

## GDPR Disclosure

Please see below GDPR-related disclosures for EEA Individuals. To the extent there is a conflict between this GDPR Disclosure and any other provision of the BlueMountain Capital Management LLC Privacy Policy, this GDPR Disclosure shall control with respect to EEA Individuals.

Legal Basis and Purpose: BMCM acts as “data controller” of the Contact Information and Other Information collected on the Site for the purposes and under the legal bases described below:

Contact Information: We provide our investment research subscription pursuant to our legitimate interest in providing research materials to interested EEA Individuals. Note that EEA Individuals must affirmatively sign up to receive such materials. Such information will be retained to provide the subscription or to effectuate any “opt-outs” unless deletion of such information is requested.

Other Information: We collect Other Information so that individuals can connect and use the Site, and to maintain security audit logs to remove or defend against malicious visitors or attackers (e.g., thwarting DDOS attacks). This information is logged internally within the web servers that host our Site and stored on an ongoing basis.

Data Transfer: The above Information is transferred to the United States as necessary to provide the subscription and enable or protect the Site, respectively, pursuant to the terms of this Privacy Policy and GDPR Article 49(1)(b). Please also see Business Transfers and Legal Requirements above.

Your GDPR Rights: Natural persons have a right to: (i) request access to, correction and/or erasure of their personal data; (ii) object to processing of their personal data; (iii) restrict processing of their personal data; and (iv) request a copy of their personal data, or have a copy thereof sent to another controller, in a structured, commonly used and machine readable format under the right of data portability. These rights may be exercised by contacting: [LegalNotices@bmcm.com](mailto:LegalNotices@bmcm.com). Natural persons also have the right to lodge a complaint about the processing of their personal data with a data protection authority.

Objecting to Legitimate Interest/Direct Marketing: Natural persons may object to personal data processed pursuant to BMCM’s legitimate interest. In such case, BMCM will no longer process their personal data unless BMCM demonstrates appropriate overriding legitimate grounds for the processing or if needed for the establishment, exercise, or defense of legal claims. Natural persons also may object at any time to processing of their personal data for direct marketing purposes (such as opting out of investment research emails, see Accessing and Modifying Information and Communication Preferences). In such case, their personal data shall no longer be used for that purpose.

EU Representative: BMCM’s representative in the European Union is Blue Mountain Capital Partners (London) LLP, located at 5 Hanover Square, 3rd Floor, London, W1S 1HE (“BM-UK”).