



**EAST LODGE CAPITAL PARTNERS LLP**  
**(the “Adviser”)**

**US CUSTOMER PRIVACY NOTICE – MARCH 2023**

This notice (the “**Privacy Notice**”) is provided to help you better understand the privacy policies of the US-regulated entities of the Adviser including those listed below. Please read this Privacy Notice carefully to understand what the Adviser and its Affiliated Entities<sup>1</sup> do with personal data provided to them.

Financial companies choose how they share your personal information. Federal law gives our clients 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. We do not disclose non-public personal information about our clients or former clients to third parties other than as described below.

**Who is Covered by this US Customer Privacy Notice?**

This Privacy Notice applies to clients of the Adviser who are natural persons and to prospective investors and current and former investors in Funds or Separately Managed Accounts (together, “Products”) who are natural persons.<sup>2</sup>

Natural persons who are resident in the UK or the European Economic Area (EEA) or have a relationship with the Adviser’s UK entities, may also be afforded protection under the EU General Data Protection Act (EU) 2016/679 or its UK equivalent (together, the “GDPR”). More information in relation to our arrangements for holding and protecting personal data under the GDPR is available in the data privacy policy terms on the Adviser’s website which can be located at [Data Privacy Policy - East Lodge Capital](#)

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<sup>1</sup> see “Who is providing this Privacy Notice?” for a list of Affiliates

<sup>2</sup> Note: Reg S-P requires investment advisers to provide their customers with certain notices describing their privacy policies and procedures (“Privacy Notice”). Among other requirements, Reg S-P requires financial institutions to send initial Privacy Notices to “consumers” and provide both customers and consumers the opportunity to opt out of the disclosure of any Nonpublic Personal Information about a consumer to a nonaffiliated third-party. The Fixing America’s Surface Transportation Act (the “FAST Act”) clarifies investment advisers’ obligations with regard to Reg S-P. Under the FAST Act, investment advisers are not required to send annual Privacy Notices to “customers” if the adviser (i) only shares Nonpublic Personal Information with nonaffiliated third-parties in a manner that does not require an opt-out right be provided to customers; and (ii) has not changed its policies and procedures with regard to disclosing Nonpublic Personal Information since it last provided a Privacy Notice to customers. For purposes of East Lodge’s privacy policies and procedures, “consumers” are potential and current Clients and Investors and “customers” are current Clients and Investors. Reg S-P does not require the distribution of Privacy Notices to companies, to investors in a private fund, or to individuals acting in a business capacity. In the event East Lodge were to provide investment advisory services to a Client that is a natural person, East Lodge will provide such person with an initial privacy notice and, when necessary, revised Privacy Notices.

## **What does the Adviser do with your personal information?**

### ***Personal information we collect.***

We may collect personal information about you in connection with our providing advisory services to you. This information is likely to include your social security number national insurance number, or other tax or government identification number, address, risk tolerance, and may include other information such as your income and/or assets, source of wealth, investment experience; transaction history; and banking details and wire transfer instructions.

### ***How we collect this information.***

We collect this information from you through various means. For example when you give us your contact information, enter into an investment advisory contract with us, enter into a subscription agreement or provide an application form to buy securities (i.e., interests in a fund) from us, tell us where to send money, or make a wire transfer. We also may collect your personal information from other sources, such as our affiliates or other non-affiliated companies.

### ***How we use this information.***

All financial companies need to share customers' personal information to run their everyday business and we use the personal information we collect from you for our everyday business purposes. These purposes may include for example information to best perform our obligations to provide advisory services to you, to open an advisory or management account for you, to process a transaction for your account, to market products and services to you, or to respond to court orders and legal investigations. Annex A sets out a detailed breakdown of key situations we consider may involve the Adviser or its affiliates, or their service providers using or processing the Personal Data provided.

### ***Disclosure to others.***

Except as described below, we do not disclose to affiliates or to non-affiliates any non-public personal information about you.

- We may provide your personal information to our affiliates and to firms that assist us in servicing your account and have a need for such information, such as a broker or fund administrator.
- We may also disclose such information to service providers and financial institutions with whom we have joint marketing arrangements (i.e., a formal agreement between non-affiliated financial companies that together market financial products or services to you, such as placement agents). In such a case, we require third-party service providers and financial institutions with which we have joint marketing arrangements to protect the confidentiality of your information and to use the information only for the purposes for which we disclose the information to them.
- We do disclose information to non-affiliated third parties for everyday business purposes, such as processing your investments or deposits and withdrawals and responding to court orders and legal investigations, as permitted or required by law. We also provide such information to our attorneys, banks, auditors, securities brokers and service providers as may be necessary to facilitate the acceptance and management of your investment and to enable them to perform services on our behalf.
- We may disclose information about our investors, prospective investors or former investors to affiliates (i.e., financial and non-financial companies related by common ownership or

control) or non-affiliates (i.e., financial or non-financial companies not related by common ownership or control) for our everyday business purposes, such as to process your transactions, maintain your account(s) or respond to court orders and legal investigations. Thus, it may be necessary, under anti-money laundering and similar laws, to disclose information about a product's investors in order to accept subscriptions or deposits from them. We will also release information about you if you direct us or consent for us to do so.

For further details of the purposes for which we may use or process your personal information and the third parties to whom we may disclose your personal information, please see Annex B and our Privacy Policy, a copy of which is available on request.

Your personal information may be transferred to and processed in any country in the world for any of the purposes described in our Privacy Policy. The countries to which your personal information is transferred may not offer an equivalent level of protection for personal information to the laws of your home country.

***When can you limit sharing of your Personal Information?***

As discussed above, we may share your personal information for a variety of reasons. You may limit our ability to share your information as set forth below:

<b>REASONS WE CAN SHARE YOUR PERSONAL INFORMATION</b>	<b>DO THE ADVISER AND AFFILIATE ENTITIES SHARE?</b>	<b>CAN YOU LIMIT THIS SHARING?</b>
<b>For our everyday business purposes</b> - such as to process your transactions, maintain your accounts(s) or respond to court orders and legal investigations.	Yes	No
<b>For our marketing purposes</b> - to offer our products and services to you	Yes	No
<b>For joint marketing with other financial companies</b>	Yes	No
<b>For our affiliates' everyday business purposes</b> - information about your transactions and experiences	Yes	No
<b>For our affiliates' everyday business purposes</b> - information about your creditworthiness	Yes	Yes
<b>For our affiliates to market to you</b>	Yes	Yes
<b>For non-affiliates to market to you</b>	Yes	We do not share

These sharing practices are consistent with Federal privacy and related laws, and in general, you may not limit our use of your personal information for these purposes under such laws. We note that the Federal privacy laws only give you the right to limit the certain types of information sharing as set out above (e.g., sharing with our affiliates certain information relating to your transaction history or creditworthiness for their use in marketing to you, or sharing any personal information with nonaffiliates for them to market to you).

### ***How can you limit sharing of your Personal Information***

- Call the Adviser's Chief Compliance Officer on +44 203 540 8400
- Email: [Compliance@Eastlodgecapital.com](mailto:Compliance@Eastlodgecapital.com)

Please note: If you are a new customer, we can begin sharing your information 30 days from the date we provided this Privacy Notice with the Product's Subscription Document/Application Form. When you are no longer our customer, we continue to share your information as described in this Privacy Notice. However, you can contact us at any time to limit our sharing.

### ***How is your personal information protected?***

To protect your personal information from unauthorized access and use, the Adviser uses security measures that comply with Federal law. These measures include computer safeguards and secured files and buildings. The Adviser also maintains physical, electronic and procedural safeguards to store and secure information about you from unauthorized access, alteration and destruction, and its control policies, for example, authorize access to investor information only by individuals who need such access to do their work.

### ***What if I have questions?***

If you have any questions about this Privacy Notice, or to request a copy of our Privacy Policy call the Adviser's Chief Compliance Officer on +44 203 540 8400 or email [compliance@eastlodgecapital.com](mailto:compliance@eastlodgecapital.com).

### ***Who is providing this Privacy Notice?***

This Privacy Notice relates to the Adviser and following entities (each an "Affiliated Entity"):

- East Lodge Capital Credit Opportunities Master Fund, Ltd.
- East Lodge Capital Credit Opportunities Fund, Ltd.
- East Lodge Capital Credit Opportunities Fund L.P.
- East Lodge Capital GP Ltd.
- East Lodge European ABS (Master) Fund Ltd
- East Lodge European ABS Fund Ltd
- East Lodge European ABS Fund L.P.
- East Lodge European ABS GP Ltd
- East Lodge Master Fund ICAV
- East Lodge Fund ICAV
- East Lodge Long Structured Opportunities Fund LP
- ELLSO GP Ltd

## ANNEX A

### **Investment / asset management services**

- To best enable us to effectively carry out our function as investment / asset manager; and to provide ancillary services to you.

### **Anti-money laundering, anti-bribery, “know your client” and other due diligence processes**

- To fulfil our regulatory and legal obligations relating to the prevention of money laundering, anti-bribery, fraud prevention, counter-terrorist financing, politically exposed persons checks, sanctions, regulatory and law enforcement checks and any other “know your client” checks.
- We may use third party services, such as the administrators of the funds managed or advised by the Adviser or third party screening service providers to help with these Processes.
- This includes confirming and verifying your identity, and screening against lists maintained by a third party which assists with this process (such as sanctions lists from governments around the world, as well as other information about individuals on this list which may include information about criminal convictions or political opinions, which has been obtained from publicly available sources, such as newspapers and company registrars).

### **New business onboarding**

- To onboard new business relationships and comply with our internal policies and procedures.

### **Suitability and appropriateness**

- To satisfy other regulatory suitability and appropriateness requirements.
- To determine your eligibility for investment in the funds managed by the Adviser;
- To determine your suitability to be granted access to the firm’s website or other provision of information by the firm;

### **Provision of products and services to you:**

- To provide products and services you have requested;
- to provide you with any information relating to such products or services; and
- to respond to any comments you may send us.

### **Relationship management**

- To enable us to efficiently manage our relationship with you or your business;
- to keep our records up to date;
- to maintain records of services provided and our interactions with you; and

**Manage service provider and distributor or intermediary relationships**

**Product development**

**Research**

**Business and financial management**

**Risk management**

**Legal, regulatory and compliance**

**Investigations**

**Fraud prevention**

**Legal proceedings**

**Operation of this website and IT operations**

- to monitor and respond to any complaints or concerns we may receive from you and to seek to resolve these.
- To enable us to manage how we work with other companies that provide services to us, the funds we manage and the investors in our funds.
- To assist in the development of new products and services.
- To conduct market, client or investment research; and
- to engage with you for the purpose of obtaining your views on our services, products and events.
- To run our business in an efficient and proper manner, including managing our financial position, business capability, planning, communications, corporate governance (such as company registers and other company secretarial functions), audit, insurance, sales, event organisation and vendor management;
- to enable third parties to provide us (or our clients or prospective clients) with services;
- to respond to client due diligence requests;
- to investigate and respond to client complaints; and
- to manage the performance and security of our equipment, IT systems and electronic platforms, including administering access rights.
- To effectively operate our audit, compliance controls and other risk management functions.
- To operate effectively our legal, regulatory and compliance processes, including but not limited to those that relate to the maintenance of regulatory registrations and conflicts of interest management.
- To detect, investigate and prevent breaches of legal obligations or internal and regulatory policies; and
- to detect, investigate and prevent the commission of criminal offences, in each case in accordance with applicable law and regulation.
- To detect, prevent and investigate fraud or potential fraudulent activity.
- To establish, exercise or defend our legal rights.
- To operate and support the Adviser's website;
- to process any registration using the Adviser's website;
- to communicate and interact with you via the Adviser's website;

**Security**

- to manage our IT systems and operations; and
- to operate our IT security and audits.
- To provide for physical security of our premises, staff, tenants of or visitors to those premises (including records of visits to our premises and CCTV recordings) and electronic security (including login records and access details, where you access our electronic systems).

**Health and safety**

- To perform health and safety assessments and recordkeeping; and to comply with related legal obligations

**Marketing and event planning**

- To provide you with information concerning features, services, products, fund launches, corporate events and related information.