

Castlelake, L.P. Privacy Policy

Effective Date: This Privacy and Cookie Policy was last updated August 1, 2025.

Scope of This Policy

This Privacy Policy describes how your personal information is collected, used, and disclosed by Castlelake, L.P., (“Castlelake”, “we”, “us”, or “our”) when you visit our website: <https://www.castlelake.com/index.html> (the “Site”) and wherever this policy is posted or linked, when you apply for a job at Castlelake, and in some circumstances in relation to services controlled by Castlelake (the “Services”) to the extent this is not dealt with under another specific privacy policy. This Policy applies to all personal information including on-line, off-line, and manually processed data. This website contains links to other sites that are owned by third parties. When you leave our site, you agree to the policies and conditions of use of the new site. You understand that our policies and conditions of use do not apply to the new site.

If you are a California resident, please review the [“Notice at Collection”](#) below to understand how we process California residents' personal information and how to exercise your rights under California law.

“Personal information” or “personal data” (hereafter, “personal information”) is information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. Personal information that is publicly available, a matter of public concern (such as newsworthy information), aggregated (e.g., compiled to create statistics that cannot identify a particular individual) or de-identified (stripped of all unique identifiers such that it cannot be linked to a particular individual) is not considered “personal information” for the purposes of this Privacy Policy.

Notice at Collection

We may collect or process various categories of personal information. The section titled “The Information We Collect” contains information on the categories of personal information collected. As an overview, we collect identifiers, personal information categories contained in customer records, characteristics of protected classifications, commercial information, professional or employment-related information, education information, internet, technical, or other similar electronic network activity information, audio, electronic, visual, thermal, olfactory, or similar information, and sensitive personal information. We collect this information to provide, maintain, and improve our Services, and for other reasons listed in the “How We Use Your Information” section below. Your personal information may be disclosed to service providers, affiliates, or third parties as outlined in “Disclosure of Your Personal Information.” We will retain your information for as long as needed to fulfill the purposes for which it was collected and to comply with our legal obligations, resolve disputes, and enforce our agreements. While we do not sell your personal information for monetary compensation, we partner with third-party advertising and analytics partners, which may be considered a “sale” of

personal information, or “sharing” of personal information for targeted advertising purposes, under applicable laws. We “sell” or “share” your identifiers, sensitive personal information, internet or other similar network activity, and any other personal information you submit via the website or webform. We only collect sensitive personal information, such as account or login information along with a password that provides access to the account, state or government ID or passport information, and/or health information, to provide our Site, Services, or to evaluate your job application and we delete this information in accordance with our data retention practices. If you would like to exercise your rights under applicable law, please visit the “Your Rights” section of this Policy.

The Information We Collect and How We Use It

We may collect information from you directly, from the devices you use to interact with us, from business partners that provide us with your personal information, and from third parties. We may also combine information from the Site and Services together with other information we obtain from our business records.

Information Relating to Our Services and Premises

We may collect information from you via email, our website forms, by telephone, when you visit our premises and otherwise, including:

CATEGORY OF INFORMATION	HOW WE COLLECT IT	PURPOSE	LAWFUL BASIS
Contact information , such as your name, employer name, address, email address, and phone number, including what you provide via our online forms.	Directly from you.	<p>Communication with you, including for business development.</p> <p>Compliance with Know Your Client obligations under financial services regulations.</p>	<p>Legal obligation.</p> <p>Legitimate interest in performance of a contract with our client (representatives of legal entities).</p> <p>In limited circumstances, performance of a contract with you (individuals).</p>
Information provided in connection with our Services , including account	Directly from you.	<p>Providing our Services to you.</p> <p>Compliance with financial services</p>	<p>Legal obligation.</p> <p>Legitimate interest in performance of a contract with our</p>

information.		regulations.	client (representatives of legal entities). In limited circumstances, performance of a contract with you (individuals).
Sensitive personal information , such as account information and login credentials for your account.	Directly from you.	Providing our Services to you. Compliance with financial services regulations.	Legal obligation. Legitimate interest in performance of a contract with our client (representatives of legal entities). In limited circumstances, performance of a contract with you (individuals).
CCTV footage.	Automatically when visiting our premises.	Ensuring security of our office premises.	Legitimate interest – necessary to ensure security of office premises.
Other information submitted to us , including via email communications.	Directly from you.	Providing our Services to you. Compliance with financial services regulations.	Legal obligation. Legitimate interest in performance of a contract with our client (representatives of legal entities). In limited circumstances, performance of a contract with you (individuals).
Information about your	Directly from you or from your	Providing our Services to you.	Legal obligation.

sources of funds where we are onboarding you as a counterparty.	company's KYC team	Compliance with financial services regulations.	Legitimate interest in performance of a contract with our client (representatives of legal entities). In limited circumstances, performance of a contract with you (individuals).
Referral information , where existing clients invite others to use our Services.	The person who made the referral.	Providing our Services to you. Compliance with financial services regulations.	Legal obligation. Legitimate interest in performance of a contract with our client (representatives of legal entities). In limited circumstances, performance of a contract with you (individuals).

Job Applicant Information

When you apply for a job with us, we may collect information from you via our website forms and otherwise, including:

CATEGORY OF INFORMATION	HOW WE COLLECT IT	PURPOSE	LAWFUL BASIS
Application information , including any information provided in connection with your application.	Directly from you or your recruitment agent.	Recruitment – including identifying candidates for roles, correspondence and interviews.	Necessary to take steps prior to entering into a contract with you.
Health	Directly from you	Compliance with	Legal obligation.

information , such as COVID-19 status and/or disability information.	or your recruitment agent.	employment and equality law.	
Information you authorize us to collect via third parties , for example references from former employers.	Your referees, including former employers and academic referees.	Recruitment – collection of references.	Legitimate interest in recruitment of appropriate employees.
Background checks prior to entering into an employment contract, including criminal records checks, right to work.	Directly from you, via publicly available information, or via third-party background check providers.	Compliance with financial sector regulations requiring background checks for recruitment of certain roles.	Legal obligation. Substantial public interest – regulatory requirements and protecting the public against dishonesty.

In certain circumstances, you may submit your application for employment through a third-party service that displays our job posting. We do not control the privacy practices of these third-party services. Please review their privacy policies carefully prior to submitting your application materials.

Information Collected Automatically By Using Our Website

When you visit our website, Castlelake, and third party partners working on our behalf, will automatically collect and process certain personal information about you. We, and our third party partners, may use log files, pixels, cookies, or other digital tracking technologies to collect the following information from the device or application you use to interact with our Site and Services:

CATEGORY OF INFORMATION	HOW WE COLLECT IT	PURPOSE	LAWFUL BASIS
Device information , such as IP address and device identifiers.	Automatically through your use of our Site.	Website analytics.	Legitimate interest in generating useful statistics that give a fair view of the use of our website.

Diagnostics information, including web traffic logs.	Automatically through your use of our Site.	Website analytics.	Legitimate interest in generating useful statistics that give a fair view of the use of our website.
Analytics information about your browser and how you interact with content on our Site.	Automatically through your use of our Site.	Website analytics.	Consent.
Advertising information, including unique identifiers that enable us or third parties working on our behalf to target advertisements to you.	Automatically through your use of our Site.	Website analytics.	Consent.
Video viewing history when you interact with any video content on our Site.	Automatically through your use of our Site.	Website analytics.	Consent.

Please be aware that our advertising partners may collect information about you when you visit third-party websites or use third-party apps. They may use that information to better target advertisements to you on our behalf.

How We Use Your Information

We process personal information only in ways compatible with the purpose for which it was collected or subsequently authorized by you. To the extent necessary for such purposes, Castlelake will take reasonable steps to make sure that personal information is accurate, complete, current, and otherwise reliable with regard to its intended use. All your personal information will be treated in confidence and will only be used in compliance with the purposes stated in this privacy policy. In addition to the information provided above, we may use any of the information we collect for the following purposes:

- Service functionality, such as to provide you with our Site and Services, including to take steps to enter a contract for services, process payments, send service communications, and conduct general business operations, such as accounting, recordkeeping, and audits.
- To understand how our Site and Services are being used, our customer base and purchasing trends, and the effectiveness of our marketing.
- To offer you personalized recommendations and tailor the Site and Services to your preferences.
- To send you advertising and marketing communications, personalize the advertisements you see on our Site and Services and third-party online properties, and measure the effectiveness of our advertising.
- For security purposes, such as to protect and secure our Site and Services, assets, network, premises, and business operations, and to detect, investigate, and prevent activities that may violate our policies or be fraudulent or illegal.
- For legal compliance, such as to comply with legal process, such as warrants, subpoenas, court orders, and lawful regulatory or law enforcement requests and to comply with applicable legal requirements.

Disclosure of Your Personal Information

Generally, we will only disclose personal information with our contracted service providers and advisors. Any disclosure of personal information will take place in compliance with applicable data protection legislation.

While we will never sell personal information about you to a third party for monetary compensation, we partner with third party advertising and analytics partners, which may be considered a “sale” or “sharing” of personal information under applicable laws. For example, your IP address will be collected via Google Analytics, which will process it to generate statistics on the use of our website.

We may also disclose your personal information to the following parties:

- To affiliates, strategic partners, or third-party marketers or other unaffiliated parties who are offering products or services that we believe may be of interest to you or who require your personal information for research, administrative and/or internal business purposes.
- To service providers, agents, or independent contractors who help us maintain our Site, Services, operations and premises, and provide other administrative services to us.
- To third party online advertising partners that assist us in advertising our Services, including partners that use cookies and online tracking technologies to collect information to personalize, retarget, and measure the effectiveness of advertising.
- To government entities or law enforcement. We may share information when we believe in good faith that we are lawfully authorized or required to do so to respond to lawful subpoenas, warrants, court orders, or other regulatory or law

enforcement requests, or where necessary to protect our property, rights, or the safety of our employees, our customers, or other individuals.

- To other businesses in the context of a commercial transaction. We may change our ownership or corporate organization while providing the Site or Services. We may transfer to another entity, its affiliates, or its service providers some or all information about you in connection with, or during negotiations of, any merger, acquisition, sale of assets or any line of business, a change in ownership control, or a financing transaction. We cannot promise that an acquiring party or the merged entity will have the same privacy practices or treat your information as described in this policy.

Information Security

We take reasonable physical, technical, and organizational measures to safeguard and secure any personal information you provide to us. Please understand, however, that no data transmissions over the Internet can be guaranteed to be 100% secure due to the inherent risks of data transmission over the Internet. Consequently, we cannot ensure or warrant the security of any information you transmit to us, and you understand that any information that you transfer to us is done at your own risk. If we learn of a security system breach, we may attempt to notify you electronically so that you can take appropriate protective steps.

If you register with our Site, you are responsible for maintaining the security of your password at all times. You may gain access to and review your personal information by accessing your account. You are responsible for activity occurring while logged into your account.

By using the Site or Services and providing personal information to us, you agree that we can communicate with you electronically regarding security, privacy and administrative issues relating to your use of the Site. We may post a notice via our Site if a security breach occurs. We may also send an email to you at the email address you have provided to us in these circumstances. Depending on where you live, you may have a legal right to receive notice of a security breach in writing.

Information Retention

We will retain your information for as long as needed to fulfill the purposes for which it is collected and to comply with our legal obligations, resolve disputes, and enforce our agreements. Generally, we may keep your contact information and your request as a part of our customer file or potential customer file. Castl lake will not retain information about you for longer than necessary in relation to the purposes for which they are processed.

The data stored in cookies are deleted as specified in the chart in the Cookie Policy section below.

“Do Not Track” Signals

The “Do Not Track” (“DNT”) privacy preference is an option that may be made in some web browsers allowing you to opt-out of tracking by websites and online services. At this time, global standard DNT technology is not yet finalized and not all browsers support DNT. We therefore do not recognize and/or respond to all DNT signals.

Public Posting Areas and Social Media

Please note that any information you include in a message you post to any public posting area, such as the comment section of our social media pages, is available to anyone with Internet access. If you don't want people to know your email address, for example, don't include it in any message you post publicly. PLEASE BE EXTREMELY CAREFUL WHEN DISCLOSING ANY INFORMATION IN PUBLIC POSTING AREAS. WE ARE NOT RESPONSIBLE FOR THE USE BY OTHERS OF THE INFORMATION THAT YOU DISCLOSE IN PUBLIC POSTING AREAS.

Children’s Information

The Site and Services are intended for users aged 16 and older. We do not knowingly collect personal information from children under age 16 through this Site or the Services. If we discover that we have inadvertently done so, we will delete that information.

International Data Transfers

If you choose to provide us with personal information, we may transfer that personal information to our affiliates, service providers, or to other third parties, in accordance with local law. We may also transfer your personal information across borders, from your country or jurisdiction to other countries or jurisdictions in accordance with legal requirements. By using the Site or Services and/or providing us with this information, you acknowledge this transfer in accordance with the terms of this Policy, which may not offer the same level of data protection as the country where you reside, and you do not require separate notification of each such transfer that occurs. We primarily use European Union Commission Standard Contractual Clauses for data transfers from the European Economic Area, the United Kingdom, and Switzerland to countries outside these regions. For transfers between other jurisdictions, we may rely on other legal mechanisms for international transfer, as appropriate under applicable law. Please contact us for more information and to receive a copy of the standard contractual clauses we may utilize.

Disclaimer Regarding Video Content

Castlelake’s Sites may contain cookies, Software Development Kits, or other tracking technologies which provide us and third parties with analytics regarding how website visitors interact with video content, audiovisual content, or content of a like nature (collectively, “Video Content”). Video Content is provided for the purpose of enhancing

the user experience on the Castlelake Sites and by continuing to use the Sites and interacting with Video Content, you understand that your personal information, including your video viewing history, may be processed according to the Castlelake Privacy Policy and Cookie Policy.

Governing Law

Your access and use of this website and the content hereof shall be governed and interpreted in accordance with the laws of the United States.

Other Required Disclosures

Your Nevada Privacy Rights

Residents of Nevada have the right to opt-out of the sale of certain personal information to third parties. We currently do not sell your personal information as defined by Nevada law.

California “Shine the Light” Law

If a company shares personal information of California residents with third parties for their direct marketing purposes (e.g., to send offers and information that may be of interest to you), California law requires either providing a mechanism by which consumers can obtain more information about such sharing over the prior calendar year, or providing a mechanism by which consumers can opt out of such sharing. We do not share your personal information with third parties for their direct marketing purposes, so we do not offer an opt-out at this time.

Your Rights

You may have certain rights with respect to your personal information depending on your location or residency. Castlelake responds to rights requests according to local law.

The following rights are available in the EU, UK, Switzerland, and California.

- **Right to access and portability:** You may have the right to confirm whether your personal information is being processed and to get access to it and other information.

Where possible and allowed by law, we will provide a copy of the personal data we are processing. For more copies, we may charge a reasonable fee. If you make the request by electronic means, and unless otherwise requested, the data shall be provided in electronic form.

- **Right to correction, rectification, and completion:** You may have the right to correct, rectify, or complete your personal data if inaccurate or incomplete.

- **Right to delete or erasure (“right to be forgotten”):** You may have the right to the deletion or erasure of your personal data.
- **Right to restriction of processing:** You may have the right to request that we restrict our processing of personal information.
- **Right to object to processing:** You may have the right to object to processing of your personal data which is based on our legitimate purposes.

In California, you have the following additional rights:

- **Right to opt-out of profiling:** If we base decisions solely on profiling or automated decision-making that may result in important legal or other effects, you may have the right to opt-out.
- **Right to opt-out of the sale of your personal information or its sharing for targeted advertising:** You may have the right to opt-out of the sale or sharing for targeted advertising purposes of your personal information to third parties. To exercise this right, you may submit a request by contacting us. Note that we do not sell or share the personal information of individuals under 16 years old. Please also note that in some jurisdictions, this is an opt-in right to which we comply by obtaining express consent at our points of collection.
- **Right to limit the use and disclosure of sensitive personal information:** You may have the right to limit the use and disclosure of your sensitive personal information if we use such information to infer characteristics about you.
- **Right to Nondiscrimination:** We will not discriminate against you for exercising any of these rights.

In other jurisdictions, including the EU, Switzerland or the UK, you may have different or additional rights, like the following:

- **Right to anonymity:** You may also have a right to request anonymity. If you choose to exercise this right, we may not be able to provide you with your requested goods or services.
- **Right to obtain information about data transfers:** You may also ask for information about and a copy of the safeguards we use to transfer personal information across borders.
- **Right to lodge a complaint with a supervisory authority:** Users who are located in the EEA, U.K., or Switzerland have the right to lodge a complaint about our privacy practices with a supervisory authority. Contact details for data protection authorities are available here: <http://ec.europa.eu/justice/data->

[protection/bodies/authorities/index_en.htm](https://www.castlelake.com/privacy/protection/bodies/authorities/index_en.htm).

You may under certain circumstances, authorize another individual or a business, called an authorized agent, to make requests on your behalf.

We must verify your identity before responding to your request. We do this by asking you to provide information that we can match against information we may have about you already. We may need to follow up with you to request more information to verify your identity. We will not use personal information we collect in connection with verifying or responding to your request for any purpose other than responding to your request.

Changes to Our Privacy Policy

Castlelake reserves its right to modify this Privacy Policy at any time at its sole discretion. We may also notify you in other ways from time to time about the processing of your personal information. The date the Privacy Policy was last revised is identified at the top of the page.

Contact Information

For questions regarding this Privacy Policy, or to exercise a data subject right under applicable law, you may contact us via any of the following methods:

Telephone: 866-380-3413

E-mail: communications@castlelake.com

Mail: 250 Nicollet Mall, Suite 900, Minneapolis, MN 55401

Cookie Policy

What is a cookie?

Cookies, pixels, and similar digital tracking technologies (together, “cookies”) are small text files that are stored on your computer, smartphone or other device when you visit a website. Cookies are used by most websites, and they make it possible for the website, and any third parties whose cookies are on that website, to recognize your computer/IP address and gather information about which pages are visited by your computer, in addition to the duration and timing of your visit. Some of this information is anonymous, and some can be used to identify your browser data. Cookies containing personal information will only be used for the specific purposes stated in the “How We Use Your Information” section above.

The amount of time that cookies are on your computer or mobile device depends on the functions they need to achieve, for instance, cookies may be effective only for the duration of your browsing session and are deleted when your session ends (session

cookies) or they may be more permanent and retained unless you choose to delete them (persistent cookies). Cookies may be placed by the operator of the website that you are visiting (first-party cookies) or by other operators setting cookies through that website or app (third-party cookies).

Cookies on Castlelake.com

Castlelake uses cookies on this website in order to generate statistics about how people use our site, and to improve the functionality and user experience of our website. For example:

- We use Google Ads' phone call tracking to anonymously track if an ad in Google Ads results in a phone call. Call length is recorded, but not the contents of the call.
- With Google Analytics and Google Ads a cookie is placed in the user's browser which may put them in a list which we remarket to (e.g., show banner ads to them as they browse other websites on the Internet).

The cookies that we use fall within the following categories: "Functionality Cookies", "Statistics Cookies" and "Marketing Cookies". The categories and specific cookies used on Castlelake.com are described below.

Functionality Cookies, also called "Necessary" or "Essential" cookies, are placed on your device to provide a consistent user experience. Cookies in this category are used to help remember your preferences (i.e., languages, destination etc.).

THE DOMAIN THAT SETS THE COOKIE	THE NAME OF THE COOKIE	FINAL DATA OWNER	PURPOSE	EXPIRY
Castlelake.com	JSESSIONID	Castlelake	Session cookie to store user settings related to browsing the website.	Session
Castlelake.com	core.allowed	Castlelake	Stores which categories of cookie the website is authorized to use.	Persistent

Castlelake.com	com.plaudit.core.i18n.l18nBean.Country	Castlelake	Stores the user's country	Persistent
Castlelake.com	com.plaudit.core.i18n.l18nBean.Language	Castlelake	Stores the user's language	Persistent

Statistics Cookies are used to collect data on how the website is being used. This data is used by Castlelake to help optimize the performance of our Site.

THE DOMAIN THAT SETS THE COOKIE	THE NAME OF THE COOKIE	FINAL DATA OWNER	PURPOSE	EXPIRY
Castlelake.com	_ga and core.gacid	Google	Used to distinguish users.	2 Years
Castlelake.com	_gat or _dc_gtm_<property-id>	Google	Used to throttle request rate.	1Minute
Castlelake.com	_gid	Google	Used to distinguish users.	24Hours

Marketing Cookies are used to track data for analytics and business purposes. This type of data is often collected and stored by a third party, such as Google Analytics. Data collected may be used to supply tailored ads when browsing the Site.

THE DOMAIN THAT SETS THE COOKIE	THE NAME OF THE COOKIE	FINAL DATA OWNER	PURPOSE	EXPIRY
Castlelake.com	IDE	Google	The main purpose is for targeting/advertising. This cookie is associated with the DoubleClick for Publishers service from	1 Year

			Google.	
Castlelake.com	_gac_<property- id>	Google	Contains Google Ads campaign related information for the user.	90 Days
Castlelake.com	Gwcc	Google	The main purpose is to track the number of call conversions on mobile devices (using the phone numbers on our “contact” page).	3 Months
Castlelake.com	user-id	StackAdapt	The main purpose is for targeting/advertising.	1 Year
Castlelake.com	user-id-v2	StackAdapt	The main purpose is for targeting/advertising.	1 Year
Castlelake.com	sa-aid-pv	StackAdapt	The main purpose is for targeting/advertising.	1 Hour
Castlelake.com	sa-camp-*	StackAdapt	For tracking the effectiveness of our advertising campaigns.	Up to 90 days
Castlelake.com	LinkedIn Insight Tag	LinkedIn	The main purpose is for targeting/advertising	Up to 180 days

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How to Remove Cookies

You can reject cookies on your device by selecting the appropriate settings on your device or browser. However, please be aware that without cookies you may not be able to use all of this website's features. Since cookies are saved by your browser, it is possible for you to view, change, or delete any cookies that you desire.

If you do not wish to receive cookies from [Castlelake.com](https://www.Castlelake.com), you can modify your browser's use of cookies using your browser's settings. In common web browsers you can disable cookies or create a per-domain policy (e.g., allow cookies from some websites but block for others). You can also delete individual cookies, or all the cookies that your browser has stored. More information can be found in these guides:

- [How to delete cookies in Google Chrome](#)
- [How to delete cookies in Mozilla Firefox](#)
- [How to delete cookies in Microsoft Edge](#)
- [How to delete cookies in Microsoft Internet Explorer](#)

If you are no longer interested in receiving interest-based ads from our U.S. Site, you can opt-out by contacting us. Please note, however, that opting out does not mean you will no longer see ads from us online. It simply means that the online ads from us you do see will not be based on your particular interests.

Depending on where you live, you may be able to access one convenient place to indicate your preferences, including the option to make one "universal" opt-out of interest-based advertising with participating entities:

In the United States, visit this site: [Ad Choices](#).

In the EU, visit this site: [Your Online Choices](#).

When you opt-out using these methods, a cookie will be placed on your device indicating that you have opted-out of interest-based advertising. If you delete your cookies, you will need to opt-out again. These websites also provide detailed information about interest-based advertising and tips for managing your online privacy.

Please note that personal information processing by third party cookie providers is subject to those third parties' own privacy policies, and not this Cookie Policy. Again, we do not endorse and are not responsible in any way for the privacy practices of third

party websites.

Contact Information

For questions regarding this Cookie Policy, or to exercise a data subject right under applicable law, you may contact us via any of the following methods:

Telephone: 866-380-3413

E-mail: communications@castlelake.com

Mail: 250 Nicollet Mall, Suite 900, Minneapolis, MN 55401

Singapore

Pursuant to the Personal Data Protection Act, Castlelake Pte. Ltd ("**Castlelake Singapore**") has designated a Data Protection Officer ("**DPO**"). Please email DPO.Singapore@castlelake.com to contact Castlelake Singapore's DPO.