

Privacy Policy

East Rock Capital, LLC and its affiliates (collectively, “East Rock”, “we”, “our”, or “us”) understand that privacy is important to users of our websites. This Privacy Policy discloses our practices regarding information collection and usage at www.eastrockcap.com, and any of our other websites where this Privacy Policy appears (collectively, the “Websites”). This Privacy Policy does not apply to any other websites, applications, or services provided by us or our affiliates, unless it appears on such website, application, or service.

For clarity, this Privacy Policy does not apply to the information we collect from our investors. If you are an investor with East Rock, please see our Privacy Notice separately distributed to you in connection with your investment to understand how we handle information we collect about our investors.

Accessibility: If you are having any trouble accessing this Privacy Policy or the Websites, please contact us at 212-630-5000 between 9am and 5pm Eastern Standard Time or email legal@eastrockcap.com.

BY USING OR ACCESSING THE WEBSITES, YOU AGREE TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE WITH OUR POLICIES OR PRACTICES, YOU SHOULD NOT USE OR ACCESS THE WEBSITES OR PROVIDE US WITH ANY PERSONAL INFORMATION.

EastRock

LAST UPDATED AND EFFECTIVE AS OF: AUGUST 4, 2024
CONFIDENTIAL AND FOR DISCUSSION PURPOSES ONLY

Information We Collect

As used in this Privacy Policy, "Personal Information" is information that reasonably identifies, relates to, describes, or can be associated with you. Data that has been de-identified or that otherwise cannot reasonably be related back to a specific person is not considered Personal Information. The Personal Information we collect about you can be provided directly by you to us if you have an account with us, or by contacting us or through other means on our Websites. Categories of Personal Information we collect directly from you on our Websites include:

- Personal Identifiers, which includes your contact information such as your name, email address, phone number, or mailing address.

When you use our Websites, we may also collect certain other types of information that do not specifically identify you but may nonetheless be considered "personal information" under applicable U.S. state laws. This includes information such as:

- Device and Online identifiers, such as internet protocol (IP) address, cookie identifiers and similar device identifiers.
- Internet or other electronic network activity information, which includes clickstream data, technical data, and usage data, device and operating system used to access the Websites, information about how you use our Websites including the pages viewed, browsing history, and time spent on our Websites.
- IP Geolocation Data.

We collect this information automatically and indirectly through the use of our cookies and other tracking technologies. For more information on cookies and trackers, please see the sections titled "Cookies and other Tracking Technologies" and "Clickstream Data".

Cookies and other Tracking Technologies

We or our third-party partners may store some information on your device or device hard drive as a "cookie" or similar type of file (such as clear gifs, web beacons, tags, and similar technologies that work on mobile devices) to collect online identifiers and internet or other electronic network activity information for the purpose of facilitating and enhancing your communication and interaction with the Websites. Such data may include, without limitation, the address of the websites you visited before and after you visited the Websites, the type of browser you are using, your Internet Protocol (IP) address, what pages in the Websites you visit, and what links you clicked on. We use this information to help us maintain and enhance the efficiency and usefulness of the Websites and may use it and other non-Personal Information for the purposes described in this Privacy Policy. Please note that some of this information may include data, such as IP address data or the identifiers associated with your device that are unique to your computer or device. If you want to stop or restrict the placement of cookies or flush any cookies that may already be on your computer or device, please refer to the Opt-Out of Cookies section below.

Clickstream Data

As you use the Internet, a trail of electronic information is left at each website you visit. This information, which is sometimes referred to as "clickstream data," can be collected and stored by a website's server. Clickstream data can tell us the type of device and browsing software you use and the address of the website from which you linked to the Website. We may collect and use clickstream data to anonymously determine how much time visitors spend on websites, how visitors navigate throughout websites and how we may tailor our services to better meet consumer needs. This information will be used to improve our services.

Analytics

We may work with third-party vendors who use the technologies described in this section to conduct website analytics to help us track

and understand how visitors use our Websites. One such provider is Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help analyze how users use the Websites. The information generated by these cookies about your use (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Websites, compiling reports on activity for its staff, and providing other services relating to web page activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. You may refuse the use of cookies by selecting the appropriate settings in your browser. By using the Websites and accepting cookies, you consent to the processing of data about you by Google in the manner and for the purposes set out above. Please refer to the currently available optouts for Google Analytics by visiting <https://tools.google.com/dlpage/gaoptout/>. You may obtain additional information about Google Analytics by visiting the section titled "How Google uses information from sites or apps that use our services," located at www.google.com/policies/privacy/partners/.

Use of Your Information

We will only use your Personal Information as described herein:

- We will use your information to operate our Websites.
- We may use your information to respond to your direct inquiries.
- We may permit our vendors and subcontractors to access your information in connection with performing services for us.
- To provide you with notices about your accounts.
- To provide you with information, products, or services that you request from us.
- We may disclose your information as required by law or legal process.
- We may disclose your information to investigate suspected fraud, harassment or other violations of any law, rule or regulation, or the policies for the Websites.
- We may disclose your information in connection with a bankruptcy proceeding or the sale, merger or change of control of East Rock or the division responsible for the services with which your information is associated.

Please note that if you specifically consent to additional uses of your Personal Information, we may use your Personal Information in a manner consistent with that consent.

We may also aggregate information collected from our users (such as the number of users in a particular region or having particular characteristics) and use such aggregated information in any lawful manner.

Disclosure or Sharing of Your Information

In addition to using your personal information ourselves for the reasons stated above (and as otherwise mentioned in this Privacy Policy), we may disclose your Personal Information to other affiliates and entities in the following instances:

Service Providers

We may share your Personal Information with third-party service providers who may use your information to provide us with services. These service providers may have access to Personal Information that is necessary to perform their functions, but they are only permitted to do so in connection with performing services for us. They are not authorized by us to use the information for their own benefit.

Corporate Affiliates

We may share Personal Information with our corporate affiliates and subsidiaries, who process Personal Information on our behalf.

Business Partners

We may share your Personal Information with third parties who partner with us to conduct data analytics or use the data for other commercial purposes. We do not control how these third parties use and share your Personal Information once they receive it. You will need to contact such third parties directly for information about their privacy practices or to exercise any rights you may have.

Legal Compliance and to Defend Our Rights

We may disclose Personal Information and other information as we believe necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our [Terms of Use](#); (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you, or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

Business Transfers

We may share your Personal Information and other information with third parties in connection with a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the assets of East Rock, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which the assets transferred may include information about the users of the Websites.

Non-Personal Information

We may share non-Personal Information with unaffiliated third parties, such as business and advertising partners, to improve and enhance your experience using the Websites, and for our own market research activities. We publicly commit to maintain and use such information in de-identified or aggregate form, and not to attempt to re-identify the information.

Third-Party Links

As a convenience to you, we may provide links to third-party websites, apps or services from within the Websites. We are not responsible for the privacy practices or content of these third-party sites, and by providing a link we are not endorsing or promoting such third-party sites. When you link away from our Website, you do so at your own risk. We encourage you to read the policies and terms of every website, app or service you visit.

Your Choices

Cookies

If you want to stop or restrict the placement of cookies or flush any cookies that may already be on your computer or device, please refer to and adjust your web-browser preferences. Further information on cookies is available at www.allaboutcookies.org. By deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our Websites or some of its functionality may be affected.

Do Not Track

Please note that we do not respond to or honor “do not track” (a/k/a/ DNT) signals or similar mechanisms transmitted by web browsers. However, if you are a resident of California, Colorado, Connecticut, or other states with similar laws, we treat certain opt-out preference signals (i.e. Global Privacy Controls) as a means of opting out of the sale or sharing of Personal Information, or of opting out of the processing of Personal Information for targeted advertising, as applicable. Please see the section *Additional U.S. State Privacy Rights* below for more information.

Data Security

Although we strive to protect your Personal Information, East Rock cannot ensure or warrant the security of any information you provide or transmit to us, and you do so at your own risk. In the event of a breach of the confidentiality or security of your Personal Information, we will attempt to notify you as soon as reasonably practicable so you can take appropriate protective steps. If you have consented to our using electronic communications or electronic delivery of statements, we may notify you under such circumstances using the most current email address you have on record with us.

Data Retention

We will retain your information for as long as your account or inquiry is active or as needed to provide you with the Website and for a reasonable time thereafter in accordance with our standard procedures or as necessary to comply with our legal obligations, to resolve disputes, and to enforce our agreements. Even if we delete some or all of your Personal Information, we may continue to retain and use aggregate or anonymous data previously collected and/or anonymize or aggregate your Personal Information. Please note that we will not be liable for disclosures of your data due to errors or unauthorized acts of third parties.

Nevada Privacy Rights

If you are a Nevada resident, you have the right to request that we do not sell (as defined by N.R.S. 603A) certain Personal Information that we have collected, or may collect, from you. We do not “sell” your Personal Information as defined by N.R.S. 603A. However, if you would like to make such a request you may do so by contacting us at legal@eastrockcap.com.

Information Relating to Children

We do not knowingly collect Personal Information from anyone under the age of 18. If we are made aware that we have received such information, or any information in violation of our policy, we will use reasonable efforts to locate and remove that information from our records.

Privacy Policy Updates

We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time. However, if at any time in the future we plan to use Personal Information in a way that materially differs from this Privacy Policy, we will post such changes here. We encourage you to periodically review this Privacy Policy for the latest information on our privacy practices.

Location

Our Websites are maintained in the United States of America. By using the Websites, you freely and specifically give us your consent to export your Personal Information to the USA and to store and use it in the USA as specified in this Privacy Policy. You understand that data stored in the USA may be subject to lawful requests by the courts or law-enforcement authorities in the USA.

Contact

For questions or concerns relating to this Privacy Policy or your Personal Information, we can be contacted at: legal@eastrockcap.com.

ADDITIONAL U.S. STATE PRIVACY RIGHTS

If you are a resident of California, Virginia, Colorado, Connecticut, Utah, Texas, Oregon, or Montana or another state with a similar comprehensive consumer privacy law (collectively, "Covered States"), you may have specific rights regarding your Personal Information under the California Consumer Privacy Act ("CCPA"), Virginia Consumer Data Protection Act, Colorado Privacy Act, Connecticut Data Privacy Act, Utah Consumer Privacy Act, Texas Data Privacy and Security Act, Oregon Consumer Privacy Act, Montana Consumer Data Privacy Act, and similar laws in other U.S. states (collectively, "State Privacy Laws"). This section describes the rights that consumers of Covered States have and explains how to exercise those rights. To be clear, these rights are granted (i) to the extent that East Rock is not otherwise exempt from applicable State Privacy Laws and (ii) only to the extent that you are considered a consumer of a Covered State, and East Rock is acting as a "controller" or "business" (as applicable) under State Privacy Laws with respect to your Personal Information.

The categories of Personal Information we process, our purposes for processing your Personal Information, the categories of Personal Information we share with third parties, and the categories of third parties with whom we share it are set forth in the terms of the Privacy Policy above.

Information We Collect; How We Collect It; How We Use It

General information regarding our collection, use, and disclosure of Personal Information is set forth in the Privacy Policy above. In the past 12 months, we have collected categories of Personal Information described in the section of the Privacy Policy above titled *Information We Collect*, and we have collected this information from the sources described in the section titled *Information We Collect*. Depending on your level of interaction with us, we may not have collected your Personal Information from all of the categories listed in the Privacy Policy above. We collect and use your Personal Information for the business or commercial purposes described in the section titled *Use of Your Information*, and retain it pursuant to the section titled *Data Retention*. We disclose the following categories of Personal Information for business or commercial purposes to the categories of recipients listed below:

- Identifiers and contact information: We disclose this information to service providers who perform business services for us.
- Device information and unique identifiers: We disclose this information to service providers who perform business services for us; and third parties, such as analytics networks.
- Internet or other electronic network activity information: We disclose this information to service providers who perform business services for us; and third parties, such as analytics networks.

Rights to Your Information

In addition to the rights set forth in our Privacy Policy, State Privacy Laws may, depending on your state of residence, provide you with the following rights:

- Right to Know. You may have the right to know whether we process your Personal Information and to access such Personal Information. You may also have the right to request that we disclose certain information to you about our collection, use, or disclosure of your Personal Information.
- Right to Data Portability. You may have the right to obtain a copy of your Personal Information that you previously provided to us in a portable and, to the extent technically feasible, readily usable format that allows you to transmit the data to another business without hindrance, where the processing is carried out by automated means.

- Right to Delete. You may have the right to delete Personal Information that you have provided to us or that we have obtained about you. Please note that we may deny such request if the requested deletion falls under an exception as set forth in the State Privacy Laws.
- Right to Correct. You may have the right to correct inaccuracies in your Personal Information, taking into account the nature of the Personal Information and the purposes for which we process it.
- Right to Opt-Out. You have the right to opt out of the processing of your Personal Information for purposes of: (i) targeted advertising; (ii) the sale of Personal Information; or (iii) profiling in furtherance of decisions that produce legal or similarly significant effects concerning you. As of the latest date of the Privacy Policy:
 - o We process Personal Information or share it with third parties for the purposes of targeted advertising;
 - o We sell your Personal Information in exchange for monetary or other valuable consideration; and
 - o We do not engage in profiling decisions based on your Personal Information that produce legal or similarly significant effects concerning you.

To opt out of the sale or sharing of your Personal Information, please visit the page "Do Not Sell or Share My Personal Information". For residents of California, Colorado, and Connecticut and elsewhere when required by State Privacy Laws, we will also treat certain opt-out preference signals (i.e. Global Privacy Controls) as valid opt-out requests. We do not sell or share the Personal Information of consumers we actually know are less than 16 years of age, unless we receive affirmative authorization (the "right to opt-in") from either the consumer who is less than 16 (but greater than 13) years of age, or the parent or guardian of a consumer less than 13 years of age. To our knowledge, we do not sell or share the Personal Information of minors under 16 years of age.

- Right to Non-discrimination. You have the right not to receive discriminatory treatment by us for the exercise of your privacy rights. Unless permitted by the State Privacy Laws, we will not:
 - o Deny you goods or services;
 - o Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
 - o Provide you a different level or quality of goods or services; or
 - o Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

How to Exercise Your Rights; Verifying Your Identity

To exercise any of your privacy rights, or if you have any questions about your privacy rights, you may contact us by calling 212-630-5000 between 9:00 AM and 5:00 PM ET or emailing legal@eastrockcap.com.

After submitting a request, we will take steps to verify your identity in order for us to properly respond and confirm that it is not a fraudulent request. In order to verify your identity, we will ask, at a minimum, that you provide your name and email address so that we can seek to match this information with the information existing in our systems. When providing us this information, you represent and affirm that all information provided is true and accurate. If we are unable to verify that the consumer submitting the request is the same individual about whom we have collected Personal Information, we may contact you for more information, or we may not be able to meet your request.

Only you, or an agent legally authorized to act on your behalf, may make a verifiable request related to your personal information. If you are making a request as the authorized agent of a consumer, we will

ask you also to submit reliable proof that you have been authorized in writing by the consumer to act on such consumer's behalf. If you are making a request as the parent or legal guardian of a known child regarding the processing of that child's Personal Information, we may ask you to submit reliable proof of your identity.

Response Time; Your Right to Appeal

We will make every effort to respond to your request within 45 days from when you contacted us. If you have a complex request, State Privacy Laws allow us up to 90 days to respond. We will contact you within 45 days from when you contacted us to inform you of the need for additional time and the reason for such extension. We may charge you a reasonable fee to cover administrative costs if your requests are manifestly unfounded, excessive, or repetitive.

If we decline to take action on a request that you have submitted, we will inform you of our reasons for doing so, and provide instructions for how to appeal the decision. Depending on your state of residence you may have the right to appeal within a reasonable period of time after you have received our decision. If you have this appeal right, within 60 days (45 days for residents of Colorado) of our receipt of your appeal, we will inform you in writing of any action taken or not taken in response to the appeal, including a written explanation of the reasons for the decisions. If we deny your appeal, we will provide you with a method for contacting your state attorney general's office to submit a complaint.

California "Shine the Light"

In addition to the above rights, under California Civil Code Section 1798.83 ("Shine the Light"), California residents may have the right to request in writing from businesses with whom they have an established business relationship: (a) a list of the categories of Personal Information, as defined under Shine the Light, such as name, email address, and mailing address, and the type of services provided to the customer that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties' direct marketing purposes; and (b) the names and addresses of all such third parties. However, as of the effective date of this Privacy Policy, we have not shared Personal Information with any third party for its direct marketing purposes.

EastRock

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