



**General Data Protection Regulation ('GDPR') Privacy Notice**  
**Protecting your Personal Information for Residents of the European Union**

This Privacy Notice explains how Sound Point Capital Management, LP, Sound Point Capital Management UK, LLP and Sound Point CRE Management, LP, which are identified as Controllers (referred to collectively as "Sound Point", "we", "us", "our" or "the firm"), use personal information about individuals outside our organization with whom we interact, including, but not limited to, visitors to our website, clients and their personnel, vendors and service providers, and visitors to our offices (together "you").

Sound Point is an asset management firm with particular expertise in credit strategies and commercial real estate debt. We understand and respect the importance of your privacy and below we explain:

- I. What information we collect about you
- II. Who is collecting personal information
- III. How we will use this personal information
- IV. Marketing
- V. How personal information is stored and who it could be shared with
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**(I) What information we collect about you**

We may collect your personal information under the following circumstances:

- a. When you provide us with your personal information. For example, you may do this when you register with us on our website, contact us via email, phone, or by any other means.
- b. We collect or create personal information about you in the ordinary course of managing and administering our business relationship with you. For example, we may create records of our interactions with you and details of your accounts with us or our accounts with you which may constitute personal information.
- c. We collect personal information that you have chosen to make public. We may do this via social media to the extent that you choose to make your social media profile(s) publicly visible.
- d. We receive your personal information from third parties who provide it to us. This could, for example, be from your employer or previous employer, our clients, our service providers or relevant legal and regulatory authorities. This might also include information obtained for the purposes of our "know your client" procedures (which include anti-money laundering processes, counter-terrorist financing procedures, politically exposed persons checks, and sanctions checks), background reference checks or other due diligence procedures. Such checks may be performed on you if you are connected with our clients, counterparties, service providers, investment opportunities, or we are considering employing you or otherwise establishing a business relationship.

Subject to applicable law and regulation and in order to comply with legal obligations or carry out legitimate interests, we collect the following categories of personal information:

- a. Identity information: such as your name (and in some cases proof of your name), username or similar identifier, marital status, title, date of birth or age, gender, signature and other similar information.
- b. Personal and business contact details: such as your work or home address (and in some cases proof of address), phone, email, social media profile details and other similar information.
- c. Nationality or tax identification data: such as nationality, immigration and/or visa status, passport number(s), other government issued national identification number(s), place of birth, Green Card number(s), National Insurance number, tax residency and tax identification information, social security number(s), driving license number(s), images of passports, driving licenses or other proof of identity document(s), and other similar information.
- d. Family, life cycle and social circumstances: such as the name and contact details of next of kin, family members, emergency contact details, outside business interests, hobbies, lifestyle choices, dietary preferences and other similar information.
- e. Employment details: such as industry role, business activities, names of current and former employers, copies of your CV or resume, and other similar information.
- f. Education and qualification data: such as details of your education, professional and other qualifications, skills, experience and other similar information.
- g. Financial data: such as bank account details, tax calculations and/or returns, history of investment holdings and transactions, and other similar information.
- h. Communications data: such as copies of communications with you, information about your use of our information and communications systems (where relevant) and copies of electronic communications and voice records (where relevant) made on our systems and other similar information.
- i. Transaction data: such as details about payments to and from you, travel and other expenses and other similar information.
- j. Photos and CCTV images: such as photographs that you provide or we obtain from publicly available sources, CCTV images from our office locations and other similar information.
- k. Electronic identifying data: such as IP addresses, cookies, activity logs, and other similar information.

We do not seek to collect or use your sensitive personal information, except where:

- a. The use of this information is necessary for compliance with a legal or regulatory obligation (including anti-money laundering processes, counter-terrorist financing procedures, politically exposed persons checks, and sanctions checks);
- b. The use of this information is necessary for the detection or prevention of crime (including the prevention of fraud) to the extent permitted by applicable law or regulation;
- c. You have made such sensitive personal information public;
- d. The use of this information is necessary for the establishment, exercise or defense of legal rights;
- e. The use of this information is necessary for reasons of substantial public interest and occurs on the basis of an applicable law and regulation that is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your fundamental rights and interests; and
- f. We have in accordance with applicable law and regulation, obtained your explicit consent prior to using your sensitive personal information.



**Criminal Activity:** We will only process and report any criminal activities to the extent required or permitted by applicable law or regulation.

**(II) Who is collecting data**

Your personal information will be collected by the following Data Controllers:

<b>Controller Entity</b>	<b>Address / Telephone Number/ Email Address</b>
Sound Point Capital Management, LP	375 Park Avenue, 33 <sup>rd</sup> Floor, New York NY 10152 (212) 895-2280 / <a href="mailto:gdpr@soundpointcap.com">gdpr@soundpointcap.com</a>
Sound Point CRE Management, LP	375 Park Avenue, 33 <sup>rd</sup> Floor, New York NY 10152 (212) 895-2280 / <a href="mailto:gdpr@soundpointcap.com">gdpr@soundpointcap.com</a>
Sound Point Capital Management UK LLP	1 <sup>st</sup> Floor, 48 Dover Street, London W1S 4FF United Kingdom +44 2036557836 / <a href="mailto:gdpr@soundpointcap.com">gdpr@soundpointcap.com</a>
Ovis Technologies:	483 Tenth Avenue, Suite 230, New York NY 10018 (646) 201-5884 / <a href="mailto:webteam@ovistechnologies.com">webteam@ovistechnologies.com</a>

The GDPR contact of Sound Point’s Cybersecurity Taskforce is Monica Cheng who can be contacted by the following methods:

- a. Email: [gdpr@soundpointcap.com](mailto:gdpr@soundpointcap.com),
- b. Telephone: (212) 895-2269

All written communications should be directed to:

GDPR Compliance  
Sound Point Capital Management, LP  
375 Park Avenue, 33<sup>rd</sup> Floor  
New York, NY 10152

**(III) How we will use your personal information**

We will use your personal information for the following purposes:

- a. To fulfil our regulatory and legal obligations relating to the prevention of money laundering, anti-bribery, fraud prevention, counter-terrorist financing, politically exposed persons checks, sanctions checks and any other “know your client” checks. We may use third party services, such as the Administrators of the Sound Point funds or third party screening services providers.
- b. To onboard new business relationships and comply with our internal policies and procedures.
- c. To enable us to effectively carry out our function as investment manager.
- d. To provide products and services you have requested, including providing you with any information relating to such products or services, and respond to any comments you may send us.
- e. To enable us to efficiently manage our relationship with you, keeping our records up to date, maintaining records of services provided and our interactions with you, including responding to any complaints we may receive from you and to seek to resolve these.



- f. To enable us to manage how we work with other companies that provide services to us, the funds we manage and the investors in our funds.
- g. To assist in the development of new products and services.
- h. To effectively operate our audit, compliance controls and other risk management functions.
- i. To comply with our legal and regulatory obligations.
- j. To detect, investigate, and prevent breaches of internal and regulatory policies and criminal offenses in accordance with applicable law and regulation.
- k. To detect, prevent, and investigate fraud and potential fraudulent activity.
- l. To establish, exercise or defend our legal rights.
- m. To provide physical security of our premises (including records of visits to our premises), and electronic security (including login records and access details, where you access our electronic systems).
- n. To provide you with information concerning the Sound Point funds, new fund launches and related information
- o. To determine your suitability to be granted access to this website or your eligibility for investment in the Sound Point funds.

#### **(IV) Marketing**

We would like to send you information about new funds or updates for existing funds which may be of interest to you. If you have consented to receive marketing information, you can opt out at a later date. You have a right at any time to stop us from contacting you for marketing purposes. If you no longer wish to be contacted for marketing purposes you can opt out at any time by sending us an e-mail at this address: [gdpr@soundpointcap.com](mailto:gdpr@soundpointcap.com).

#### **(V) How data is stored and with whom it could be shared**

Your personal information is recorded on paper and IT systems. Basic personal information will be stored on our relationship management system and it is only accessible to employees in our Business Development and Investor Relations departments for the above-mentioned purposes.

Your personal information may reside on shared IT systems and it is only accessible to employees in our Business Development, Investor Relations, and Legal and Compliance departments.

Due to the international nature of this website and the nature of Sound Point's activities and the service providers that we use, your personal information may be transferred and stored in countries outside of the EU, as permitted under the General Data Protection Regulation (GDPR), Article 45 (Transfers on the basis of an adequacy decision), Article 46 (Transfers subject to appropriate safeguards), Article 47 (Binding corporate rules), Article 48 (Transfers or disclosures not authorized by Union law) and Article 49 (Derogations for specific situations).

In addition, we may disclose your personal information in accordance with applicable law and regulation to:

- a. Governmental, legal, regulatory, tax or similar authorities, ombudsmen, central and/or local government agencies, and/or law enforcement officials (if mandated by law and regulation or if required for the protection of our legitimate interests);
- b. Anti-fraud services in relation to data on known or suspected fraudulent activity;
- c. Third party service providers (such as payment services providers and banks);
- d. Third parties to whom you request us to send your personal information;
- e. Our professional advisers (such as our auditors, accountants, and lawyers);
- f. Any relevant party, claimant, law enforcement agency or court, to the extent necessary, for the establishment, exercise or defence of legal rights in accordance with applicable law and regulation;
- g. Any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including safeguarding against and the prevention of threats to public security in accordance with applicable law and regulation;
- h. To any relevant party in connection with our anti-money laundering, anti-bribery, anti-fraud or “know your client” requirements (including third party service providers which carry out sanctions checks on our behalf). Such service providers may also keep personal information which we provide, or which you provide to them directly, in order for them to provide identity verification services to other organisations.

We do not share your personal information with others for marketing purposes unless you agree to this.

Without prejudice to any communications made to comply with legal or contractual obligations, data may also be disclosed to external parties as required by laws or regulations (e.g. court, tribunal, Regulatory Authority or Governmental Entity).

When we share your information with third party services providers, we take all reasonable steps to ensure that your personal information and privacy are protected in line with the applicable legal obligations.

Your personal information will be stored indefinitely from our last successful contact with you or until your consent is withdrawn.

#### **(VI) Your rights and how to exercise them**

You have a number of legal rights in relation to the personal information that is held about you by us. You have the right to obtain certain information regarding the use of the personal information and to access your personal information. If your personal information is inaccurate or incomplete, you have the right to request corrections to it. In certain circumstances, you have the right to receive your personal information in a structured, commonly used and machine-readable format.

You have the right to ask us to transfer some of your personal information to other organizations, where this is technically feasible. You have the right to ask us to erase or “restrict” your personal information in some circumstances. Where we use your personal information because it is in our or a third party’s legitimate interests, then you may object to this usage.

Where we have asked for your consent to process your personal information, you may withdraw your consent at any time. If you withdraw your consent, this will not affect the lawfulness of any of the usage which we have already carried out.

If you consider that the use of your personal information infringes applicable data protection laws, as a data subject you have the right, without prejudice, to any other administrative or judicial remedy, to lodge



a complaint with a supervisory authority, in particular, in the Member State of your habitual residence, place of work, or place of the alleged infringement.

You can contact us to exercise your rights by emailing us at [gdpr@soundpointcap.com](mailto:gdpr@soundpointcap.com) or directly contacting our firm's GDPR contact, Monica Cheng, at (212) 895-2269.

**(VII) Cookies**

We may collect information about your computer, including your Browser type, operating system, and web logs, which has an Internet Protocol (IP) address in it. This information is not tied to the user and this information is not analysed.

We only use cookies (small text files stored in your browser) for the website administrator and not any of the registered users. These cookies are session based, which means they only exist whilst visitors are online on a particular occasion. These temporary cookies aid the user's journey around the website and remember the preferences selected during the session.

For further information on cookies, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org) where you can also find information on how to turn them off.

**(VIII) Other websites**

This Privacy Notice applies only to this website and does not regulate the privacy practices of third party websites which are linked to this website.

**(IX) Changes to this Privacy Policy**

This Privacy Notice may be updated from time to time. Please regularly check our website at [www.soundpointcap.com](http://www.soundpointcap.com) to review any updates we might make to reflect changes in our practices or changes in applicable law and regulation. This policy was last updated on 25 May 2018.