the purposes of our legitimate interests where such interests are not overridden by your interests. Further, we will not transfer your personal information in such circumstances unless we are required to do so pursuant to a legal requirement, or regulatory obligation.

#### ***How long is your personal information retained?***

We will not seek to retain your personal information for longer than is necessary in relation to the purposes for which your personal information is processed and in accordance with regulatory requirements. Generally, we will retain your personal information concerning your investments for 5 years after the end of any relevant relationship. Personal information may be retained for longer if it is required by law, or by a tax or regulatory authority, a law enforcement agency or other governmental or public body, or considered necessary in order to allow us to act in accordance with a specific set of circumstances, for example, in light of an actual or a potential legal action or a regulatory investigation.

#### ***Where do we collect your Personal Information?***

The Firm may collect personal data through a range of means. These may include direct interactions (where a person provides personal data to us through correspondence or other direct methods of communication) and third-party or publicly available sources (where the Firm receives personal data through a publicly available source such as a website or publicly-available registry).

#### ***Your rights in relation to the personal information we process about you***

You have various rights under the DIFC DPL in relation to the personal information relating to you. These include:

- the right to request access to your personal information;
- the right to have your personal information rectified;

- the right to have your personal information erased in certain circumstances;
- the right to request that your personal information is only used for restricted purposes;
- (if the lawful basis for processing your personal information is the legitimate interest of the Firm) the right to object to your personal information being processed, for example, for marketing purposes;
- (in some circumstances) the right to require certain of your personal information to be transferred to you or a third party; and
- the right to lodge a complaint with the relevant data regulator.

You can seek to exercise any of these rights by contacting us via any of the methods set out below in the Questions or complaints section.

### ***Non-Discrimination***

Under the DIFC DPL, you cannot be discriminated against for exercising any of your rights in relation to the personal information we process about you.

### ***Questions or complaints***

If you have any questions or complaints regarding the processing of your personal information, please contact us directly by writing to us at [InvestorRelations@svpglobal.com](mailto:InvestorRelations@svpglobal.com), by calling us (including via a reverse charge call) at +1-203-618-3500, or by writing to us at:

Strategic Value Partners, LLC  
100 West Putnam Avenue  
Greenwich, CT 06830  
Attn: Investor Relations

Complaints regarding our processing of your personal information may also be made directly to the relevant data protection regulator (i.e. the Commissioner, as defined in the DIFC DPL).

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