



Monroe Capital Personnel Privacy Notice

Last modified: March 29, 2024

1. Introduction

Monroe Capital Management Advisors, LLC and its affiliates (collectively, “**Monroe Capital**” or “**We**”) respect your privacy and are committed to protecting it through our compliance with this Monroe Capital Personnel Privacy Notice (our “**Personnel Privacy Notice**”).

This Personnel Privacy Notice describes the information we may collect from you, that we may receive from third parties, or that we may create about you before, during, and after your employment or our contracting relationship with you or your employer (if you are contracted through a third-party) (the “**Personnel Relationship**”) as well as our practices for collecting, using, maintaining, protecting, and disclosing that information. This notice does not form part of any contract of employment or other contract to provide services.

This Personnel Privacy Notice applies to information we collect:

- Directly from you, when you apply for employment or to be a contractor, when you accept employment or contractor relationship, and during the Personnel Relationship with us.
- That we create about you before, after, and during the course of your Personnel Relationship.
- That we collect from third parties who help us manage our business, such as your former employers, educational institutions, and background and criminal reporting organizations.
- That we collect automatically as part of your Personnel Relationship, such as information related to your access and use of our information and communications technology and the information contained on them and information when you access our facilities.

Please read this Personnel Privacy Notice carefully to understand our policies and practices regarding your information and how we will treat it. This Personnel Privacy Notice may change from time to time (see [Changes to Our Personnel Privacy Notice](#)).

2. Information We Collect About You and How We Collect It

Generally

For the purposes of this Personnel Privacy Notice, the term “**Personal Data**” means any information about an identifiable individual collected in connection with your Personnel Relationship or potential Personnel Relationship, excluding anonymous or deidentified information that is not associated with a particular individual. We collect, create, and process the following types of Personal Data (which are required for employees, and some of which may be required for potential employees and contractors or potential contractors) in connection with your Personnel Relationship or potential Personnel Relationship:

- by which you may be personally identified (including sensitive information) as further described below; and
- that is about you but does not by itself identify you as further described below. We consider this information Personal Data when it is linked with or otherwise associated with you.

We collect this information:

- Directly from you when you provide it to us.
- From third parties who help us manage our business.
- When you use our information technology systems or access our facilities.
- We also create this information during the course of your Personnel Relationship.

Information You Provide to Us

We collect information directly from you before, after, and during your Personnel Relationship with Monroe Capital. Depending on your role or relationship with Monroe Capital, we may collect Personal Data from you such as your name, address, social security number (or national ID number), a list of your beneficiaries, work history, educational history, personal and work preferences (and any other information you may voluntarily disclose on your application or resume), date of birth, marital status, picture, dependents (and their dates of births, social security number or other national ID numbers), immigration status, gender, ethnicity, veteran status, disabilities, personal email, banking information (in order to pay you your salary or other compensation and to reimburse you for expenses in accordance with Monroe Capital's expense reimbursement policies), number of tax exemptions (where applicable), emergency contact information, personal phone number, and image and other biographical information.

Depending on your role and relationship with Monroe Capital, we may also collect certain biometric information, such as your fingerprints, when required by applicable law. The laws in some jurisdiction may require that you provide affirmative consent to our collection and use of such biometric information. When this is required, we may ask you to provide a written consent for our collection and use of your biometric information.

Some of the Personal Data we collect from you is required to enter into an employment contract with Monroe Capital, and for Monroe Capital to perform under the contract. If you refuse to provide such Personal Data, then in some cases we may not be able to enter into the applicable contract for your Personnel Relationship or fulfill our obligations to you under it.

Information We Create About You

In addition to the Personal Data that you may provide to Monroe Capital, Monroe Capital also creates and associates certain Personal Data with you, such as: job title, employee number, badge number, salary, expense, and other related compensation details, employment status, information regarding mandatory training, vacation/holiday pay and other paid time off, disciplinary and grievance information, tax records, performance history, office access records and video surveillance records (where applicable) system access information such as your Monroe Capital username to access our technology systems, email address, telephone number, and password (which you may change). We may also collect and process information specifically related to your job function, such as sales and production volumes. We may also photograph you to include in the personnel directory and/or to issue you a badge to access and be identified at Monroe Capital's facilities.

Information We Collect Through Automatic Data Collection Technologies

As you use Monroe Capital's information technology systems, we may collect information about your use necessary to protect our information technology and infrastructure. We may collect time, date, and

location information of access to our information technology systems and the data contained on those systems. To the extent permitted by applicable law, we may also monitor, intercept, and review your activities when you use our information technology resources and communications systems, including but not limited to email (both outgoing and incoming), telephone conversations, and voice mail recordings, and instant messages. To the extent permitted by law, our facilities may also deploy video and other similar recording technologies which may be operated by a third party owner or operator of the buildings where our facilities are located.

Information We Collect from Third Parties

Monroe Capital also collects Personal Data about you from third parties. This may include Personal Data that is disclosed in background checks (if permitted in your jurisdiction and which may include criminal convictions), drug testing (if permitted in your jurisdiction and taken by you) and any information that is disclosed from your former employers, educational institutions, and other references you list on your application materials or that are referred to us.

3. Use of Your Information

Depending on your role or relationship with Monroe Capital, we may use the Personal Data we collect for one or more of the following purposes:

- recruiting, including identifying and evaluating job applicants, including assessing skills, qualifications, and interests for the purposes of determining suitability for the position for which you have applied;
- if you are an employee of Monroe Capital, delivering or administering your salary and benefits, including insurance benefits;
- if you are a contractor of Monroe Capital, providing you with your agreed upon compensation;
- managing our workforce and, if you are an employee of Monroe Capital, your career;
- delivering training programs, and measuring and recording the results of training;
- communicating with you and for you to communicate with Monroe Capital Personnel;
- collecting and maintaining information about your work history and work performance;
- investigating accidents and claims of wrongdoing, including to collect evidence for possible grievance or disciplinary actions or legal disputes;
- to run and manage business operations, including to schedule work, manage the business organization, business assets, travel and expense reimbursement, managing corporate credit cards and card payment history, maintaining corporate contact directories and organizational charts, managing and storing records;
- processing IT infrastructure, including email, internet, social media systems, and file shares;
- maintaining the security and safety of our facilities, personnel, and other assets, including to authenticate personnel to access Monroe Capital's IT resources and facilities, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;

- to conduct screening and background and compliance checks before and during your employment at Monroe Capital and maintaining records on such screening and checks;
- if you are an employee, providing employment programs such as on-site health services, company cars, pension schemes, stock options, and other similar benefits;
- to comply with legal requirements, including to withhold taxes, and to report accidents, salary, and tax information to regulatory authorities;
- to respond to law enforcement requests and as required by applicable law, court order, or governmental regulations;
- to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Monroe Capital's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Monroe Capital about our employees is among the assets transferred;
- in order to publish your name, picture, and contact information in our internal employee directory and, for leadership positions, to publish your online biography and for similar marketing efforts in accordance with Monroe Capital's policies; and
- as described to you when collecting your Personal Data or as otherwise set forth in applicable law.

Monroe Capital will not use the Personal Data we collected for materially different, unrelated, or incompatible purposes without providing you notice.

4. Disclosure of Your Information

We do not share, sell, or otherwise disclose your Personal Data for purposes other than those outlined in this Personnel Privacy Notice. However, we may disclose aggregated information about our employees, and information that does not identify any individual, without restriction.

We may disclose Personal Data that we collect or that you provide as described in this Personnel Privacy Notice:

- amongst our subsidiaries and affiliate companies;
- to contractors, service providers, and other third parties we use to support our business and who are bound by contractual or legal obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them. These entities provide services such as IT and infrastructure support (including our cloud service providers), payment processing, benefits administration, auditing, legal, advisory, and other similar services;
- to third party providers who perform background checks and other similar functions (where permitted by law);
- to a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Monroe Capital's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Monroe Capital about our employees is among the information and other items transferred; and

- to fulfill the purpose for which you provide it. For example, if you email someone outside of Monroe Capital, your email address and other information you provide in your email will be shared with the recipient.

We may also disclose your Personal Data:

- to government entities in order to comply with any court order, law, or legal process, including to furnish information to legal entities for tax and other similar purposes and to respond to any government or regulatory request;
- in the event you violate any law or regulation or engage in any criminal act, to the appropriate law enforcement or regulatory agency; and
- if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Monroe Capital, our investors, or others.

5. Choices About How We Use and Disclose Your Information

We do not control the collection and use of your information collected by the third parties described above. These third parties may provide you with ways to choose not to have your information collected or used in this way. When applicable, these organizations are under contractual obligations to use this data only for providing the services to us and to maintain strict confidentiality over this information. These third parties may, however, aggregate the information they collect with information from their other customers for their own purposes.

6. Accessing, Correcting, and Deleting Your Information

You may contact us at the [Contact Information](#) below or through your Human Resources Department to request access to, correct, or delete any Personal Data that we have collected about you. We may not accommodate a request to change your Personal Data if we believe the change would violate any law or legal requirement or cause the information to be incorrect. We also may not be able to accommodate your request if we believe that it would violate the privacy or other rights of others.

7. Data Security

We have implemented measures designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our information technology systems (including websites provided to you for benefits and retirement administration), you are responsible for keeping this password confidential. We ask you not to share your password to external sites with anyone, and you are not permitted to share your password with anyone for internal Monroe Capital sites.

Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data stored or transmitted on our information technology systems.

8. Jurisdiction-Specific Privacy Rights

The law in some jurisdictions may provide employees with additional rights regarding our use of Personal Data. To learn more about any additional rights that may be applicable to you as a resident of one of these

jurisdictions, please see the privacy addendum for your jurisdiction that is attached to this Personnel Privacy Notice.

For Residents of California

If you are a resident of California, you have the additional rights described in our [California Personnel Privacy Addendum](#).

9. Changes to Our Personnel Privacy Notice

We may change this Personnel Privacy Notice at any time. It is our policy to notify you of any changes we make to our Personnel Privacy Notice. If we make material changes to how we treat our employees' Personal Data, we will notify you by email and/or inter-office mail. The date this Personnel Privacy Notice was last revised is identified at the top of the page.

10. Contact Information

If you have any questions, concerns, complaints or suggestions regarding our Personnel Privacy Notice, have any requests related to your Personal Data pursuant to applicable laws, or otherwise need to contact us, please contact the Human Resources department or through the contact information below.

To Contact Monroe Capital
311 S. Wacker Drive
Suite 6400
Chicago, Illinois 60606-6710
privacy@monroecap.com

ACKNOWLEDGMENT

Acknowledgment of Receipt and Review

I, _____ (employee name), acknowledge that on _____
(date), I received a copy of this Personnel Privacy Notice, dated _____ and that I have read
and understood it.

By: _____

Name: _____

Title: _____

Date: _____

Monroe Capital Privacy Addendum for California Personnel

Effective Date: March 29, 2024

1. Introduction

This Monroe Capital Privacy Addendum for California Personnel (the “**California Personnel Privacy Addendum**”) supplements the information contained in the Personnel Privacy Notice and applies solely to all job applicants to, employees of, owners of, directors of, officers of, and contractors of Monroe Capital who reside in the State of California (“**Personnel**” or “**you**”). We adopt this California Employee Privacy Addendum to comply with the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (collectively, the “**CPRA**”) and any terms defined in the CPRA have the same meaning when used in this California Personnel Privacy Addendum.

2. Scope of this California Personnel Privacy Addendum

This California Personnel Privacy Addendum applies to information that we collect about you that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with you or your device (“**Personal Information**”), and includes all “Sensitive Personal Information” as defined below. However, publicly available information that we collect from government records and deidentified or aggregated information (when deidentified or aggregated as required under the CPRA) are not considered Personal Information and this California Personnel Privacy Addendum does not apply.

This California Personnel Privacy Addendum does not apply outside of the context of your relationship with Monroe Capital as Monroe Capital Personnel or to certain Personal Information that is excluded from the scope of the CPRA, like: (a) health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA); and (b) Personal Information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA) (which may apply to information we collect as part of background checks we may perform as part of your employment or engagement with Monroe Capital), and the Driver’s Privacy Protection Act of 1994. For instance, it does not apply to the extent you are also an investor in a Monroe Capital fund. If you have any questions on whether one of these exceptions apply to your Personal Information, please contact your local Human Resources personnel.

3. Information We Will Collect

We may collect, and over the prior twelve (12) months may have collected, the following categories of Personal Information about our Personnel:

Category	Specific Pieces of Personal Information Collected
Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address (when you access our network resources), email address, username, Social Security number, or other similar identifiers. <i>If provided by you as proof of eligibility to work or as part of your business travel profile, driver’s license number and passport number.</i>

<p>Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).</p>	<p>A name, signature, Social Security number, physical characteristics or description, address, telephone number, insurance policy number, education, employment, employment history, bank account number, credit card number, or health insurance information.</p> <p><i>If provided by you as proof of eligibility to work or as part of your business travel profile, passport number, driver’s license or state identification card number.</i></p> <p>NOTE: <i>Some Personal Information included in this category may overlap with other categories.</i></p>
<p>Protected classification characteristics under California or federal law.</p>	<p>Required: Age (40 years or older). Note: <i>We require your age to verify your identity, run background checks, and to provide you with health and retirement benefits.</i></p> <p>Optional: Race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran, or military status. NOTE: <i>Providing this information is completely optional at your discretion, and we will collect this information only to the extent you choose to provide it in your resume, as part of the equal opportunity forms you fill out when before or during our Personnel Relationship, or as may be provided by a reference or other third party during reference and background checks.</i></p>
<p>Biometric Information</p>	<p>Depending on your role and as required by law: fingerprints.</p>
<p>Internet or other similar network activity.</p>	<p>Browsing history, search history, information on your interaction with a website or application, including any information and services you may access or attempt to access as a result of you use of our IT resources (including via VPN).</p>
<p>Geolocation data.</p>	<p>Physical location or movements.</p>
<p>Sensory data.</p>	<p>Audio; electronic; visual; or similar information.</p>
<p>Professional or employment-related information.</p>	<p>Current or past job history or performance evaluations.</p>
<p>Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).</p>	<p>Education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.</p>

Inferences drawn from other Personal Information.	Profile reflecting your preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.
Sensitive Personal Information (“Sensitive Personal Information”)	<ul style="list-style-type: none"> • Government identifiers (social security; driver’s license; state identification card; or passport number). <i>This may be provided by you as proof of eligibility to work or as part of your travel profile.</i> • Complete account access credentials (user names; account numbers; or card numbers combined with required access/security code or password) (for access to our IT systems); • Racial or ethnic origin (see note below); • Religious or philosophical beliefs (see note below); • Mail, email; or text messages contents not directed to us; • <i>Depending on your role as required by law:</i> Unique identifying biometric information (i.e., fingerprints). • Health; sex life; or sexual orientation information (see note below). <p><i>Note: Providing information about your racial or ethnic origin, religious or philosophical beliefs, and health, sex life, or sexual orientation is completely optional at your discretion, and we will collect this information only to the extent you choose to provide it in your resume, as part of the equal opportunity forms you fill out at the outset of our Personnel Relationship, or as may be provided by a reference or other third party during reference and background checks.</i></p> <p><i>Note: Some roles at Monroe Capital may require that you provide fingerprint or other biometric information as required by applicable law. Monroe Capital will generally only collect this information when required by applicable law.</i></p>

In the preceding twelve (12) months, Monroe Capital has neither “sold” your Personal Information for either monetary or other valuable consideration, nor has it “shared” your Personal Information for cross context behavioral advertising.

4. Sources of Personal Information

We collect Personal Information about you from the sources described in the Personnel Privacy Notice. Monroe Capital will not use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

5. Purposes for Our Collection Personal Information

We may use or disclose the Personal Information we collect for the purposes described in the Personnel Privacy Notice.

Monroe Capital will not collect additional categories of Personal Information or use the Personal Information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

6. Third Parties to Whom Do We Disclose Your Personal Information for Business or Commercial Purposes

Monroe Capital may disclose your Personal Information to third parties for one or more business purposes related to our Personnel Relationship. When we disclose Personal Information to non-affiliated third parties for a business purpose, we enter a contract that describes the purpose, requires the recipient to both keep that Personal Information confidential and not use it for any purpose except for the purposes for which the Personal Information was disclosed and requires the recipient to otherwise comply with the requirements of the CPRA.

Monroe Capital may disclose and, in the preceding twelve (12) months, may have disclosed the following categories of Personal Information of its Monroe Capital Personnel to the following categories of third parties for one or more of the business purposes described below:

Personal Information Category	Categories of Third Party Recipients
Identifiers.	Service providers (who manage our Personnel data, such as our enterprise resource planning systems and other systems that we use to manage our workforce); affiliates, parents, and subsidiary organizations of Monroe Capital; government entities (for taxes and other similar purposes that require us to provide Personal Information to government entities and, if applicable, for your application for background checks and registration with regulators); business partners; credit reporting agencies (for background checks).
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	Service providers (who manage our Personnel data, such as our enterprise resource planning systems and other systems that we use to manage our workforce); affiliates, parents, and subsidiary organizations of Monroe Capital; government entities (for taxes and other similar purposes that require us to provide Personal Information to government entities and, if applicable, for your application for background checks and registration with regulators); business partners; credit reporting agencies (for background checks).
Protected classification characteristics under California or federal law.	Service providers (who manage our Personnel data, such as our enterprise resource planning systems and other systems that we use to manage our workforce); affiliates, parents, and subsidiary organizations of Monroe Capital; government entities (for taxes and other similar purposes that require us to provide Personal Information to government entities and, if applicable, for background checks and registration with regulators); business partners; credit reporting agencies (for background checks).
Biometric information.	Service providers (who manage our Personnel data, such as our enterprise resource planning systems and other systems that we use to manage our workforce); affiliates, parents, and subsidiary organizations of Monroe Capital; government entities (for taxes and other similar purposes that require us to provide Personal Information to government entities and, if applicable, for background checks and registration with

	regulators); business partners; credit reporting agencies (for background checks).
Internet or other similar network activity.	Service providers (who manage our IT systems, such as security providers and IT providers); affiliates, parents, and subsidiary organizations of Monroe Capital.
Geolocation data.	Service providers; affiliates, parents, and subsidiary organizations of Monroe Capital.
Sensory data.	Service providers (who manage our Personnel data, such as our enterprise resource planning systems and other systems that we use to manage our workforce as well as our email providers); affiliates, parents, and subsidiary organizations of Monroe Capital. Depending on your role, we may also disclose your image on our publicly-facing website.
Professional or employment-related information.	Service providers (who manage our Personnel data, such as our enterprise resource planning systems and other systems that we use to manage our workforce); affiliates, parents, and subsidiary organizations of Monroe Capital.
Non-public education information (per the Family Educational Rights and Privacy Act (20 U.S.C. Section 1232g, 34 C.F.R. Part 99)).	Service providers (who manage our Personnel data, such as our enterprise resource planning systems and other systems that we use to manage our workforce); affiliates, parents, and subsidiary organizations of Monroe Capital.
Inferences drawn from other Personal Information.	Service providers (who manage our Personnel data, such as our enterprise resource planning systems and other systems that we use to manage our workforce); affiliates, parents, and subsidiary organizations of Monroe Capital.

Sensitive Personal Information Category	Categories of Third Party Recipients
Government identifiers (social security, driver's license, state identification card, or passport number)	Service providers (who manage our Personnel data, such as our enterprise resource planning systems and other systems that we use to manage our workforce); affiliates, parents, and subsidiary organizations of Monroe Capital; government entities (for taxes and other similar purposes that require us to provide Personal Information to government entities and, if applicable, for your application for security clearance); business partners; credit reporting agencies (for background checks).
Complete account access credentials (user names, account numbers, or card numbers combined with required access/security code or password)	Service providers (who manage our Personnel data, such as our enterprise resource planning systems and other systems that we use to manage our workforce, including IT and other similar providers); and affiliates, parents, and subsidiary organizations of Monroe Capital.

Racial or ethnic origin	Service providers (who manage our Personnel data, such as our enterprise resource planning systems and other systems that we use to manage our workforce); affiliates, parents, and subsidiary organizations of Monroe Capital; government entities (for employment reporting purposes).
Religious or philosophical beliefs	We do not disclose this type of Personal Information.
Unique identifying biometric information	Service providers (who manage our Personnel data, such as our enterprise resource planning systems and other systems that we use to manage our workforce); affiliates, parents, and subsidiary organizations of Monroe Capital; government entities (for taxes and other similar purposes that require us to provide Personal Information to government entities and, if applicable, for background checks and registration with regulators); business partners; credit reporting agencies (for background checks).
Mail, email, or text messages contents not directed to you in your role as a member of Monroe Capital Personnel.	We generally do not know of the existence of any such mail, email, or text messages. However, there should be no expectation of privacy in any such messages received or transmitted using Monroe Capital IT systems. Such messages may be disclosed to service providers; affiliates, parents, and subsidiary organizations of Monroe Capital; and law enforcement personnel is appropriate.
Health, sex life, or sexual orientation information	Service providers (who manage our Personnel data, such as our enterprise resource planning systems and other systems that we use to manage our workforce); and affiliates, parents, and subsidiary organizations of Monroe Capital (if you choose to provide it to us).

We disclose your Personal Information to the categories of third parties listed above for purposes described in the Personnel Privacy Notice and the following business purposes:

- Helping to ensure security and integrity facilities and IT infrastructure to the extent the use of the Personal Information is reasonably necessary and proportionate for these purposes.
- Performing services on behalf of us, including maintaining or servicing accounts; providing Human Resources services; processing or fulfilling payroll and other similar transactions; verifying Monroe Capital Personnel information; performing background checks and security clearance when applicable; providing analytic services; providing storage; or providing similar services on behalf of us.

In addition to the above, we may disclose any or all categories of Personal Information to any third party (including government entities and/or law enforcement entities) as necessary to:

- comply with federal, state, or local laws, or to comply with a court order or subpoena to provide information;
- comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;

- cooperate with law enforcement agencies concerning conduct or activities that we (or one of our service providers’) believe may violate federal, state, or local law;
- comply with certain government agency requests for emergency access to your Personal Information if you are at risk or danger of death or serious physical injury; or
- exercise or defend legal claims.

7. To Whom Do We Sell or Share Your Personal Information

“Sale” of Your Personal Information

In the preceding twelve (12) months, Monroe Capital has not “sold” your Personal Information for either monetary *or* other valuable consideration, and we have not “sold” any Personal Information about minors under the age of 16.

“Sharing” of Your Personal Information for Cross-Context Behavioral Advertising

In the preceding twelve (12) months, Monroe Capital has not “shared” your Personal Information for the purpose of cross-context behavioral advertising, and we have not “shared” any Personal Information about minors under the age of 16.

8. Personnel Data Requests

The CPRA provides Monroe Capital Personnel with specific rights regarding their Personal Information. This section describes these rights and explains how to exercise those rights. You may exercise these rights yourself or through your Authorized Agent. For more information on how you or your Authorized Agent can exercise your rights, please see [Exercising Your CPRA Privacy Rights](#).

- **Right to Know.** You have the right to request that Monroe Capital disclose certain information to you about our collection and use of your Personal Information over the past 12 months (a “**Right to Know**” request). This includes: (a) the categories of Personal Information we have collected about you; (b) the categories of sources from which that Personal Information came from; (c) our purposes for collecting this Personal Information; (d) the categories of third parties with whom we have shared your Personal Information; and (e) if we have “sold” or “shared” or disclosed your Personal Information, a list of categories of third parties to whom we “sold” or “shared” your Personal Information, and a separate list of the categories of third parties to whom we disclosed your Personal Information to. You must specifically describe if you are making a Right to Know request or a Data Portability Request. If you would like to make both a Right to Know Consumer Request and a Data Portability Consumer Request you must make both requests clear in your request. If it is not reasonably clear from your request, we will only process your request as a Right to Know request. You may make a Right to Know or a Data Portability Consumer Request a total of two (2) times within a 12-month period at no charge.
- **Access to Specific Pieces of Information (Data Portability).** You also have the right to request that Monroe Capital provide you with a copy of the specific pieces of Personal Information that we have collected about you, including any Personal Information that we have created or otherwise received from a third party about you (a “**Data Portability**” request). If you make a Data Portability Consumer Request electronically, we will provide you with a copy of your Personal Information in a portable and, to the extent technically feasible, readily reusable format that allows you to transmit the Personal Information to another third party. You must specifically describe if

you are making a Right to Know request or a Data Portability request. If you would like to make both a Right to Know Consumer Request and a Data Portability Consumer Request you must make both requests clear in your request. If it is not reasonably clear from your request, we will only process your request as a Right to Know request. We will not disclose your social security number, driver's license number or other government-issued identification number, financial account number, health insurance or medical identification number, or your account password or security question or answers in response to a Data Portability Consumer Request. We will also not provide this information if the disclosure would create a substantial, articulable, and unreasonable risk to your Personal Information, your Personnel relationship with Monroe Capital, or the security of our systems or networks. We will also not disclose any Personal Information that may be subject to another exception under the CPRA. If we are unable to disclose certain pieces of your Personal Information, we will describe generally the types of personal information that we were unable to disclose and provide you a description of the reason we are unable to disclose it. You may make a Right to Know or a Data Portability Consumer Request a total of two (2) times within a 12-month period at no charge, although you may have other rights to access certain pieces of your Personal Information under applicable labor and employment laws.

- **Correction.** You have the right to request that we correct any incorrect Personal Information about you to ensure that it is complete, accurate, and as current as possible. You may review and correct some Personal Information about yourself by accessing your human resources profile page on Monroe Capital's Human Resources systems made available to you (which may be provided directly by Monroe Capital or through the use of a third party). You may also request that we correct the Personal Information we have about you as described below under [Exercising Your CPRA Privacy Rights](#). In some cases, we may require you to provide reasonable documentation to show that the Personal Information we have about you is incorrect and what the correct Personal Information may be. We may also not be able to accommodate your request if we believe it would violate any law or legal requirement or cause the information to be incorrect.
- **Deletion.** You have the right to request that Monroe Capital delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your Consumer Request (see [Exercising Your CPRA Privacy Rights](#)), we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies pursuant to the CPRA. Some exceptions to your right to delete include if we are required to retain your Personal Information to maintain your Personnel relationship with us, to detect security incidents or protect against other malicious activities, and to comply with legal obligations. We may also retain your Personal Information for other internal and lawful uses that are compatible with the context in which we collected it.
- **Non-Discrimination.** We will not discriminate against you for exercising any of your CPRA rights. Unless permitted by the CPRA, we will not do any of the following as a result of you exercising your CPRA rights: (a) deny you employment or other similar relationship as Monroe Capital Personnel; (b) provide you with different compensation, benefits, work hours, or terms of employment or other similar relationship as Monroe Capital Personnel; or (c) suggest that you may receive different compensation, benefits, work hours, or terms of employment or other similar relationship as Monroe Capital Personnel or be denied employment or other similar relationship as Monroe Capital Personnel. You may, however, receive certain discounts from benefits providers for providing your Personal Information, such as discounts on health or other insurance.

Exercising Your CPRA Privacy Rights

To exercise the rights described above, please submit a request (a “**Consumer Request**”) to us by either:

- Emailing us at privacy@MonroeCap.com.
- Contacting the HR department.
- Accessing your human resources profile on Monroe Capital’s HR systems made available to you (which may be provided by Monroe Capital or through a third-party human resources management provider). Note that this may only provide limited abilities to update or access your Personal Information due to security reasons – for all other Consumer Requests, contact HR through one of the above methods.

If you fail to make your Consumer Request in accordance with this California Personnel Privacy Addendum, we may either treat your request as if it had been submitted with our methods described above or provide you with information on how to submit the request or remedy any deficiencies with your request.

Only you, or your Authorized Agent that you authorize to act on your behalf, may make a Consumer Request related to your Personal Information. To designate an Authorized Agent, see [Authorized Agents](#) below.

All Consumer Requests must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected Personal Information or an Authorized Representative of such a person. This may include:
 - Showing your badge, if you make your request live.
 - Providing other information about you (like verifying the last digits of your SSN, bank account number, or other information).
 - Calling from an internal phone with call back or other verification (such as video).
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with Personal Information if we cannot verify your identity or authority to make the request and confirm which Personal Information relates to you or the individual for whom you are making the request as their Authorized Agent.

We will only use Personal Information provided in a Consumer Request to verify the requestor’s identity or authority to make the request.

Authorized Agents

You may authorize your agent to exercise your rights under the CPRA on your behalf by registering your agent with the California Secretary of State (an “**Authorized Agent**”). You may also provide your Authorized Agent with power of attorney to exercise your rights in accordance with applicable laws. We may request that your Authorized Agent submit proof of identity and that they have been authorized exercise your rights on your behalf. We may deny a request from your Authorized Agent to exercise your

rights on your behalf if they fail to submit adequate proof of identity or adequate proof that they have the authority to exercise your rights.

Response Timing and Format

We will respond to a Consumer Request within ten (10) business days of its receipt. We will generally process these requests within forty-five (45) days of its receipt. If we require more time (up to an additional 45 days), we will inform you of the reason and extension period in writing.

In response to a Right to Know or Data Portability Consumer Request, we will provide you with all relevant information we have collected or maintained about you on or after January 1, 2022, unless an exception applies. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For Data Portability Consumer Requests, we will select a format to provide your Personal Information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance, such as a CSV file (for structured data).

We do not charge a fee to process or respond to your Consumer Request unless it is excessive, repetitive, or manifestly unfounded. We reserve the right to consider more than two (2) total Right to Know or Data Portability Consumer Requests in a twelve (12) month period to be repetitive and/or excessive and require a fee. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

9. Your Choices Regarding our Use and Disclosure of Your Sensitive Personal Information

We do not use or disclose your Sensitive Personal Information for any purpose other than the following:

- To provide the employment relationship as reasonably expected by an average consumer who wishes to have a Monroe Capital Personnel relationship with us;
- To detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted Personal Information, provided that our use of your Personal Information is reasonably necessary and proportionate for such purposes;
- To resist malicious, deceptive, fraudulent, or illegal actions directed at Monroe Capital and to prosecute those responsible for those actions, provided that our use of your Personal Information is reasonably necessary and proportionate for this purpose;
- To ensure the safety of natural persons, provided that our use of your Personal Information is reasonably necessary and proportionate for this purpose;
- For short-term, transient use;
- To perform services on behalf of us, such as maintaining or servicing accounts, providing workforce services, verifying personnel information, processing payments, providing financing, providing analytic services, providing storage, or providing similar services on behalf of us; and
- To verify or maintain the quality or safety of a service or device that is owned, manufactured, manufactured for, or controlled by us, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by us.

In addition, we may also use or disclose your Sensitive Personal Information for the following purposes:

- As necessary to comply with federal, state, or local laws or comply with a court order or subpoena to provide information;
- To comply with a civil, criminal, or regulatory inquiry, investigation, subpoena, or summons by federal, state, or local authorities;
- To cooperate with law enforcement agencies concerning conduct or activity that We may reasonably and in good faith believe may violate federal, state, or local law;
- To cooperate with a government agency request for emergency access to Personal Information (including Sensitive Personal Information) if a natural person is at risk or danger of death or serious physical injury; and
- To exercise or defend legal claims.

Because we only use your Sensitive Personal Information for the purposes above as enumerated in the CPRA, we are not required to, and do not, provide you with any right to limit the use of your Sensitive Personal Information for only the above uses.

10. Personal Information Retention Periods

For all categories of Personal Information described above, we will retain your Personal Information: for the longer of (a) (i) if you are not retained by Monroe Capital, for 1 year as of the last date of any action on your application; or (ii) if you are retained by Monroe Capital, for three (3) years after the conclusion of your Monroe Capital Personnel Relationship, or (b) any time required by applicable law for the type of document that contains your Personal Information. However, we may also retain any or all categories of Personal Information when your information is subject to one of the following exceptions:

- When stored in our backup and disaster recovery systems. Your Personal Information will be deleted when the backup media your Personal Information is stored on expires or when our disaster recovery systems are updated.
- When necessary for us to exercise or defend legal claims.
- When necessary to comply with a legal obligation.
- When necessary to help ensure the security and integrity of our Website and IT systems.

11. Changes to this California Employee Privacy Addendum

Monroe Capital reserves the right to amend this California Personnel Privacy Addendum at our discretion and at any time. When we make changes to this California Personnel Privacy Addendum, we will notify you regarding updated notice through Monroe Capital communication channels, including through email or paper notices.

12. Contact Information

If you have any questions, concerns, complaints, or suggestions regarding this California Employee Privacy Addendum and the ways in which Monroe Capital collects and uses your information described above, please contact the Human Resources department or use Monroe Capital's contact information provided in the Personnel Privacy Notice.