



PRIVACY NOTICE

Your privacy is very important to us. This Privacy Notice sets out Capitala Finance Corp. (“Capitala”), Capitala Investment Advisors, LLC (the “Adviser”), and Capitala Private Advisors, LLC (together with the Adviser, the “Advisers,” and collectively, “our,” “us,” or “we”) policies with respect to personal information we collect and process (“Notice”). This Notice applies to clients, investors, prospective and former clients and investors, as well as to visitors to our website and applicants for employment with us. This Notice was written with simplicity and clarity in mind. We are pleased to provide any further information or explanation if needed.

This Notice is outlined to address the specific sections set out below. This Notice is also available at <https://investor.capitalagroup.com/corporate-governance>. Please read carefully to understand our views and practices regarding your personal information and how we will treat it.

1. Data Controller
2. Information We May Collect
3. Sharing your personal information
4. Retention of your personal information
5. Your rights regarding your personal information
6. Submitting Requests
7. Cookies
8. Data Security
9. Do Not Track Signals
10. Children
11. Changes to this Notice
12. Questions

The Advisers are located at: 4201 Congress Street, Suite 360, Charlotte, NC 28209.

1. Data Controller

To the extent the GDPR applies, and for other data privacy laws with a data controller requirement, the Advisers are the data controller that direct the purposes for which your personal information is processed. As a business or controller, we will use personal information about you only for the purposes and in the manner set forth below, which describes the steps we take to ensure the processing of personal information complies with applicable data protection laws, including California’s Consumer Privacy Act (“CCPA”) and the European Union’s General Data Protection Regulation (“GDPR”).

2. Information We May Collect

We may collect personal information from a number of sources, including:

- when you provide, or provided, personal information to us in correspondence (including when you open an investment) and conversations
- publicly available and accessible directories and sources
- recruiters for the purpose of considering applicants for employment
- governmental and nongovernmental regulatory authorities to whom we have regulatory obligations
- when you execute transactions or provide transaction documentation
- fraud prevention and detection agencies and organizations
- credit agencies

The personal information we may collect, the basis of processing and the purposes of processing are detailed below. For EU/UK data subjects, and to the extent the GDPR applies, we have a lawful basis under the GDPR for each of our processing activities.

What We May Collect	Why Do We Collect It	Lawful Basis
Name, address, postal and email address, phone number, Social Security Number or other Tax ID Number, driver's license number, employment information, wire instructions, financial information and other information used to determine accredited/qualified investor status	To open and administer your investment	<p>As is necessary to take action at your request prior to entering into a contract (e.g., to respond to your queries and to provide you with further information) or where you have submitted an application to become our client/investor to verify your creditworthiness.</p> <p>As is necessary to enter into or perform our contractual obligations to you (e.g., to administer, manage and set up your investment, or to facilitate the transfer of funds, and administering and facilitating any other transaction).</p> <p>As is necessary to comply with our legal and regulatory obligations (e.g., to verify the identity and address of our clients/investors, maintain statutory registers, comply with the U.S. Office of Foreign Assets Control (OFAC) list and other governmental sanction lists, to prevent and detect fraud, to maintain the integrity and security of our systems, to carry out audit checks, conduct surveillance and investigations and comply with lawful requests).</p> <p>It is also in our valid interest to manage our risk and monitor and improve our relationship with you, both of which are not outweighed by the privacy impacts on you.</p> <p>If you are an applicant for employment, we use this information to set up and administer your application.</p>
Name, email address, postal address	To provide you with, and inform you about, our investment products and services and keep you updated.	It is in our valid interest to keep you up to date on the performance of the funds for which you are an investor and on our latest offerings and investment opportunities.

For California Residents

The personal information about you that we may collect includes information within the below categories of data. These categories also represent the categories of personal information that we have collected over the past 12 months. We collect this information as per section 2 above, and we share this information as per section 3 below.

Note that the categories listed below are defined by California state law. Inclusion of a category in the list below indicates only that, depending on the services and products we provide you, we may collect some information within that category. It does not necessarily mean that we collect all information listed in a particular category for all of our clients/investors.

Categories of Data We May Collect	Purpose of Collection
<p>Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, internet protocol address, email address, account name, social security number, driver's license number, passport number or other similar identifiers</p>	<p>As is necessary to perform our obligations to you to administer, manage and set up your investment and to facilitate the transfer of funds, and administering and facilitating any other transactions.</p> <p>As is necessary for compliance with an applicable legal or regulatory obligation which we are subject; to verify the identity and addresses of our clients/investors (and, if applicable their beneficial owners); comply with requests from regulatory, governmental, tax and law enforcement authorities; maintain statutory registers; prevent and detect fraud; comply with the OFAC list and other governmental sanctions lists; carry out audit checks and conduct surveillance and investigations.</p> <p>As is necessary to address or investigate any complaints, claims, proceedings or disputes; to provide you with, and inform you about, our investment products and services; monitor and improve our relationships with clients/investors; send direct marketing communications to you; manage our risk and operations; comply with our audit requirements; assist with internal compliance with our policies and process; ensure appropriate group management and governance; to maintain the integrity and security of our systems; enable any actual or proposed assignee or transferee, participant or sub-participant of the partnership's or our rights or obligations; to evaluate proposed transactions; analyze and manage commercial risks; monitor communications to/from us using our systems; and facilitate business asset transactions.</p> <p>If you are an applicant for employment, we use this information to set up and administer your application.</p>
<p>Information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, your name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, wire transfer information, or any other financial information, such as the amount invested and details of the investment made.</p>	<p>As is necessary to perform our obligations to you to administer, manage and set up your investment and to facilitate the transfer of funds, and administering and facilitating any other transactions.</p> <p>As is necessary for compliance with an applicable legal or regulatory obligation which we are subject; to verify the identity and addresses of our clients/investors or potential clients/investors (and, if applicable their beneficial owners); comply with requests from regulatory, governmental, tax and law enforcement authorities; maintain statutory registers; prevent and detect fraud; comply with the OFAC list and other governmental sanctions lists; carry out audit checks and conduct surveillance and investigations.</p>

Professional or employment-related information	As is necessary to perform our obligations to you to administer, manage and set up your investment. If you are an applicant for employment, we use this information to set up and administer your application.
Characteristics of classes protected under federal or California law, including: familial status, disability, sex, national origin, religion, color, race, sexual orientation, gender identity and gender expression, marital status, veteran status, medical condition, ancestry, source of income, and/or age.	If you are an applicant for employment, we use this information to set up and administer your application, including to provide any reasonable accommodations you may require.
Internet or other electronic network activity information, including, but not limited to: browsing history, search history, and other information regarding a consumer's interaction with our internet website.	To optimize performance of our websites, provide products and services to our clients/investors, and to audit our interactions with our clients/investors and potential clients/investors. Examples of visitor data analytics provided: pages visited, how long visitors stay on, browser used, operating system used, access device (mobile vs. desktop) and time of day.

3. Sharing your personal information

We may share your personal information with certain service providers such as our accountants, attorneys, auditors, transfer agents and brokers, in each case for our everyday business purposes, such as to facilitate the administration of the funds for which you are invested and mail information to you, or as otherwise permitted by applicable law. As part of our legitimate interest, we may share in order to manage any proposed sale, restructuring, transfer or merging of any or all part(s) of our business, including to respond to queries from the prospective buyer or merging organization.

We will take reasonably necessary steps to ensure that where personal information is shared, it is treated securely and in accordance with this Notice and applicable laws. We require our service providers to provide written assurances regarding the security and privacy protections they have in place to protect any personal information transferred or disclosed to them, as well as their compliance with our security requirements and any applicable laws and regulations.

We do not, and will not, sell personal information to third parties, as that term is defined by California law, nor have we done so in the past 12 months. In addition, we do not share personal information with third parties for their direct marketing purposes.

4. Retention of your personal information

As a general principle, we do not retain your personal information for longer than we need it. We keep your personal information only for as long as it is required to provide our services, perform our contractual obligations, or to meet our statutory or regulatory requirements. We typically delete personal information about you at least 6 years after you are no longer our client/investor.

5. Your rights regarding your personal information

Depending on where you live, your current jurisdiction and applicable data protection laws, and subject to any relevant restrictions/exemption, you may be entitled to certain rights with regards to our processing of your

personal information. (Please note depending on the country you live in and the applicable data protection laws, you may only have access to some of the rights listed below).

Privacy Rights under GLBA

In general, to the extent we received, obtained, or generated information about you in connection with providing a financial service or product within the United States, your rights with respect to that information are generally governed by the Gramm-Leach-Bliley Act (GLBA).

Your rights under the California Consumer Privacy Act (“CCPA”)

To the extent we have collected information about you that is not governed by the GLBA or FCRA, you may have the rights described below with respect to personal information about you, residents of California may have certain data protection rights under CCPA relating to certain personal information, including:

- **Right of access** – You may be entitled to request that we disclose the categories and specific pieces of personal information that we have collected about you, the categories of sources from which the information was collected, the purposes of collecting the information, the categories of third parties we have shared the information with, and the categories of personal information that have been shared with third parties for a business purpose.
- **Right to “opt-out” of a sale of personal information** – if our business practices change and we sell personal information you will be provided with notice and be given the opportunity to opt out of the sale of your personal information.
- **Right of data portability** – In some instances, you may have the right to receive the information about you in a portable and readily usable format. Before providing this information, we must be able to verify your identity akin to the request.
- **Right to have personal information erased** – Subject to certain conditions, you may be entitled to request that we delete personal information that we hold. We will not delete personal information about you when the information is required to fulfill a legal obligation, is necessary to exercise or defend legal claims, or where we are required or permitted to retain the information by law. For example, we cannot delete information about you while continuing manage your account or investment. Data solely retained for data backup purposes is principally excluded.

You may also appoint an authorized agent to make a request on your behalf.

Your GDPR rights

- Data subjects of the EU/UK may have certain data protection rights, including:
- the right to access your personal data
- the right to restrict the use of your personal data
- the right to have incomplete or inaccurate data corrected
- the right to ask us to stop processing your personal data
- the right to require us to delete your personal data in some limited circumstances
- the right to object to processing of your personal data where that processing is carried out for our legitimate interest or for direct marketing
- the right in some circumstances to request for us to “port” your personal data in a portable, re-usable format to other organizations (where this is possible)

- the right to lodge a complaint about the processing of your personal data with your local data protection authority
- the right to request information, with respect to our practices within the 12 months prior to your request, regarding the specific personal data we have collected from you, the sources from which we obtained it, the purposes for which we collected, used and shared the personal data and the categories of third parties with whom we have shared it

You may exercise your right to make these requests/objections by sending us an email at IR@capitalagroup.com at any time if you wish to do so.

For a listing of EU Privacy Regulators, please click here: https://edpb.europa.eu/about-edpb/board/members_en

6. Submitting Requests

To exercise your rights to request information or the deletion of your personal information, please send us an email at IR@capitalagroup.com at any time if you wish to do so.

Before providing information requests in accordance with your rights, we must be able to verify your identity. In order to verify identity, you will need to submit information about yourself, including, to the extent applicable, government identification number and date of birth. We will match this information against information we have previously collected about you to verify your identity and request. To the extent you maintain an account with us, we will require you to login to that account as part of submitting the request. If we are unable to verify your identity as part of the request, we will not be able to satisfy the request. We are not obligated to collect additional information to enable you to verify identity. For deletion requests, you will be required to submit a verifiable request for deletion and then to confirm separately the personal information to be deleted.

Please note that under California law, we are only obligated to respond to personal information requests from the same consumer up to two times in a 12-month period. Under both EU and California law, if an individual makes unfounded, repetitive, or excessive requests (as determined in our reasonable discretion) to access personal data, we may charge a fee subject to a maximum set by law.

If you would like to appoint an authorized agent to make a request on your behalf, you must provide the agent with written, signed permission to submit privacy right requests on your behalf, or provide a letter from your attorney. The agent or attorney must provide this authorization at the time of request. We may require you to verify your identity with us directly before we provide any requested information to your approved agent. Information collected for purposes of verifying your request will only be used for verification.

If you chose to exercise any of these rights, to the extent that they apply, U.S. state law prohibits us from discriminating against you on the basis of choosing to exercise your privacy rights. We may, however, charge a different rate or provide a different level of service to the extent permitted by law.

7. Cookies

A cookie is a small piece of data that a website asks your browser to store on your computer or mobile device. The cookie allows the website to “remember” your actions or preferences over time. Cookies are widely used in order to make websites work, or to work more efficiently, as well as to provide reporting information. Some cookies are strictly necessary for the functioning of our website.

Why do we use cookies?

We use cookies to learn how you interact with our content and to improve your experience when visiting our website. For example, some cookies remember your preferences and where you left off so that you do not have to repeatedly make these choices when you visit one of our websites.

What types of cookies do we use?

Third-party cookies belong to and are managed by other parties, such as Google Analytics. These cookies may be required to render certain forms, such as email list sign-up, or to allow for some advertising outside of our main website. Session cookies are temporary cookies that are used to remember you during the course of your visit to the website, and they expire when you close the web browser. Persistent cookies are used to remember your preferences within the website and remain on your desktop or mobile device even after you close your browser or restart your computer. We use these cookies to analyze user behavior to establish visit patterns so that we can improve our website functionality for you and others who visit our website.

In addition to our main website, we also have our investor website that is hosted by Nasdaq and their policy on cookies is available upon request. The information we collect is used to analyze the usage of the website and/or to provide a service, such as signing up for an alert.

How do I reject and delete cookies?

You can choose to reject or block all or specific types of cookies by changing your browser settings. Please note that most browsers automatically accept cookies. Therefore, if you do not wish cookies to be used, you may need to actively delete or block the cookies. If you reject the use of cookies, you will still be able to visit our websites but some of the functions may not work correctly. You may also visit www.allaboutcookies.org for details on how to delete or reject cookies and for further information on cookies generally. By using our website without deleting or rejecting some or all cookies, you agree that we can place those cookies that you have not deleted or rejected on your device.

Third-party cookies used on our main website:

Cookie	Type	Duration	Description
XSRF-TOKEN	Necessary	30 minutes	This cookie is set by the custom Echo website platform and is used for security purposes.
_ga	Analytics	2 years	This cookie is installed by Google Analytics. The cookie is used to calculate visitor, session, campaign data and keep track of site usage for the site's analytics report. The cookies store information anonymously and assign a randomly generated number to identify unique visitors.
_gid	Analytics	1 day	This cookie is installed by Google Analytics. The cookie is used to store information of how visitors use a website and helps in creating an analytics report of how the website is doing. The data collected including the number visitors, the source where they have come from, and the pages visited in an anonymous form.
_gat	Performance	1 minute	This cookie is installed by Google Universal Analytics to throttle the request rate to limit the collection of data on high traffic sites.

8. Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the website.

9. Do Not Track Signals

Various third parties are developing or have developed signals or other mechanisms for the expression of consumer choice regarding the collection of information about an individual consumer's online activities over time and across third-party website or online services (e.g., browser does not track signals). Currently, we do not monitor or take any action with respect to these signals or other mechanisms.

10. Children

We do not offer financial services and products to minors and do not knowingly collect personal information from children under the age of 16. We will delete any personal information we determine to have been collected from a child or user under the applicable age of consent. If you are a parent or guardian of a child under the relevant digital age of consent and believe he or she has disclosed personal information to us, please send us an email at IR@capitalagroup.com.

11. Changes to this Notice

We may change this Notice at any time. It is our policy to post any updates we make to this Notice to our website. If we make material changes to how we treat personal information, we will notify you by email, if applicable, to the email address specified for your account. The date this Notice was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our website and this Notice to check for any changes.

12. Questions

If you have any questions regarding this Notice or the treatment of your non-public personal information, please send us an email at IR@capitalagroup.com.

Last Updated: February 2021