



## SOUND POINT GLOBAL PRIVACY NOTICE

Effective Date: August 19, 2024

This Privacy Notice (“Notice”) describes how Sound Point Capital Management, LP, Sound Point Capital Management UK, LLP, and Sound Point CRE Management, LP (collectively, “Sound Point”, “we”, “us”, or “our”), may process personal data about individuals located outside of the United States, including residents of the United Kingdom and Europe. Sound Point is the data controller of personal data we process about you.

This Notice supplements our other privacy policies and notices, including our **Online Privacy Policy**. In the event of a conflict between any other policy, statement, or notice and this Notice, this Notice will prevail as to data subjects located outside the United States.

U.S. investors and other financial services clients, customers, and potential clients should review **Sound Point’s Financial Privacy Notice**, which governs how we collect, use and share your nonpublic personal information while delivering financial products or services to you.

Residents of California should review **Sound Point’s California Privacy Notice**, provided in accordance with the California Consumer Privacy Act.

Our **Online Privacy Policy**, **Financial Privacy Notice** and **California Privacy Notice** can be found on [www.soundpointcap.com](http://www.soundpointcap.com)

### PERSONAL DATA WE COLLECT

We may collect the following types of personal data directly from you, automatically when you visit our websites, or from our service providers or third parties, depending on how you interact with us:

- **Identification and personal characteristics**, such as your name, unique personal identifier, marital status, date of birth or age, gender, signature and other similar information;
- **Contact information**, such as your e-mail address, phone number, fax number, and postal address;
- **Account and financial information**, such as your username, login and password, bank account details, credit card number, debit card number, tax calculations and/or returns, investment and transaction data, and other financial information;
- **Nationality or tax identification data**, such as your nationality, tax residency and tax identification information, immigration and/or visa status, passport number(s), government issued national identification number(s), and other proof of identity document(s);
- **Internet or other electronic network activity information**, such as your IP address, online identifier, browsing history, search history, interaction with our websites, application logs, device data and registration, social media account information or advertisement, usage preferences, links from websites or advertisements that refer you to our websites, and information collected from cookies and other tracking technologies;
- **Communications with us**, such as information you provide to us in e-mail, through online forms, and on the telephone;
- **Audio and Visual Recordings**, such as recordings from video calls and CCTV images from our office locations; and

- **Professional or employment-related information**, such as your occupation; title; company; and information processed as part of the recruitment process, including information included in a CV or cover letter.

## HOW WE USE PERSONAL DATA

The purposes for which we may collect, store, use, and otherwise process personal data about you and our lawful bases for processing this personal data are set out below.

We may use your personal data to:

- Provide services to you, including fulfilling requests related to your personal data and onboarding new business.
- Manage our relationship with you, including keeping our records up to date, maintaining records of services provided and our interactions with you, and responding to and seeking to resolve any complaints we may receive.
- Facilitate communications with you, including notifying you of features or special events, providing information about our products and services and our business partners services, inviting you to participate in our events or surveys, and providing you with other information we feel may be of interest to you.
- Operate our business, including developing new products and services; operating our audit, compliance controls and other risk management functions; and enabling us to work with companies that provide services to us, the funds we manage, and the investors in our funds.
- Provide access to, customize, analyze, adjust, secure and improve our websites and services.
- Fulfill 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.
- Prevent, investigate, identify, or otherwise take action regarding suspected or actual fraudulent or illegal activity, or any activity that violates or may violate applicable laws, regulations, or legal process and our policies.
- Comply with applicable laws, regulations, or legal processes, as well as industry standards and our company policies.
- Evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of our assets in which personal data held by us is among the assets transferred.

We process your personal data for certain legal bases, subject to applicable law, including when:

- The processing is necessary for us to perform our contract with you or allow you to enter into a contract with us, including to provide you with the products and services you request, respond to your inquiries, process your job application, or otherwise fulfill our contractual obligations to you.
- We have a legal obligation to process your personal data, or we reasonably believe that it is necessary to protect our rights or the rights of another or to comply with judicial or regulatory proceedings, a court order, or other legal process.
- We have a legitimate interest in processing your personal data. In particular, we have a legitimate interest to: promote our products and services, grow our business, and provide information about our services and product offerings; limit access to information to appropriate persons and enable investors to access confidential information securely; analyze

and improve the safety and security of our websites, business, products, and services, including by implementing and enhancing security measures and safeguards and protecting against fraud, spam, and other abuse; otherwise maintain and improve our website, products, and services; and operate our business and provide you with information and communications about our products and services that are tailored to, and in accordance with, your preferences.

- You have consented to our processing of your personal data. Where we have asked for your consent to process your personal data, you may withdraw your consent at any time. To withdraw your consent, please contact us at [gdpr@soundpointcap.com](mailto:gdpr@soundpointcap.com). Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose(s) to which you originally consented unless we have an alternative legal basis for doing so.

## **DISCLOSURE OF PERSONAL DATA**

We may disclose your personal data to:

- Our affiliates, including our subsidiaries and strategic business partners, who may use your information for purposes similar to the purposes for which we collect such information.
- Service providers and contractors that we retain to perform services on our behalf, including financial service providers, such as administrators, placement agents and prime brokers, who assist Sound Point as part of the ordinary course of servicing investment; marketing companies; customer support specialists; web hosting companies; fulfillment companies, such as companies that coordinate mailings; data analysis firms; and e-mail service providers.
- Professional advisers, including counsel, accountants and auditors, and persons acting in a fiduciary or representative capacity, such as an IRA custodian or trustee.
- Third parties if we believe disclosure is reasonably necessary to comply with any applicable law, regulation, legal process or governmental request and enforce our agreements and policies.
- Service providers, contractors, and third parties to protect the security or integrity of the Sites or our services and products; to protect ourselves, our customers, or the public from harm or illegal activities; or to respond to an emergency which we believe in good faith requires us to disclose data to assist in preventing a death or serious bodily injury.
- Third parties in connection with a sale, merger, liquidation, dissolution, or sale or transfer of any portion of the assets of Sound Point, including negotiations of such transaction.

## **COOKIES AND TRACKING TECHNOLOGIES**

We may use cookies and other types of tracking technologies (collectively, “**Cookies**”) on our websites, as described in our Online Privacy Policy.

## **MARKETING**

We may use your personal data to contact you with newsletters, marketing or promotional materials, and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in e-mails we send. We may use e-mail marketing service providers to manage and send e-mails to you.

## HOW LONG WE MAINTAIN YOUR PERSONAL DATA

We maintain the categories of personal data described above for as long as is necessary for the purposes described in this Notice or otherwise authorized by law. We generally keep the personal data for as long as one of the following apply: your personal data is reasonably necessary to manage our operations, to manage your relationship with us, or to satisfy another purpose for which we collected the information; your personal data is reasonably necessary to carry out a disclosed purpose that is reasonably compatible with the context in which the personal data was collected; your personal data is reasonably required to protect or defend our rights or property; or we are otherwise required or permitted to keep your personal data by applicable laws or regulations.

Where personal data is used for more than one purpose, we will retain it until the purpose with the latest period expires. For more information about our retention policies, please contact us using the contact details below.

## YOUR RIGHTS AND HOW TO EXERCISE THEM

You may have certain legal rights in relation to the personal data that is held about you by us. Subject to applicable law in your country of residence, you may have the right to:

- Request access to your personal data (commonly known as a data subject access request) and request certain information about our personal data processing.
- Request correction of your personal data.
- Request that we restrict our processing of your personal data.
- Request the deletion of your personal data.
- Object to our processing of your personal data.
- Request the transfer of your personal data to another party.

You can contact us to exercise your rights by e-mailing us at [gdpr@soundpointcap.com](mailto:gdpr@soundpointcap.com) or calling us at 1-833-217-6665.

If you believe that we have violated any of your data protection rights, you may contact us or make a complaint with your data protection authority.

## EXTERNAL WEBSITES

Our websites may contain links to third-party websites. Please be aware that we cannot control and are not responsible for the information collection practices of such websites, which may differ from those of Sound Point. We encourage you to review and understand the privacy policies of these websites before providing any information to them.

## TRANSFER OF PERSONAL DATA

Due to the international nature of this website, the nature of Sound Point's activities, and the services providers that we use, your personal data may be transferred to, stored, and processed in jurisdictions other than your country of residence, including the United States. The data protection laws of these jurisdictions might not be the same as those in your country. When we transfer personal data across international borders, we transfer the personal data to parties that provide appropriate safeguards for your personal data in accordance with applicable law, including through the use of

valid personal data transfer mechanisms. If you would like further information about how we transfer your personal data, you can contact us at the information listed in the Contact Us section below.

## CHANGES TO THIS NOTICE

This Notice may change from time to time. Amendments will be indicated by the Effective Date at the beginning of this Notice.

## CONTACT US

For additional information about this Notice, please contact us at:

ATTN: Andrea Sayago / Compliance  
Sound Point Capital Management, LP  
375 Park Avenue, 34<sup>th</sup> Floor  
New York, NY 10152

E-mail: [gdpr@soundpointcap.com](mailto:gdpr@soundpointcap.com)  
Telephone: 1-833-217-6665

Your personal data may be processed by the following Data Controllers, depending on the nature of your relationship with Sound Point:

- **Sound Point Capital Management UK LLP**  
103 Cannon Street, 1<sup>st</sup> Floor, London EC4N 5AG, United Kingdom  
+1(212) 895-2280 or 1-833-217-6665  
[gdpr@soundpointcap.com](mailto:gdpr@soundpointcap.com)
- **Sound Point Capital Management, LP**  
375 Park Avenue, 34<sup>th</sup> Floor, New York NY 10152  
(212) 895-2280 or 1-833-217-6665  
[gdpr@soundpointcap.com](mailto:gdpr@soundpointcap.com)
- **Sound Point Commercial Real Estate Finance LLC**  
375 Park Avenue, 34<sup>th</sup> Floor, New York NY 10152  
(212) 895-2280 or 1-833-217-6665  
[gdpr@soundpointcap.com](mailto:gdpr@soundpointcap.com)
- **Sound Point CLO C-MOA, LLC**  
375 Park Avenue, 34<sup>th</sup> Floor, New York NY 10152  
(212) 895-2280 or 1-833-217-6665  
[gdpr@soundpointcap.com](mailto:gdpr@soundpointcap.com)
- **Sound Point Luna LLC**  
375 Park Avenue, 34<sup>th</sup> Floor, New York NY 10152  
(212) 895-2280 or 1-833-217-6665  
[gdpr@soundpointcap.com](mailto:gdpr@soundpointcap.com)
- **Sound Point Meridian Management Company LLC**  
375 Park Avenue, 34<sup>th</sup> Floor, New York NY 10152

(212) 895-2280 or 1-833-217-6665

[gdpr@soundpointcap.com](mailto:gdpr@soundpointcap.com)

- **BlueMountain Fuji Management, LLC**  
375 Park Avenue, 34<sup>th</sup> Floor, New York NY 10152  
(212) 895-2280 or 1-833-217-6665  
[gdpr@soundpointcap.com](mailto:gdpr@soundpointcap.com)
- **Sound Point CRE Management, LP**  
375 Park Avenue, 34<sup>th</sup> Floor, New York NY 10152  
(212) 895-2280 or 1-833-217-6665  
[gdpr@soundpointcap.com](mailto:gdpr@soundpointcap.com)
- **SPCRE Inpoint Advisors, LLC**  
375 Park Avenue, 34<sup>th</sup> Floor, New York NY 10152  
(212) 895-2280 or 1-833-217-6665  
[gdpr@soundpointcap.com](mailto:gdpr@soundpointcap.com)