

DATA PRIVACY NOTICE

CIFC Credit Funds ICAV

PURPOSE AND APPLICATION OF THIS NOTICE

This data privacy notice (“**Notice**”) explains how CIFC Credit Funds ICAV (the “**ICAV**”, “**we**”, “**our**” and “**us**”) collects, uses and discloses information relating to you (“**personal data**”) in its capacity as a data controller. It also sets out your rights in relation to your personal data and who you can contact for more information.

We provide this Notice in accordance with our obligations under the European Union General Data Protection Regulation (EU) 2016/679 and any other applicable data protection laws, and as part of our commitment to process personal data in an open, transparent and secure manner.

CONTACT DETAILS

If you would like to contact us regarding the processing of your personal data, you can do so as follows:

Email: cifc.investordealing@jpmorgan.com

Post: The Directors of the CIFC Credit Funds ICAV
Ten Earlsfort Terrace
Dublin 2
D02 T380
Ireland

1. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

Where we use personal data relating to you for the purposes set out in this Notice, we are the “**data controller**” of that personal data. For example, where you are an investor in the ICAV, we will process your personal data as a data controller for the purposes set out in this Notice. As a data controller we are subject to requirements under data protection laws and we put in place measures and controls designed to ensure compliance with such laws.

2. PERSONAL DATA COLLECTION AND USE

We typically collect or obtain personal data because you give it to us (for example, when you complete an application form in order to invest in the ICAV) or because other people give that information to us (for example, you provide information to a service provider that we use to assist us with the operation of the ICAV, such as the administrator of the ICAV) or because such personal data is disclosed on publicly available sources such as business and employment oriented social networking services.

The personal data that we collect or obtain typically includes:

2.1 Identity Information and Address

Identity information (such as your name, date of birth, gender, internally-generated ID numbers) and, if you contact us, proof of identification. We may also process your address and, if provided to us, other contact information (for example your e-mail address and/or telephone number).

2.2 Financial Information

Information pertaining to your investment in the ICAV (for example the value of your investment and the type of investment). Information relating to your bank account (for example your bank account number and other account related information), financial standing and history, income, tax residency, assets, tax-related information and employment-related information. We may also process details relating to your investment activity, experience, the previous transactions you have entered into, and holdings.

2.3 **Business Records**

Copies, notes and records relating to any correspondence and communications with or relating to you, such as copies of letters between us and you if you contact us. Data we add to records associated with you and business records relating to any current or former investment by you in the ICAV. We may also process data relating to you for compliance with our relevant legal, regulatory and compliance obligations and our prudential practices (for example we may process one or more of your identification documents to assist us in comply with our anti-money laundering obligations). We would not typically process data relating to criminal convictions or allegations of offences but may do so where required or authorised by applicable laws.

In some cases, we will also collect personal data about you indirectly from third parties such as: (1) providers of services and other functions to the ICAV (such as the fund administrator and providers of services that help us meet our anti-money laundering and other regulatory obligations); (2) publicly available sources such as business oriented social networking services like LinkedIn.

3. **PURPOSES FOR COLLECTING AND USING YOUR PERSONAL DATA**

We will only collect your personal data for a specific purpose and will only use your personal data for achieving that purpose and related purposes. We process personal data for the following purposes and for compatible purposes:

- 3.1 **Managing and Administering your Holding in the ICAV:** This involves managing and administering your holding in the ICAV and any related accounts on an ongoing basis in accordance with any agreement we may have with you and providing information and support to you in connection with your holding in the ICAV.
- 3.2 **Managing and Improving our Business Operations and Practices:** This includes maintaining and improving internal business processes, practices, strategy and information technology, testing new systems and upgrading existing systems, carrying out internal functions such as preparing business reports and accounts, ensuring business continuity and disaster recovery and responding to information technology and business incidents, ensuring adequate network and information security, keeping appropriate records, maintaining prudent operations management (for example, carrying out audits, risk assessments, training and putting in place insurance), meeting our corporate social responsibilities and responding to any correspondence from you (including verifying your identity). To the extent allowed by applicable law, this may include recording telephone conversations and monitoring emails.
- 3.3 **Carrying out Statistical Analysis and Market Research:** This includes business and statistical analysis and market research relevant to the ICAV and our operations.
- 3.4 **Meeting Legal and Regulatory Requirements and Protecting Our Rights:** This includes taking steps to comply with legal and regulatory obligations applicable to the ICAV and its investors (for example, applicable anti-money laundering and counter terrorist financing legislation), disclosing data to tax authorities (such as the Irish

Revenue Commissioners), other competent authorities, courts and law enforcement agencies where required or requested to do so and taking steps to protect our rights and those of our investors. More specifically, we typically perform compliance checks on an ongoing basis, complete reporting requirements, meet recording-keeping requirements, satisfy disclosure requirements, takes steps to investigate and prevent fraud and other crime and act to protect our rights and those of our investors, as appropriate. .

4. **REASON(S) (LEGAL BASE(S)) FOR COLLECTING AND USING YOUR PERSONAL DATA**

We typically collect and use personal data for the purposes outlined in section 3 above on the basis that it is:

- (a) necessary in order to comply with legal or regulatory obligations under certain laws – for example where we carry out certain regulatory compliance checks and make certain regulatory disclosures as referred to in section 3 above;
- (b) necessary for the purposes of our legitimate interest and those of third parties or regulatory bodies. Where your personal data is processed on this basis, we ensure that there is a fair balance between these legitimate interests (as described below) and your rights.

Our “legitimate interests” for processing personal data include:

- (i) the processing purposes described in section 3 of this Notice in circumstances where such processing is not necessary to comply with legal obligations under certain laws;
 - (ii) working with regulators and other competent authorities to ensure that we meet their requirements and satisfy applicable laws; and
 - (iii) exercising our fundamental rights and freedoms, including the freedom to conduct a business and the right to property.
- (c) necessary to perform contractual obligations that we owe to you or to take pre-contractual steps at your request;
 - (d) in limited circumstances and to the extent the legal bases for processing set out above do not apply, processed with your consent (which may be obtained from you from time to time).

To the extent that we process any special categories of data relating to you for any of the purposes outlined in section 2, we will do so because either: (1) you have given us your explicit consent to process that data; (2) the processing is necessary for reasons of substantial public interest on the basis of applicable law (for example where we are required by law or regulatory requirements to process that information in order to ensure that we meet our anti-money laundering obligations); (3) the processing is necessary to carry out our obligations under employment, social security or social protection law; (4) the processing is necessary for the establishment, exercise or defence of legal claims; or (5) you have made the information manifestly public. The legal grounds for processing special categories of data outlined above at (1) to (5) appear at Articles 9(2)(a), 9(2)(g), 9(2)(b), 9(2)(f) and 9(2)(e) of the European Union’s General Data Protection Regulation ((EU) 2016/679) respectively.

5. SHARING PERSONAL DATA

In connection with one or more of the purposes outlined in section 2 above, we generally disclose personal data to:

- (a) other members of our group of companies (including our subsidiaries, parent companies and other affiliates) and our business partners;
- (b) suppliers of IT systems, technology and support;
- (c) providers of services and other functions in relation to the ICAV and our operations (including any transfer agent, registrar, fund administrator (currently J.P. Morgan Hedge Fund Services (Ireland) Limited), depository, custodian, paying agent, auditor, and legal and other professional adviser);
- (d) suppliers of IT systems, technology, support and other services;
- (e) persons acting as your delegate, agent, sub-contractor or service provider (including any investment adviser, discretionary investment manager, distributor, platform or other intermediary, auditor, and legal and other professional adviser) and any other person you involve in connection with the ICAV;
- (f) lawyers, auditors, valuers, accountants, advisers, consultants and others acting on our behalf or providing professional advice;
- (g) judicial bodies, rating agencies, and relevant governmental, regulatory, supervisory, law enforcement, prosecuting, tax or similar authority or industry body under applicable laws or regulations of any relevant jurisdiction;
- (h) prospective purchasers and assignees in the event our respective businesses or group, or any part thereof, is sold or re-organised, and if we sell all or substantially all of the ICAV's assets, personal data held by us will be one of the transferred assets;
- (i) any other person or entity that it is customary, necessary or advisable in furtherance of the processing purposes in section 2 or to whom we are obliged by applicable law or regulation to make the disclosure; and
- (j) any other party, where you have given your consent to do so.

6. INTERNATIONAL TRANSFER

Please note that some of the recipients of your personal data referenced in section 5 above will be based outside of the EEA in countries whose laws may or may not provide the same level of data protection as within the EEA. We implement appropriate safety measures to protect your personal data and transfer your personal data to these countries in compliance with applicable data protection laws. Where required by applicable data protection laws, we make sure that recipients of your personal data sign standard contractual clauses approved by the European Commission or other supervisory authority with relevant jurisdiction. You can obtain more information on the mechanisms we use to lawfully transfer your personal information outside the EEA by contacting us through the contact details on page 1 of this Notice. You can also find the contractual terms currently approved by the European Commission for transferring personal information outside of the EEA at: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en

7. YOUR RIGHTS

You have the following rights in respect of your personal data:

- 7.1 **Information and Access:** You have the right to be provided with certain information about our use and collection of your personal data and access to that data (subject to exceptions).
- 7.2 **Changes to Your Information:** You have the right to request that any inaccurate or incomplete personal data is updated or corrected.
- 7.3 **Deletion:** You have the right to require that your data be deleted in certain circumstances, including where it is no longer necessary for us to use this data
- 7.4 **Data Portability:** Where your personal data is processed on the basis of your consent, or where such processing is necessary in connection with a contract to which you are a party, you may have the right to have the data transferred to you or another controller in a structured, commonly used and machine-readable format, where this is technically feasible.
- 7.5 **Right to Object to Certain Data Collection and Use:** Where your personal data is processed for a legitimate interest described in this Notice, we must ensure there is a fair balance between these interest and your rights. If you disagree with your personal data being processed in this manner you have the right to object to such use.
- 7.6 **Right to Restrict the Collection and Use of Your Personal Data:** You have the right to restrict processing of your personal data in certain circumstances, including while your request for data rectification or objection to personal data processing is being considered, if we no longer need to use your data but you need that data in connection with a legal claim. If this right applies, we will continue to store your data but will only further process it with your consent, for the establishment, exercise or defence of legal claims, to protect the rights of another person, or for reasons of important public interest.
- 7.7 **Right to Withdraw Consent:** If we require your consent to process any of your personal data, this will be requested from you separately. To the extent that we rely upon your consent to process your personal data, you have the right to notify us that you no longer give your consent to such processing at any time.
- 7.8 **Complaint:** You also have the right to lodge a complaint with a data protection supervisory authority, in particular in your country of residence. The contact details for your data protection supervisory authority, the Office of the Data Protection Commission, are: info@dataprotection.ie.

These rights will be exercisable subject to limitations as provided for under data protection laws and any other applicable laws and regulation. If you wish to exercise any of these rights, you may do so by contacting us using the contact details set out on page 1 of this Notice. Where you are requesting further information and/or access, you should also send a copy of your passport (or another valid type of photographic identification) with your request so that we can verify your identity.

8. KEEPING PERSONAL DATA

We retain your personal data for as long as is necessary to fulfil the purpose for which it was collected or to comply with legal, regulatory or internal policy requirements. In general, this means that we retain investors' personal data for the duration of their investment in the ICAV

and thereafter we retain and delete such personal data in accordance with the ICAV's legal and regulatory obligations and the ICAV's Record Retention, Archiving and Retrievability Policy.

9. **UPDATES TO THIS NOTICE**

The information in this Notice may change from time to time – for example, the types of personal data that we collect, the reasons for which it is used and the ways in which it is shared may change. Any material changes to the processing of personal data described in this Notice which affects you will be communicated to you through an appropriate channel.