

## Atium Limited – Privacy Policy

01 March 2021

This Privacy Policy applies to the information Atium Limited collects from you during the course of registering with Atium Limited and during the course of your use of the Atium Limited Websites and Atium Limited Services.

References to terms used but not defined herein shall have the meaning ascribed to them in the Atium Limited Terms of Use Agreement.

The term “Personal Information” refers to information that personally identifies you as an individual.

### 1. Changes to this Privacy Policy

Atium Limited reserves the right, in its sole discretion, to modify, amend or otherwise change this Privacy Policy from time to time. Atium Limited will advise registered users of changes to this Privacy Policy and the effective date of the changes by posting the revised Privacy Policy to Atium Limited Websites. You agree that posting of a revised Privacy Policy constitutes actual notice to you of the revised policy.

### 2. Information

#### a) Registration Information

Atium Limited may collect from you certain institutional information and certain personal information, and may request additional institutional information and personal information from time to time, in order to register your institution with and prior to allowing your institution to use certain portions of Atium Limited Websites and Atium Limited Services as well as for the continued use of Atium Limited Websites and Atium Limited Services.

#### b) Usage Information

Atium Limited also collects and maintains “usage information” from and during the course of your institution’s doing business with Atium Limited, including the use of Atium Limited Websites and Atium Limited Services. This information includes, among other things,

- i. For submitters of Loan information: various metrics regarding your institution’s submission for loans, your interests as they relate to information of the loans and the manner in which your institution manages and informs potential buyers of the same; and
- ii. for potential buyers of loan: various metrics regarding the loans where you have expressed interest in, including Tenor, Margin, subsector and Amount of Loan.

Additionally, Atium Limited transmits, and facilitates the transmission of, a number of different communications, including emails, and other notifications between and among

- i. purchasers and loan sellers in connection with the purchase and sale of loans over time and
- ii. between Atium Limited and you in connection with your institution’s account and doing business with Atium Limited.

In order to be effective, these communications, which includes the use of email, and other notifications require the transmission of information regarding these loans and certain details regarding your institution’s account and, include, among other things, notifying the applicable parties of newly available loans for purchase or sale, invitations to view loans, among other matters in the administration and performance of the operations of Atium Limited through any Atium Limited Website or Atium Limited Service.

Atium Limited may, in its sole discretion, modify the content of these emails and notifications, including no longer providing them in their entirety or, alternatively, adding additional communications, notifications and emails.

c) Additional Usage Information  
i. Cookies

An internet “cookie” is a small text file created by a web site that stores information on your computer, such as your preferences when visiting that site. Among other matters, Atium Limited uses cookies to enable you to use Atium Limited Websites and Atium Limited Services and is important for ensuring smooth transitions between webpages within and among Atium Limited Websites.

If you choose to block Atium Limited from using cookies in connection with your use of any Atium Limited Website or Atium Limited Service you will adversely affect your ability to use and access certain portions of Atium Limited Websites or use certain Atium Limited Services.

ii. Messaging Services

If you use the Atium Limited messaging system on any Atium Limited Website, you should be aware that any information you submit can be read, collected, or used by other users of these messaging platforms. Atium Limited is not responsible for the information you choose to submit in these forums.

To request removal of your Personal Information, please contact us at [info@LoanDiscovery.com](mailto:info@LoanDiscovery.com). Atium Limited will, after reasonable opportunity to act, make commercially reasonable efforts to remove your personal information from those forums. In some cases, Atium Limited may not be able to remove your personal information and should that occur Atium Limited will make commercially reasonable efforts to advise you promptly of Atium Limited’s inability to remove your personal information.

d) Atium Limited’s Use of Information

Atium Limited requires your institution’s information and your personal information in order to register your institution with Atium Limited and to enable your institution to use or access certain portions of Atium Limited Websites and Atium Limited Services, including transacting business on any Atium Limited Website or through any Atium Limited Service, to enable communications with you and your institution, to verify your and your institution’s identity and to fulfil legal and regulatory requirements. Additionally, Atium Limited requires your institution and personal information in order to maintain the Atium Limited Websites and provide the Atium Limited Services.

Atium Limited will not disclose your personal information to third parties except as described in Atium Limited’s agreements with you or otherwise with your consent.

Examples of when your personal information is shared with third parties include your profile on Atium Limited (which is viewable by other registered users of Atium Limited) or when you send messages using Atium Limited Website’s messaging platform to communicate with other users of Atium Limited. Atium Limited may disclose your personal information from time to time with Atium Limited affiliates, parents and subsidiaries and their employees and agents as part of the operation of its business.

Atium Limited may also disclose your institution’s information and your personal information, if it reasonably believes that it is required by law or necessary to operate Atium Limited’s business, including when necessary to: (1) enforce the Terms of Use; (2) protect and defend Atium Limited’s rights or property; or (3) comply with a court order, warrant, subpoena or other legal process or other legal or regulatory requirements of any governmental authority. In addition, Atium Limited may use your institution’s information and your personal information, for internal purposes, such as fraud and theft prevention, error reporting, development and administration of Atium Limited Websites or Atium Limited Services, data analytics, and compliance with Atium Limited’s legal obligations, policies and procedures.

### 3. Privacy Procedures at Atium Limited

#### a) Limited Access to your Private Information

Atium Limited limits access to your Personal Information to (i) Atium Limited employees; and (ii) those agents of Atium Limited who need to know the information to provide you with access to Atium Limited Websites, to enable you to use Atium Limited Services or to run and operate the businesses of Atium Limited, including Atium Limited Websites and Atium Limited Services. We employ several safeguards the purpose of which is to protect your Personal Information.

Atium Limited uses software, systems and procedures in an effort to provide you with a safe and secure environment for conducting business on any Atium Limited Website or Atium Limited Service and protect your Personal Information. Atium Limited will review, refine and upgrade security technology as new tools, practices, procedures and information becomes available and commercially reasonable to implement.

#### b) Your Obligation to protect your private information

Atium Limited seeks to prevent unauthorized access to your institution's information and your personal information. Central to this effort is ensuring that the information Atium Limited has about you and your institution is accurate and current.

You are responsible for ensuring the accuracy of the information collected by Atium Limited about you and your institution. If at any time you discover inaccuracies in Atium Limited's information or if your institution or personal information changes, please immediately inform Atium Limited of any inaccuracy or change in your institution's information or personal information by, to the extent possible, updating that information through a Atium Limited Website, and if not possible to update through any Atium Limited Website, then by emailing us at [info@LoansDiscovery.com](mailto:info@LoansDiscovery.com).

### 4. Transfer of Information

Your institution's information and your personal information may be transferred to a third party as a result of a sale, including a sale of all or substantially all of Atium Limited's assets, acquisition, merger, reorganization or other similar transaction involving Atium Limited. Atium Limited reserves the right to transfer the information to a third party in connection with any such transaction.

Atium Limited may also transfer this information to any parent entity, any wholly-owned subsidiary of Atium Limited or any wholly-owned subsidiary of any parent entity.

### 5. Supremacy of Terms of Use Agreement

This Privacy Policy does not supersede the Terms of Use Agreement that governs your use of any Atium Limited Website or Atium Limited Service. In the event of any conflict between the Terms of Use Agreement and this Privacy Policy, the Terms of Use Agreement shall control and govern.