

REVERE CAPITAL MANAGEMENT, LP

Notice of Privacy Policy

Client Information and Privacy Policy

Revere Capital Management, LP (“*Revere*”) has adopted procedures designed to protect all Client confidential and nonpublic information and to safeguard personal information contained in both paper and electronic records. For purposes of this Privacy Policy, the term “*Client*” includes investors in all funds and investment vehicles managed by Revere as well as borrowers/potential borrowers in relation to the origination or purchasing of loans.

I. Implementation

Revere is committed to (i) safekeeping personal information collected from potential, current and former Clients and (ii) safeguarding against the unauthorized acquisition or use of unencrypted data or encrypted electronic data regarding each Client. The proper handling of personal information is one of Revere’s highest priorities.

To this end, the CCO has been designated to implement, maintain, review and revise, as necessary, a comprehensive information security program. The primary objectives for the CCO are to identify and assess any and all reasonably foreseeable internal and external risks to the security, confidentiality and/or integrity of any electronic, paper or other records containing personal information, and to evaluate and improve, where necessary, the effectiveness of current safeguards for limiting such risks. To this end, Revere:

- conducts ongoing employee training,
- sets policy for employees relating to the storage, access and transportation of Client records and personal information,
- reviews the scope of security measures at least annually,
- reasonably monitors its information systems, including monitoring for unauthorized use or access, and
- reasonably reviews and tests electronic encryption and other elements of its computer security system (including its secure user authentication protocols, secure access control measures and system security agent software).

The CCO reviews all contractual relationships with third party service providers engaged by Revere to ensure adequate protections are in place with respect to the safeguarding of personal information.

II. Client Information

Revere collects only such information that is necessary for it to provide the services requested by its Clients and to administer its Clients’ business with Revere. For instance, Revere may collect nonpublic personal information (such as name, address, social security number, assets, income, net worth, copies of financial documents and other information deemed necessary to evaluate the Client’s financial needs) from Clients when they complete a subscription or other form. Revere may also collect nonpublic personal information from Clients or potential clients as a result of transactions with Revere, its affiliates, its Clients or others

(such information to include information received from outside vendors to complete transactions or to effect financial goals).

III. Sharing Information

Revere only shares the nonpublic personal information of its Clients with unaffiliated entities or individuals (i) as permitted by law and as required to provide services to Revere's Clients, such as with representatives within our firm, securities clearing firms, insurance companies and other services providers of Revere, or (ii) to comply with legal or regulatory requirements. Revere may also disclose nonpublic personal information to another financial services provider in connection with the transfer of an account to such financial services provider. Further, in the normal course of business, Revere may disclose information it collects about Clients to entities or individuals that contract with Revere to perform servicing functions such as recordkeeping or computer-related services. Finally, Revere may make good faith disclosure of the nonpublic personal information of its Clients to regulators who have regulatory authority over Revere.

Companies hired to provide support services to Revere are not allowed to use personal information for their own purposes and are contractually obligated to maintain strict confidentiality. When Revere provides personal information to service providers, it requires these providers to agree to safeguard such information, to use the information only for the intended purpose and to abide by applicable law.

Revere does not (x) provide personally identifiable information to mailing list vendors or solicitors for any purpose or (y) sell information relating to its Clients to any outside third parties.

IV. Employee Access to Information

Only Employees with a valid business reason have access to Clients' personal information. These Employees are educated on the importance of maintaining the confidentiality and security of such information and are required to abide by Revere's information handling practices. Revere employs reasonable procedures to prevent terminated Employees from accessing records containing personal information.

V. Protection of Information

Revere maintains security standards to protect Clients' information, whether written, spoken, or electronic. To that end, Revere restricts access to nonpublic personal information to Revere personnel who need to know such information in order to provide services to Clients. All electronic or computer files containing such information is password secured and firewall protected from access by unauthorized persons. Revere periodically updates and checks its systems to ensure the protection and integrity of information.

Revere also maintains reasonable restrictions upon physical access to records containing personal information and stores such records in secure facilities.

VI. E-mail

Should a Client send Revere a question or comment via e-mail, Revere will share the Client's correspondence only with those Employees or agents most capable of addressing the Client's question or concern. Please note that, unless expressly advised otherwise, Revere's e-mail facilities do not provide a means for completely secure and private communications.

VII. Disclosure of Privacy Policy

Revere recognizes and respects the privacy concerns of its potential, current and former Clients. Revere is committed to safeguarding this information. As a member of the financial services industry, Revere provides this Privacy Policy for informational purposes to Clients and Employees and will distribute and update it as required by law. The Privacy Policy is also available upon request.

VIII. Violations

Revere imposes reasonable disciplinary measures, which may include termination, for violations of its Privacy Policy.

California-Specific Privacy Policy

The California Consumer Privacy Act

California enacted the California Consumer Privacy Act (“*CCPA*”) in 2018, and it is effective as of January 1, 2020. The CCPA imposes certain obligations on the Fund, the General Partner and the Investment Manager (together, “*we*” or “*us*”) and grants certain rights to California residents (“*California Resident*,” “*you*” or “*your*”) with regard to “personal information.” If you are a California Resident, please review the following information about your potential rights with regard to your personal information under the CCPA. The rights described herein are subject to exemptions and other limitations under applicable law.

Terms used herein have the meaning ascribed to them in the CCPA. The Fund, the General Partner and the Investment Manager are a “business.” “*Personal information*” under the CCPA means information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a California resident or a household. It does not include deidentified information, aggregate consumer information or publicly available information, as those terms are defined in the CCPA.

Purposes for Collecting and Using Personal Information:

We may collect or use your personal information for the following business or commercial purposes: (i) performing services on behalf of a fund, including maintaining or servicing accounts, providing investor relations services, processing subscriptions, and withdrawals; verifying information, processing payments or providing similar services; (ii) performing our contractual obligations to a California Resident as a subscriber to a fund, including providing updates on a fund’s performance, providing tax reporting and other operational matters; (iii) detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity, including preventing fraud and conducting “Know Your Client,” anti-money laundering, terrorist financing, and conflict checks; and (iv) enabling or effecting commercial transactions, including, using bank account details to remit funds and process distributions.

Personal Information We Collect:

In the preceding 12 months, we may have collected the following categories of personal information from or about a California Resident: (i) identifiers and similar information such as, name, address, date of birth, email address, social security number, driver’s license number, passport number, online identifiers or other similar identifiers; (ii) additional information subject to Cal. Civ. Code § 1798.80(e), including your, education, credit card number, state identification card number, signature, or bank account or other financial information; (iii) characteristics of protected classifications under federal or certain state laws, including, gender, national origin, or marital status; (iv) commercial information, including records of products or services purchased, obtained, or considered, or other purchasing histories or tendencies, including funds invested, investments considered, or sources of wealth; (v) internet or other electronic network activity information, including interactions with our website or use of certain online tools; (vi) professional or

employment-related information, including occupation, compensation, employer, and title; and (vii) inferences drawn from any of the information identified above to create a profile reflecting your preferences or similar information, including your potential interest in investing in new funds.

In the preceding 12 months, we may have disclosed for a business purpose all of the above categories of personal information to all of the categories of third parties discussed below in “Sharing Personal Information with Third Parties.”

Sources of Personal Information:

We may collect personal information about you directly from you and/or your intermediaries through sources such as: (i) account applications, subscription agreements, and other forms or related documentation; (ii) written, electronic, or verbal correspondence with us or our service providers; (iii) investor transactions; (iv) an investor’s brokerage or financial advisory firm, financial advisor, or consultant; and/or (v) from information captured on applicable websites. In addition, we may collect personal information from different sources, such as: (i) our affiliates, our service providers, or our affiliates’ service providers; (ii) public websites or other publicly accessible directories and sources, including bankruptcy registers, tax authorities, governmental agencies and departments, and regulatory authorities; and/or (iii) from credit reporting agencies, sanctions screening databases, or from sources designed to detect and prevent fraud.

Sharing Personal Information with Third Parties:

We do not sell your personal information. We may disclose personal information to third parties in circumstances where we believe in good faith that disclosure is required or permitted under law, to cooperate with regulators or law enforcement authorities, or to protect our rights or property. We also may disclose personal information about you or your accounts to a third party at your request or direction or with your consent.

For these reasons, we may disclose any of the categories of personal information discussed above in “Personal Information We Collect” to any of the following categories of third parties: (i) investors and investors’ intermediaries in connection with investments and transactions; (ii) third parties who deliver our communications, including postal services; (iii) third parties who assist with our information technology and security programs; (iv) third parties who assist with fraud prevention, detection and mitigation; (v) third parties as needed to complete a transaction, including financial institutions; (vi) third parties in connection with legal or regulatory matters, including government or regulatory agencies, courts, opposing counsel and parties to litigation; (vii) third parties in connection with the sale or transfer of all or any relevant portion of our business or assets; (viii) our lawyers, accountants, auditors, and consultants; and (ix) other third parties as permitted or required by law.

We also may disclose your personal information to our service providers, other entities that have agreed to limitations on the use of your personal information, or entities that fit within other exemptions or exceptions in or as otherwise permitted by the CCPA.

California Residents’ Rights under the CCPA:

If your personal information is subject to the CCPA, you may have certain rights concerning that information, subject to applicable exemptions and limitations, including the right to: (i) be informed, at or before the point of collection, of the categories of personal information to be collected and the purposes for which the categories of personal information shall be used; (ii) not be discriminated against because you exercise any of your rights under the CCPA; (iii) request that we delete any personal information about you

that we collected, subject to certain exceptions (“*Request to Delete*”); (iv) opt-out of the “sale” (as that term is defined in the CCPA) of your personal information if a business sells your personal information (we do not); and (v) request that we, as a business that collects personal information about you and that discloses your personal information for a business purpose, disclose to you (“*Request to Know*”): (a) the categories of personal information we have collected about you; (b) the categories of sources from which we have collected the personal information; (c) the business or commercial purpose for collecting the personal information; (d) the categories of third parties to which we disclosed personal information about you for a business purpose; (e) the specific pieces of personal information we have collected about you; and (f) the categories of personal information we have disclosed about you for a business purpose.

The CCPA does not restrict our ability to do certain things like comply with other laws or comply with regulatory investigations. In addition, the CCPA does not apply to certain information like personal information collected, processed, sold or disclosed pursuant to the federal Gramm-Leach-Bliley Act and its implementing regulations. We also reserve the right to retain, and not to delete, certain personal information after receipt of a Request to Delete from you where permitted by the CCPA or another law or regulation.

How to Submit a Request under the CCPA:

You may submit a Request to Know or Request to Delete, as described above, by calling us at (214) 390-3441, or by contacting IR@reverecapital.com.

We are required to provide certain information or to delete personal information only in response to verifiable requests made by you or your authorized agent. Any information gathered as part of the verification process will be used for verification purposes only.

In order to verify Requests to Know and Requests to Delete, we will contact you via your telephone number to verify your identity by asking you questions specific to the account in question.

If an authorized agent seeks to submit a request on behalf of a California Resident, the authorized agent may do so by the aforementioned methods, however, they must provide: (i) signed authorization from the California Resident authorizing them to act on the California Resident’s behalf, unless they can provide proof that the California Resident has granted them power of attorney pursuant to California Probate Code sections 4000 to 4465; and (ii) proof of their registration with the California Secretary of State to conduct business in California. We also require that the California Resident directly verify their own identity with us and directly confirm with us that they provided the authorized agent permission to submit the request.

Contact for More Information:

If you have any questions or concerns about this California-specific Privacy Policy, please contact Investor Relations at (214) 390-3441 or IR@reverecapital.com.