



CALIFORNIA CONSUMER PRIVACY NOTICE

Last Updated: January 2021

Introduction

As a valued partner of the Shenkman Group of Companies, your privacy is very important to us. This notice (this "California Consumer Privacy Notice") is provided by the Shenkman Group of Companies, and their affiliates (collectively the "Shenkman Group"), as well as mutual funds, private funds (single investor or commingled), Collateralized Loan Obligations ("CLOs"), and UCITS funds managed by the Shenkman Group (each, a "Sponsored Fund" and, collectively "Sponsored Funds").

This California Consumer Privacy Notice contains disclosures required by the California Consumer Privacy Act ("CCPA"), is only relevant to residents of California, and applies only to the collection or other use of "personal information" that is subject to the CCPA. Consumers with disabilities may access this notice by clicking [here](#).

References to "you", "your", "investor", or "client" in this California Consumer Privacy Notice mean any resident of California. References to, "we", "us", or "our" in this Privacy Notice mean a Sponsored Fund or the Shenkman Group, as applicable. The Shenkman Group includes Shenkman Capital Management, Inc., Shenkman Capital Management Ltd, Romark Credit Advisors LP, Romark CLO Advisors LLC, and their affiliates. Capitalized terms used but not defined herein have the meanings assigned to them in the Form ADV Part 2A of Shenkman Capital Management, Inc., or of Romark Credit Advisors LP, as applicable, each of which may be supplemented, updated or modified from time-to-time.

Personal Information We Collect

In the past 12 months, we may have collected, without limitation, the following categories of personal information about you:

- Identifiers, such as your real name, alias, email address, postal address, Internet Protocol (IP) address, account name, Social Security number, driver's license number, passport number, or other similar personal identifiers;
- Other personal information categories (as listed in the California Customer Records statute), such as your signature, physical characteristics or description, telephone number, insurance policy number, education, employment, employment history, bank account number or any other financial information, medical information, or health insurance information;
- Protected classification characteristics under California or federal law, such as your age, race, citizenship, marital status, gender, or veteran or military status;
- Commercial information, such as your account activity, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies;
- Biometric information, such as your fingerprints, faceprints, voiceprints, and iris or retina scans;
- Internet or other similar network activity, such as information regarding your interaction with our website, online portal, or other applications;
- Sensory data, such as recordings of your audio (e.g., voicemails);



- Professional or employment-related information, such as your current or past job history or performance evaluations;
- Non-public education information, such as your education records maintained by an educational institution or party acting on its behalf; and
- Inferences drawn from other personal information, such as a profile reflecting your preferences, characteristics, trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We do not knowingly collect, solicit or sell personal information from anyone under the age of 16.

Sources of Personal Information We Collect

We primarily collect personal information from the following categories of sources:

- Your communications with us;
- Service providers, including, but not limited to, administrators, lenders, banks, trading counterparties, auditors, law firms, consultants, placement agents, employment agencies and recruiters, and background check providers;
- Affiliates not under the Shenkman Group brand;
- Nonprofit organizations; and
- Government entities.

Use of Personal Information

We may use the personal information we collect for one or more of the following purposes:

- Providing you with information about our products and services;
- Providing performance and other updates;
- One or more of the following business purposes:
 - Performing services (for us or our service provider) such as account servicing, processing orders and payments, and analytics;
 - Auditing related to our interactions with you (e.g., counting ad impressions to unique visitors, verifying positioning/quality of ad impressions, and auditing compliance, etc.);
 - Legal compliance;
 - Internal operations;
 - Activities to maintain and improve our services; and
- Other commercial purposes, including, but not limited to, activities that are directed to advancing commercial or economic interests, such as inducing a person to buy, rent, lease, join, subscribe to, provide or exchange products or services, or enabling or effecting a commercial transaction.

Sharing Personal Information.

We may disclose personal information in one or more of the categories identified above to:

- Service providers, including but not limited to, administrators, lenders, banks, trading counterparties, auditors, law firms, consultants, placement agents, employment agencies and recruiters, and background check providers;



- Affiliates;
- Business partners;
- Legal or government regulatory authorities as required by applicable law; and
- In connection with a potential business transfer.

In the past 12 months, we have not sold any personal information we collect to third parties, and we have shared the categories of personal information we collect only as set forth above.

Rights of California Consumers

The CCPA provides a California consumer the following rights, subject to certain exceptions and limitations:

- The right to request (a) the categories and specific pieces of personal information we collect, use, disclose, and sell about you, (b) the categories of sources from which we collected your personal information, (c) our purposes for collecting or selling your personal information, (d) the categories of your personal information (if any) that we have either sold or disclosed for a business purpose, and (e) the categories of third parties with which we have shared personal information;
- For certain categories of personal information, the right to request a list of what personal information (if any) we disclosed to third parties for their own direct marketing purposes in the past 12 months and the names and addresses of those third parties;
- The right to request that we delete the personal information we have collected from you or maintain about you;
- The right to opt out of our sale(s) (if any) of your personal information; and
- The right not to receive discriminatory treatment for the exercise of the privacy rights conferred by the CCPA.

You may submit requests to exercise your rights under the CCPA to our Chief Compliance Officer at DataProtection@shenkmancapital.com or at (212) 867-9090.

We may need to request additional information from you to verify your identity or understand the scope of your request. In verifying requests, we will require you to provide, at a minimum your mailing address and telephone number to verify your identity. If we are unable to verify your identity, we will need to deny your request.

You may designate an authorized agent to make a CCPA request on your behalf. In such case, we will ask the agent to provide proof that you have given the agent signed permission to act on your behalf. In addition, we will ask you to either (1) verify your identity directly with us in the manner described above or (2) directly confirm with us that you have provided the agent permission to make the request on your behalf.

Revisions to Our Privacy Policies

The Shenkman Group evaluates its privacy policies and procedures to implement improvements and refinements from time-to-time. The Shenkman Group reserves the right to amend the terms contained herein in whole or in part for any reason without notice to you. We therefore suggest that you review this California Consumer Privacy Notice periodically, which is available at <https://www.shenkmancapital.com/>.