

Viola Credit Website - Privacy Policy

Viola Credit Partners Management, Limited Partnership, and any of its affiliates, (referenced below as “**Viola Credit**”, “**We**”, “**Us**”, as applicable), respects your privacy and is committed to protect the Personal Information that you share with Us on our website <https://violacredit.com/>, (“**Website**”). This policy describes the scope of Personal Information that may be collected on the Website and the usage of it.

By accessing or using the Website, you acknowledge that you have reviewed both the Website’s Terms and Conditions (“**T&C**”) and this Privacy Policy and agree to be bound by them and express your explicit consent to the provisions of this Privacy Policy, including for the purposes of data collection, processing, storage and other related activities as described in the Privacy Policy. Should you do not agree to these terms, you must immediately refrain from further access to and/or use of the Website.

This Privacy Policy may be occasionally updated. If We make any substantial changes in the manner We use your Personal Information, then We will provide a proper notice within this Privacy Policy.

1. SCOPE

This Privacy Policy applies to you and Us, in relation to the Website, and it governs any and all data collection and usage made by Us in compliance with applicable regulations. By using the Website, you are therefore consenting to the data collection procedures expressed in this Policy. We gather limited types of information from our Users, as explained in more detail below, and We use such information internally in connection with the Website and/or it’s services, including to personalize, provide, and improve our services, to contact you if necessary, and to analyze how you use the Website.

2. WHAT INFORMATION WE COLLECT

While using the Website, you may be required to provide and/or choose to share with Us certain information, including Personal Information and Anonymous Data (as defined hereafter). In this context, We may collect and retain the following types of information pertaining to our users:

Personal Information – means any information that may be used to identify an individual, either alone or in combination with other information. In the context of the Website, such information will be essential authentication cookies, and any contact information that may be provided by you when you interact with Us.

Other Information –We may also collect other analytics tools to collect information about the use of The Website and types of technical data in the context of the use of the Website, including information about your device, software, user specifications, settings and preferences.

Anonymous Data - means data that is not associated with or linked to your Personal Information; Anonymous Data does not, by itself, permit the identification of individual persons.

It is the intent of the Website to collect and use Personal Information solely for the purpose for which it was requested and or transmitted, and any additional uses specifically provided for in this Privacy Policy.

The information collected and/or provided by you through the Website will be stored in our databases in accordance with applicable law and for the purposes outlined in Section 3 of this Privacy Policy. You acknowledge that you are not required under applicable law to provide Us with any of your Personal Information, and that any such collection and/or provision is made voluntarily, based on your own free will and explicit consent.

3. **HOW DO WE USE THE INFORMATION**

Generally, We use the information gathered to provide, improve, and develop the Website, to communicate with you, to offer you better services, and to protect Us and our users. When you interact with or make use of the Website, We use a variety of technologies to process the information that We collect about you for various reasons.

The purposes of our collection and processing of information in the context of the Website are:

- To operate the Website and to facilitate and provide our services;
- To address their applications, inquiries, questions, requests, comments, responses etc.;
- To study users' interaction with our Website for the purpose of assessing its performance and/or effectiveness;
- To operate, evaluate, develop, manage, improve and enrich the information and various services offered through the Website, and create new services and content that meet the requirements and expectations of users as well as modify or cancel existing services;
- To prevent illegal and/or unauthorized use of the Website and to comply with and enforce applicable legal requirements, relevant industry standards and policies, including this Privacy Policy and Our T&C;
- To increase and maintain the safety and security of our Website and/or other services;
- To fulfil contractual obligations with third parties;
- For any other purpose required or permitted by applicable laws or set out in this Privacy Policy.

4. **WHO DO WE SHARE THE INFORMATION WITH?**

Viola Credit is committed to protecting your privacy and will not share or disclose information about you, unless otherwise permitted under the following terms and/or circumstances:

- When We have your consent to share such information;
- When We need to share your information to provide you with the relevant information that you have requested as part of our contractual relationship;
- When We need to share certain information with our service providers, that may use your information to perform services on our behalf and may have access to, store and process your information, including your Personal Information, including as part of our contractual relationship (they are prohibited from using that information for any other purpose);
- For the purpose of analysis and statistics, provided that such disclosure is done anonymously and is non-personal identifiable;
- In the event that Viola Credit deems that the disclosure of the information is necessary in order to prevent serious damage to the bodies or property of the users or of any other party;
- If required to do so by applicable law, or in the good-faith belief, that (i) disclosing such information is necessary to comply with any applicable law or respond to any court order, search warrant or equivalent, or where in reasonable belief an action is needed in order to protect the personal safety of any individual; and (ii) such disclosure is appropriate or necessary in order to enforce the T&C, take precautions against liabilities, investigate and defend against any third party claims or allegations, assist government enforcement agencies, protect the security or integrity of the Website and servers and protect our rights and property.

5. **HOW DO WE USE COOKIES?**

We may also collect Personal and Non-Personal Information through automatic means, for instance by using industry-wide technologies such as cookies (a string of information that can be stored on Your

device, if Your device is set to permit storage of cookies), or other similar tracking technologies, which store certain local information on Your device to help Us learn more about how you use Our Website and enhance Your experience. We may use third-party service providers in order to process such information.

Cookies are alphanumeric identifiers that are transferred to and stored in Your electronic device through Your web browser for record-keeping purposes. Certain cookies allow making it easier for You to navigate, while others are used to enable a faster log-in process or to allow Us to track Your activities.

We use cookies to ensure you get the best experience on the Website. You can choose to enable or disable Cookies in Your internet browser or delete them. If you choose to enable or delete them, it may have an impact on Your experience on the Website for example You may not be able to use certain features on Our Website.

6. **DATA RETENTION & SECURITY**

We may retain all the information We collect or that you share with Us for as long as required for the provision of our information and/or services in relation to the Website and/or its services. In addition, We may also retain such information for as long as required to comply with our legal or business requirements or obligations, to resolve disputes, to enforce our T&C, all as permitted under any applicable laws.

Without derogating from the above, We may retain Personal Information if it is necessary to fulfil the purpose for which the information has been provided and/or collected. This means that We may delete Your Personal Information when such information is no longer necessary. Statistics and analysis which have been anonymised may be saved thereafter.

We will take commercially reasonable measures in providing secure transmission of Your information across the internet to our servers, and in securing the data which relates Your information while at rest, as applicable.

We may use Cloud Service Providers for our servers and/or storage. In such cases, We rely on the security measures taken by the Cloud Service Provider for the physical security, the integrity, redundancy and the data protection of the data which relates Your information.

However, You should be aware that there is always some risk involved in transmitting information over the internet and that there is also some risk that others could find a way to thwart our and/or the Cloud Service Provider security systems. As a result, while We strive to protect Your information, We cannot ensure or warrant the security and privacy of Your Personal Information or other content You may have provided while using the Website, and You do so at Your own risk. We encourage You to exercise discretion regarding the Personal Information You choose to disclose.

7. **DATA SUBJECT RIGHTS**

You may at any time request Us to provide You with access to your Personal Information, and to review and rectification of your Personal Information, insofar as such information is incorrect, incomplete or out of date, where applicable.

If you wish to act in accordance with the above, you can send us an e-mail with your request to: talt@violacredit.com, and We will make reasonable efforts to respond within a reasonable period of time, and pursuant to any applicable laws.

Note that unless You instruct Us otherwise, We may retain and use Your Personal Information for as long as reasonably required for the purposes of which such Personal Information was collected, including without limitation, for future analytics and analysis, comply with our legal or business requirements or obligations, to resolve disputes, to enforce our T&C, all as permitted under any applicable laws.



8. **PRIVACY INQUIRIES**

If You have any questions or queries about this Privacy Policy or regarding the way or manner We collect or process Your Personal Information, You may contact Us via e-mail at: talt@violscredit.com.

Last updated: 1/2025

