



GLOBAL PRIVACY STATEMENT 2026

Octagon Credit Investors, LLC (“Octagon” or “we”) provides this privacy statement (this “Privacy Statement”) on behalf of itself and any CLOs, funds or separately managed accounts that it advises (each, an “Account”).

We endeavor to ensure that your personal data is handled in accordance with data privacy laws, including: (i) the European Union (“EU”) and the United Kingdom (“UK”) General Data Protection Regulation (as amended); (ii) the UK Data Protection Act 2018 (as amended); (iii) the EU Privacy and Electronic Communications Directive as implemented in EEA member states and the UK Privacy and Electronic Communications (EC Directive) Regulations 2003 (as amended); and (iv) all similar or related legislation applicable in any jurisdiction with which Octagon is required to comply from time to time. To the extent the foregoing laws apply to you, this Privacy Statement explains how we collect, use, share and protect your personal data (as defined below).

As used in this Privacy Statement:

“controller”	means the entity that determines the purposes and means of the processing of personal data.
“criminal offenses data”	means personal data relating to criminal convictions and offences.
“EEA”	means the European Economic Area.
“personal data”	means any information relating to an identified or identifiable natural person.
“processing”	means anything that is done with personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
“processor”	means the person or entity that processes personal data on behalf of a data controller.
“sensitive personal data”	means criminal offences data and/or special categories of personal data.
“special categories of personal data”	means personal data about an individual’s race or ethnicity, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, or sexual orientation.



With respect to your personal data, the Octagon is a data controller.

- We “control” the personal data that you have provided, including making sure that it is kept secure;
- We make certain decisions on how to use and protect your personal data, but only to the extent that we have informed you about the use or are otherwise permitted by law.

How Do We Collect Personal Data?

We collect personal data from information that you give to us (e.g., from forms and questionnaires, correspondence or conversations and transactions with us) as well as from information that we obtain from other sources such as: from your use of our website or our investor portal; from publicly available or accessible directories, databases and subscriptions; bankruptcy registers; tax authorities; credit agencies; law firms; accounting firms; other advisors; fraud prevention and detection agencies and other similar organizations. We may also combine information that we have about you from various sources, including the information that you have provided to us.

What Personal Data Do We Collect?

While the types of personal data we collect will depend on whether you are an institutional investor or an individual investor, our legal obligations and the type of investment services that we provide, personal data collected in relation to an investment in the Account can generally be expected to include:

- personal details - such as your name (including name prefix or title), age, place and date of birth, nationality and relationship to a person, business and home telephone details, residential address, business and/or personal e-mail address(es), position and place of work, emergency contact information, signature and photograph;
- government issued identifiers - such as passport, identification card, driving license, taxpayer identification number and national insurance number;
- financial and tax information - such as financial qualifications for subscription, bank account details into which distributions are to be paid, tax identification number(s) and self-certification forms for tax reporting purposes;
- investment information - such as source of wealth, (and if applicable, employment information, education history and income) invested amounts and holdings in the Fund, investment history and risk adversity;
- technical information – such as
 - information about the device you use to interact with us (including the unique device identifier, hardware model, operating system and version and mobile network information),
 - information, such as your IP address, from your visits to our website and
 - if applicable, sensitive personal data, such as data relating to a politically exposed person, or data relating to a disqualifying event.



While we do not generally seek to collect or process sensitive personal data, we may do so when there is a lawful basis for doing so such as when:

- it is necessary to comply with a legal obligation;
- it is necessary for the detection or prevention of a crime; or
- you have made such sensitive personal data manifestly public.

Why Do We Process Personal Data?

We process your personal data if necessary:

- **For the performance of a contract**
 - to provide investor on-boarding related services;
 - to administer and manage your subscription and, once admitted to the Account, to contact you to make capital calls, report on the performance and governance of the Account, to make payments or distributions and all other matters contemplated by or relevant to your rights and interests as a limited partner;
 - to meet contractual obligations that we have to you; and
 - generally to administer and attend to the affairs of the Account as an open-ended investment fund.
- **To comply with our legal obligations**
 - fulfill our legal, regulatory and compliance obligations, including identity verification, know your client (KYC), terrorist financing, anti-money laundering and sanctions checks
 - conduct the management of the Account in accordance with applicable laws, which may require, e.g., engaging an administrator, custodian, depositary, paying agent or other service providers;
 - comply with requests from regulatory, governmental, tax and law enforcement authorities;
 - maintain physical and electronic security of our premises and electronic systems and carry out related surveillance and investigations; and
 - prevent, detect and investigate breaches of policy and criminal activity.
- **To pursue our legitimate interests or those of a third party, except where such interests are overridden by your interests, fundamental rights or freedoms**
 - manage and administer your investments and accounts;
 - comply with our internal compliance requirements, policies, procedures and protocols and to maintain our books and records;
 - conduct credit and financial due diligence;
 - facilitate investments, including related financings;
 - communicate with you, which may include making you aware of related investment or co- investment opportunities or similar arrangements;
 - assess and process any requests made by you;



- address or investigate any complaints, claims, proceedings, or disputes;
- monitor and improve our relationships with investors;
- comply with our legal obligations;
- manage our legal, operational, financial, commercial and investment risks;
- comply with our accounting and tax reporting requirements, including audit requirements;
- ensure appropriate group management and governance;
- detect and protect against crimes;
- seek professional advice, including legal, accounting and other advice; and
- protect the physical security of our premises and monitor and maintain the security of our IT systems.

How Do We Share Personal Data?

We may share your personal data, as appropriate, with:

- Other members of Octagon providing services on our behalf;
- Your agents, your advisors and your representatives;
- Other limited partners or investors in our Accounts;
- Our service providers, including administrators, custodians, depositories and consultants;
- Any lenders to the Account evaluating the credit-worthiness of the limited partners;
- Our professional advisors, including accountants, auditors, attorneys, banks, brokers, financial advisors, tax advisors, other outside professional advisors and third-party processors;
- Governmental, legal, regulatory, law enforcement, or similar authorities, upon request or where required;
- Anti-fraud services, credit reference agencies, debt-collection agencies and tracing agencies;
- Any relevant party in connection with our legal, regulatory and compliance obligations, including identity verification, know your client (KYC), terrorist financing, anti-money laundering and sanctions checks; and
- Any relevant third party acquirer(s), in the event that we sell or transfer all or any relevant portion of the Account in which you are an investor

Is It Necessary to Provide Personal Data?

To the extent that you do not provide relevant personal data to us, we may not be able to comply with our legal, regulatory, or compliance obligations or perform our contracts with you. As a result, this may affect our ability to process your subscription to the Account and otherwise to maintain our business relationship with you.

Will Personal Data Be Transferred Outside of UK/EEA?

Octagon is based in the United States. The personal data you provide to us will be received by us in the United States and stored on cloud-based servers maintained by our third-party providers. We take reasonable steps to protect your personal data from unauthorized access and against unlawful



processing, accidental loss, destruction and damage. Where we receive your personal data directly in the United States, we are not responsible for its transfer outside the EEA. If we were to receive your personal data in the context of an establishment in the EEA, the UK or a country with similar data privacy laws, we would ensure that it will be transferred to a country outside the EEA (or UK, or the country with similar data privacy laws, as applicable) pursuant to an appropriate data transfer agreement. Were any transfer to take place under such an agreement, you would have the right to request a copy of that contract by contacting Octagon.

Additional Rights Under California Law

If you are an individual resident in California, the California Consumer Privacy Act (“CCPA”) and the California Privacy Rights Act (“CPRA”) may apply with respect to your personal information. Please be aware that Octagon collects relatively limited amounts of consumer personal information subject to the CCPA/PRA because the personal information we obtain is largely exempted from CCPA/CPRA as personal financial data subject to the Gramm-Leach-Bliley Act or Fair Credit Reporting Act. However, you may have a right to: (i) request to know information about the categories or specific pieces of personal information we collect about you, as well as our use and disclosure of that information; (ii) request the deletion or correction of the personal information we collect about you; and (iii) the right to limit our use of sensitive personal information. In the last 12 months, Octagon has collected and disclosed the categories of personal information described above for the business purposes described above. Although California residents may have the right to opt out of the sale and sharing of personal information, Octagon does not “sell” or “share” such terms are defined under the CCPA/CPRA) personal information about investors to third parties and we have not sold or shared investors’ personal information in the last 12 months.

Individuals who wish to exercise any of the rights described above may be required to verify their identity before we proceed with the request. We will not disclose or delete any information until the individual’s identity is verified. Investors may designate an authorized agent to submit a request on their behalf by providing the agent with their written permission. If an agent makes a request on an investor’s behalf, they will be required to verify the request by submitting the investor’s written authorization and we may still ask that the investor verify their identity with us before we can proceed with the request. We will not honor any requests from agents until authorization is verified. To make a request, please contact us at the contact information below. We will maintain records of consumer requests made under the CCPA and how we responded to those requests in accordance with CCPA/CPRA.

California’s “Shine the Light” law permits California residents to annually request and obtain information, free of charge, about what personal information is disclosed to third parties for direct marketing purposes in the calendar year. Octagon does not distribute your personal information to nonaffiliated parties for direct marketing without your consent. To make a request, please contact us at the contact information below.

We will not discriminate against individuals for exercising any of the rights describe above or any additional rights they have under applicable laws.



Additional Rights Under Cayman Islands Data Protection Act (the “DPA”)

If you are an investor in Accounts that were formed in the Cayman Islands, any transfer of personal data by us or our duly authorized affiliates and/or delegates outside of the Cayman Islands shall be in accordance with the requirements of the DPA. We and our duly authorized affiliates and/or delegates shall apply appropriate technical and organizational information security measures designed to protect against unauthorized or unlawful processing of your personal data, and against accidental loss or destruction of, or damage to, your personal data. We shall notify you of any data breach that is reasonably likely to result in a risk to the interests, fundamental rights or freedoms of either you or those data subjects to whom the relevant personal data relates.

How Long Do You Retain Personal Data?

We will retain your personal data throughout the duration of our business relationship and as long as is necessary to fulfil the purposes described above. The retention period may be extended if we are required to preserve information in connection with litigation, investigations, or proceedings, or if a longer retention period is required by applicable law, or conforms with industry best practice.

What Are My Rights with Respect to My Personal Data?

We take reasonable steps designed to ensure that any personal data we maintain is accurate and, where necessary, kept up to date. Subject to the particular data privacy laws applicable to Octagon, you may have certain data protection rights with respect to personal data controlled by us, including:

- the right to receive confirmation as to whether we have personal data concerning you and, if so, access to that personal data and information concerning the nature and processing of such personal data;
- the right to rectify or update personal data that is incomplete or inaccurate;
- the right to erase personal data in certain circumstances;
- the right to restrict the use of your personal data in certain circumstances;
- the right to ask us to stop processing your personal data in certain circumstances; and
- the right to receive your personal data in a structured, commonly used and machine-readable format and the right to request that we transmit such data to another controller, in certain circumstances.

To exercise one or more of the data protection rights set forth above, please contact us as detailed below in “Questions, Complaints, or Requests to Exercise.”

Can I Withdraw My Consent?

We will not generally rely on your consent to process your personal data. If we do, however, you may also have the legal right to withdraw this consent at any time. If you believe you have consented to processing your personal data and wish to withdraw your consent, please contact us



as detailed in “Contact Information and Complaints” below.

Business Continuity Plan

Octagon has developed and implemented a Business Continuity Plan (“BCP”) designed to address and mitigate the potential consequences of a significant business disruption (“SBD”) with a goal of recovering the key aspects of our business within twenty-four hours or less. Our BCP also is designed to safeguard employees and protect our books and records.

Octagon’s plan anticipates two kinds of SBDs, internal and external. Internal SBDs affect only the firm’s ability to communicate and do business, such as a fire in its building. External SBDs prevent the operation of the securities markets or a number of firms, such as a terrorist attack, a city flood, a global pandemic, or a wide-scale, regional disruption. Octagon’s response to an external SBD relies more heavily on other organizations and systems.

We believe that we have implemented reasonable and prudent measures to overcome or at least mitigate the consequences of an event that would otherwise interfere with the normal course of our business. However, because it is not possible to anticipate the nature, scope, impact and consequence of every possible business disruption, Octagon does not represent or guarantee that it will be able to continue or resume business operations within any specified period of time under all circumstances.

Links to Other Websites

Links on our website may take you to third party sites over which we have no control. While such links are provided for your convenience, you should be aware that the personal information handling practices of the linked websites might not be the same as ours and Octagon does not accept any responsibility or liability for these policies. You should review any privacy policies on those linked websites. This Privacy Statement does not cover the information practices of any linked websites.

Questions, Complaints, or Requests to Exercise

If you would like more information or make a complaint, please contact us:

- via email at investorrelations@octagoncredit.com
- by calling (212) 400-8400
- via written correspondence at
Octagon Credit Investors, LLC
c/o Investor Relations
250 Park Avenue, 15th Floor
New York, NY 10177



Updates to this Privacy Statement

This Privacy Statement may be amended or updated from time to time to reflected changes in our practices with respect to the processing of personal data or changes in applicable law.