

Octagon Privacy Notice

FACTS	WHAT DOES OCTAGON CREDIT INVESTORS, LLC (“OCI”) DO WITH YOUR PERSONAL INFORMATION?	
Why?	Financial companies choose how they share your personal information. United States federal law (“federal law”) gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do under federal law.	
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> • Name, address, social security number and income • Financial status, assets, net worth, wire instructions, transaction information, including capital account balances, distributions and other account information 	
How?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons OCI chooses to share; and whether you can limit this sharing.	
Reasons we can share your personal information	Does OCI Share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you	Yes	No
For joint marketing with other financial companies	No	N/A
For our affiliates’ everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates’ everyday business purposes – information about your creditworthiness	No	N/A
For our affiliates to market to you	No	N/A
For nonaffiliates to market to you	No	N/A
Additional Information	<p>Please note: If you are a <i>new</i> customer, we can begin sharing your information 30 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing.</p> <p>Individuals in the European Economic Area (“EEA”) and United Kingdom (“UK”) have certain rights regarding their personal data under the EU and UK General Data Protection Regulation (“GDPR”). Consumers in California have certain rights regarding their personal information under the California Consumer Privacy Act (“CCPA”) and California Privacy Rights Act (“CPRA”). Investors in Cayman Islands based funds managed by OCI have certain rights regarding their personal information under the Cayman Islands Data Protection Law (“DPL”). OCI maintains an additional GDPR Privacy Notice, California Privacy Notice, and, on behalf of Cayman Islands funds, a DPL Privacy Notice applicable to the respective individuals and consumers, available on OCI’s website or by contacting us.</p>	
Questions?	Please contact OCI’s Chief Compliance Officer by calling the toll-free number 888-266-6464 and following the menu instructions to reach Margaret Julian or by contacting Octagon directly at 212-400-8400.	

Who we are	
Who is providing this notice?	Octagon Credit Investors, LLC
What we do	
How does OCI protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings. We maintain physical, electronic, and procedural safeguards to store and secure information about you from unauthorized access, alteration and destruction.
How does OCI collect my personal information?	We collect your personal information, for example, when you: <ul style="list-style-type: none"> • Sign subscription documents, and other related documentation • Contribute to or withdraw from your account
Why can't I limit all sharing?	Federal law gives you the right to limit only: <ul style="list-style-type: none"> • Sharing for affiliates' everyday business purposes – information about your creditworthiness • Affiliates from using your information to market to you • Sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>
Definitions	
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> • Our affiliates include companies that utilize the name "Conning," such as Conning & Company, Conning, Inc., Conning Investment Products, Inc.; companies that use the name "Cathay," such as Cathay Life Insurance Co., Ltd; Goodwin Capital Advisers, Inc. and Global Evolution USA, LLC.
Non-affiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market joint financial products or services to you.
Other important information	
Privacy information is available on OCI's website: https://octagoncredit.com/privacy-notice	