

PRIVACY POLICY

Effective Date: January 1, 2023

Last Updated: January 1, 2023

This Privacy Policy (this “Privacy Policy”) describes how 3 Boomerang Capital, LP (together with its affiliates, “3BC” or “us,” “we” or “our”) collects, uses, and stores your information through this website and all other websites operated on our behalf (collectively, the “Sites”). This Privacy Policy also applies to information we may collect about you through other means, such as offline sources.

This Privacy Policy also does not address 3BC’s privacy practices concerning any nonpublic personal information we collect as to investors; 3BC addresses those practices in separate notices sent to investors or potential investors.

By using the Sites, you accept the terms of this Privacy Policy regarding our collection, use, and sharing of your information.

Changes to this Policy: 3BC reserves the right to modify, amend, add to, replace or remove this Privacy Policy at any time. Any material changes we may make to this Privacy Policy in the future will be posted to the Sites. If you continue to use the Sites after these updates are posted, you agree to the revised Privacy Policy. We encourage you to regularly review this page to understand our current privacy practices.

Sources of Personal Information

Personal information is information that identifies, relates to, or could reasonably be linked with you. We may collect your personal information from the following sources:

1. **Information you provide to us**, such as when you fill out our contact form.
2. **Information automatically collected through the Sites**, such as when you interact with the Sites.
3. **Information from third-parties**, such as from public sources, or from other parties.

Personal Information We Collect

Depending on your interactions with us, we may collect the following personal information:

1. **Identifiers**, such as your name and email address.
2. **Internet or other electronic activity information**, such as your Internet Protocol (“IP”) address or location information, activity or usage information, and device information, such as hardware, operating system, browser, and website preferences. We use cookies and other data collection technologies to gather such information. For more information on our use of such technologies, please see the “Cookies and Other Data Collection Technologies” section below.
3. **Professional or employment-related information**, such as your employer.
4. **Inferences** drawn from any of the information we collect.

If we ask you to provide any other personal information not described above, then the personal information we will ask you to provide, and the reasons why we ask you to provide it, will be made clear to you at the point we collect your personal information.

How We Use Your Personal Information

1. To provide you with our services and for our internal research and services improvement purposes
2. To administer the Sites and personalize and improve your experience with the Sites
3. To communicate with you and inform you about services that may be of interest to you
4. For compliance with our legal and regulatory obligations, exercising and defending legal claims, or for safety or security reasons

Disclosure of Your Personal Information

We may disclose your personal information to the following parties:

1. **With our affiliates and subsidiaries.**
2. **With Service Providers.** We may disclose your personal information with our service providers in connection with our business, including to maintain the Sites and provide services. It is our policy to require our service providers to keep personal information confidential and to not use personal information outside of our business relationship.
3. **Sales and Acquisitions.** We may disclose your personal information with a third party in the event of a merger, acquisition, reorganization, sale of assets, or similar transaction, or in the event of bankruptcy.
4. **As Required By Law or In Connection With Legal Rights.** We may disclose your personal information if, in our sole discretion, we believe it reasonable or necessary to (a) comply with the law or legal requirements, (b) prevent illicit or unethical activity, (c) protect and defend our, your, or others' rights, property, safety, or interests, or (iv) detect, prevent, or respond to fraud, misuse of the Sites, or other violations of law.
5. **Entities To Which You Have Provided Consent to the Disclosure.** We may otherwise disclose your personal information if we have your consent.

Legal basis for processing personal information (EEA and UK visitors only)

If you are a visitor from the European Economic Area (EEA) or the United Kingdom (UK), our legal basis for collecting and using the personal information described above will depend on the personal information concerned and the specific context in which we collect it.

However, we will normally collect personal information from you only where we have your consent to do so, where we need the personal information to perform a contract with you, or where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In some cases, we may also have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person.

If we ask you to provide personal information to comply with a legal requirement or to perform a contract with you, we will make this clear at the relevant time and advise you whether the provision of your personal information is mandatory or not (as well as of the possible consequences if you do not provide your personal information).

Similarly, if we collect and use your personal information in reliance on our legitimate interests (or those of any third party), we will make clear to you at the relevant time what those legitimate interests are.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the **Contact Us** heading below.

International Transfers of your Personal Information

The personal information we collect may be transferred to and stored in countries outside of the jurisdiction you are in where we and our third-party service providers have operations, including in the United States. If you are accessing our services from the EEA or UK, in the event of such a transfer, we ensure that: (i) the personal information is transferred to countries recognized as offering an equivalent level of protection; or (ii) the transfer is made pursuant to appropriate safeguards, such as the Standard Contractual Clauses adopted by the European Commission or as may be applicable, the equivalent clauses approved by the UK Government. For more information on the transfer safeguards we rely on and where they have been made available please contact us by using the details in the [**Contact Us**] heading below.

Your data protection rights (EEA and UK visitors only)

If you are a resident of the EEA or the UK, you have the following data protection rights:

If you wish to access, correct, update or request deletion of your personal information, you can do so at any time by contacting us using the contact details provided under the **Contact Us** heading below.

In addition, you can object to processing of your personal information, ask us to restrict processing of your personal information or request portability of your personal information. Again, you can exercise these rights by contacting us using the contact details provided under the **Contact Us** heading below.

You have the right to opt-out of marketing communications we send you at any time. You can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you. To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the **Contact Us** heading below.

Similarly, if we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

You have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the European Economic Area, Switzerland and certain non-European countries (including the US and Canada) are available [here](#).

We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

Cookies and Other Data Collection Technologies

We use cookies and other data collection technologies. Cookies are files through which small amounts of data are sent to your computer from a web server and stored on your computer. The types of personal information that we may collect using these technologies are described in the “The Information We Collect” section above.

If you do not want the Sites to collect information through the use of cookies and similar data collection technologies, your browser may allow you to manage and reject the use of cookies. Each browser is different, so you should check your browser’s “Help” menu to learn more about changing cookie settings. If you reject or block cookies, you may lose some of the functionality or features of the Sites.

Some web browsers have a “do-not-track” feature that informs websites with which the browser communicates to not track the user’s online activity. The Sites do not currently respond to these “do-not-track” signals or similar mechanisms.

For further information about the types of Cookies we use, why, and how you can control Cookies, please see our Cookie Notice [\[link\]](#).

Security and Retention

3BC takes reasonable steps to protect your personal information. However, no information is 100% secure, and we cannot guarantee the security of your information; therefore, we encourage you to also take precautions to protect your personal information.

We retain your information for only as long as we need it to provide our products and services, operate our business, and comply with our legal obligations. When we decide how long to keep your personal information, we keep in mind the nature and sensitivity of the information, the potential harm from unauthorized use, the reasons we collected the personal information, and our legal obligations.

Children’s Privacy

The Sites are not directed to, nor do we knowingly collect or sell personal information from, children under the age of 16. If you believe we have inadvertently collected personal information from a child under the age of 16, please contact us using the contact information listed below.

Third Party Websites

Our Sites may contain links to third party sites. We do not control and are not responsible for any other websites or services, and you use such websites and services at your own risk. We encourage you to read the privacy policies and other legal documents applicable to other websites prior to using them.

Information for Visitors from Outside the United States

3BC is located in the United States and is subject to United States law. If you are accessing the Sites from outside of the United States, please be aware that United States law may have different standards that apply to how personal information may be used than in your jurisdiction. By accessing and using the Sites, you understand that your personal information will be processed in the United States.

Updates to this Privacy Policy

We may update this Privacy Policy from time to time in response to changing legal, technical or business developments. When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Policy changes if and where this is required by applicable data protection laws.

You can see when this Privacy Policy was last updated by checking the “last updated” date displayed at the top of this Privacy Policy.