

Privacy Notice

Audax Private Credit Fund, LLC (the “Fund”)

In accordance with applicable data privacy laws, including without limitation, the U.S. Gramm-Leach Bliley Act, and the applicable regulations thereunder (“GLBA”) and the UK General Data Protection Regulation (“GDPR”), Audax PDB Management Company, LLC (“Audax”, “we”, “our”) are providing you with this investor data privacy notice in order to inform you of our privacy policies and procedures with respect to the collection, use, disclosure, safeguarding and retention of your non-public personal information (as defined under GLBA) and personal data (as defined under GDPR). Capitalized terms used herein without definition have the meanings set forth in this Memorandum unless otherwise specified.

This Privacy Notice is intended only for individuals and certain entities that are essentially “alter egos” of individuals (e.g., revocable grantor trusts, IRAs or certain estate planning vehicles).

If you have any questions about this investor data privacy notice, please contact compliance@audaxgroup.com.

Part A: Non-EU and UK Individuals

Our Commitment to Your Privacy: We are sensitive to the privacy concerns of our individual shareholders. We have a long-standing policy of protecting the confidentiality and security of non-public personal information we collect about you. We are providing you this notice to help you better understand why and how we collect certain non-public personal information, the care with which we treat that information, and how we use that information.

Types of Information Collected: The types of non-public personal information we collect will largely depend on the services you have with us and the nature of your investment. The categories of non-public personal information we collect typically include, but is not limited to:

- Identifying information such as name and contact details (including telephone number, email address and residential address), social security number or government ID, demographic information such as date and place of birth, gender, nationality and citizenship;
- Financial information such as bank account details, including account balances, payments made with respect to the account, assets and investment experience/investment preferences;
- Professional and employment related information;
- Information as necessary to comply with any legal or regulatory obligations (e.g., Anti-money laundering and “Know-your-client” checks); and
- Information captured on our web, data room and/or investor portal.

Sources of Non-Public Information: In connection with forming and operating our private investment fund for our shareholders, we collect and maintain non-public personal information from the following sources:

- Information we receive from you in conversations over the telephone, in voicemails, through written correspondence, via e-mail, or on subscription agreements, investor questionnaires, applications or other forms,
- Information about your transactions with us or others, and
- Information captured on our website, including registration information and any information captured via “cookies.”

Disclosure of Information: We do not disclose any non-public personal information about you to anyone, except as permitted by law or regulation and to service providers. We will only disclose non-public personal information for our everyday business purposes, which may include sharing with:

- Fund managers, administrators and qualified custodians to process your transactions, manage your investments, maintain your accounts;
- Third-party service providers as necessary to comply with regulatory obligations, due diligence, distributions or other transactions;
- Our lawyers, auditors and professional advisers to comply with legal and regulatory requirements and requests;
- Our employees in order to provide services to you;
- Government entities to comply with law or regulatory requests;
- Subsidiaries or affiliates;
- With your consent; or
- As otherwise necessary to fulfill the services of your contract.

Retention: We keep your non-public personal information for as long as it is required by us for our legitimate business purposes, to perform our contractual obligations or, where longer, such longer period as is required or permitted by law or regulatory obligations which apply to us.

Former Shareholders: We maintain non-public personal information of our former shareholders and apply the same policies that apply to current shareholders.

Information Security: We consider the protection of non-public personal information to be a sound business practice, and to that end we employ physical, electronic and procedural safeguards to protect your non-public personal information in our possession or under our control.

Do you have to provide us with your non-public personal information: Unless otherwise indicated, you should assume we require your non-public personal information for our everyday business purposes as set forth herein or our compliance with a legal obligation. If you do not wish to provide us with your non-public personal information, it may affect our ability to provide our services to you and manage your investment(s).

Further Information: We reserve the right to change our privacy policies and Part A of this Privacy Notice at any time. The examples contained within Part A of this Privacy Notice are illustrations only and are not intended to be exclusive. Part A of this Privacy Notice is intended to comply with the privacy provisions of applicable United States federal law, GLBA and its applicable regulations (namely, Regulation S-P). You may have additional rights under other foreign or domestic laws that may apply to you.

Part B: EU and UK Individuals

Part B of this Privacy Notice applies to the extent that EU-UK Privacy Laws (as defined below) applies to the processing of personal data by an Authorized Entity (as defined below) or to the extent that a data subject is a resident of the United Kingdom (the “UK”), the European Union (the “EU”) or the European Economic Area (the “EEA”). If Part B of this Privacy Notice applies, the data subject has certain rights with respect to such personal data, as outlined below.

Applicability: Part B of this Privacy Notice applies to the extent that we collect and process personal data under EU-UK Privacy Law (as defined below).

Interpretation: For the purposes of Part B of this Privacy Notice: (i) “EU-UK Privacy Law” means all applicable legislation and regulations relating to the protection of personal data in force from time to time in the EU, the EEA or the UK, including (without limitation) the following: Regulation (EU) 2016/679 (the General Data Protection Regulation) and any national implementing or successor legislation, the GDPR as it forms part of the laws of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union (Withdrawal), Data Protection Act 2018, the Privacy and Electronic Communications (EC Directive) Regulations 2003, any other legislation which implements any other current or future legal act of the EU or UK concerning the protection and processing of personal data (and any amendment or re-enactment of the foregoing); and (ii) “data controller”, “data processor”, “data subject”, “personal data”, and “processing and process” shall have the meanings given to them under EU-UK Privacy Law.

All references to “investor(s)” in Part B of this Privacy Notice shall be to such actual or potential investor(s) and, as applicable, any of such investor(s)’ partners, officers, directors, employees, shareholders, members, managers, ultimate beneficial owners, lenders and affiliates.

Please direct any questions relating to Part B of this Privacy Notice to PDLRequests@audaxgroup.com.

Our Commitment to Your Privacy: We are sensitive to the privacy concerns of our individual shareholders. We have a policy of protecting the confidentiality and security of information we collect about you. We are providing you this notice to help you better understand why and how we collect certain personal data, the care with which we treat that personal data, and how we use that personal data.

Sources of Personal Data: In connection with offering, forming and operating our private investment fund for our shareholders, Audax Private Credit Fund, LLC (the Fund, Audax, their respective Affiliates and, in each case, their respective administrators, legal and other advisors and agents) (the “Authorized Entities”) collect, record, store, adapt, and otherwise process and use personal data either relating to you as the subscriber or to any other person, partner, officer, director, employee, shareholder, ultimate beneficial owner or affiliate of the subscriber or to any other data subject from the following sources:

- Information we receive from you in conversations over the telephone, in voicemails, through written correspondence, via e-mail, or via the Subscription Agreement, investor questionnaires, applications or other forms (including, without limitation, any anti-money laundering, identification, and verification documentation);
- Information about your transactions with the Authorized Entities or others;
- Information captured on the Authorized Entities’ website, including registration information and any information captured via “cookies”; and
- We may also collect personal data relating to you from available public and private sources, including from:
 - publicly available and accessible directories and sources;
 - bankruptcy registers;
 - tax authorities, including those that are based outside the UK and the EEA if the applicable data subject is subject to tax in another jurisdiction;
 - governmental and competent regulatory authorities to whom any Authorized Entity has regulatory obligations;
 - credit agencies; and
 - fraud prevention and detection agencies and organizations.

Any Authorized Entity may process the following categories of personal data:

1. names, dates of birth and birth place and other demographic information;
2. contact details and professional addresses (including physical addresses, email addresses and telephone numbers);
3. account data and other information contained in any document or communication provided by investors to the Authorized Entities (whether directly or indirectly);
4. information regarding your use of our website, fund data room and investor reporting portal (e.g., cookies, browsing history and/or search history);
5. risk tolerance, transaction history, investment experience and investment activity;
6. information regarding an investor’s status under various laws and regulations, including social security number, tax status, income and assets;
7. accounts and transactions with other institutions;

8. information regarding an investor's interest in the Fund, including ownership percentage, capital commitment, income and losses, financial and bank information and any other confidential information relating to an investor;
9. information regarding an investor's citizenship and location of residence;
10. professional and employment-related data;
11. source of funds used to make the investment in the Fund; and
12. anti-money laundering, identification (including passport and drivers' license) and verification documentation.

We may also collect, store and use the following more sensitive types of personal data:

- information about your political opinions (such as your status as a politically exposed person); and
- information about your criminal convictions, allegations, proceedings and offences, including the results of any due diligence checks and any information relating to disqualifying events.

We will only process such sensitive personal data to the extent permitted or required by applicable law.

Any Authorized Entity may, in certain circumstances, combine personal data it receives from an investor with other information that it collects from or about such investor. This will include information collected in an online or offline context. In addition, personal data of investors could be processed and controlled irrespective of whether such investor is admitted to the Fund as a shareholder.

Data Controllers: For the purposes of the LLC Agreement and the Subscription Agreement, one or more of the Authorized Entities are "data controllers" of personal data collected in connection with the Fund. In simple terms, this means such Authorized Entities: (a) "control" the personal data that they or other Authorized Entities collect from investors or other sources; and (b) make certain decisions on how to use and protect such personal data. Please direct any questions relating to Part B of this Privacy Notice to PDLRequests@audaxgroup.com.

Purposes of Processing: We will process the personal data for the following purposes:

- i. for the performance of its contractual and legal obligations, or in connection with the terms of the Subscription Agreement, LLC Agreement and the operation of the Fund, including processing the personal data in connection with credit, anti-money laundering and sanction list checks, identification of a professional investor qualification checks, considering and making decisions about your subscription, conducting appropriate due diligence, and for the purpose of complying with the applicable laws in connection thereto;
- ii. in the Authorized Entities' legitimate business interests (or those of a third party) in relation to communicating with you as necessary in connection with its affairs and generally in connection with its interests in operating the Fund;

- iii. processing the personal data for account administration purposes (and related communication) carried out between the Authorized Entities in preparing for the admission of investors to the Fund;
- iv. ongoing communication with investors (including the negotiation, preparation and execution of documentation) during the process of admitting investors to the Fund;
- v. ongoing administrative, accounting, reporting, recordkeeping and other processes and communications required to operate the business of the Fund in accordance with the LLC Agreement and other applicable documentation between the parties;
- vi. to administer, manage and set up your investor account(s) to allow investors to purchase their holding (of shares) in the Fund (and any other funds operated by the Audax or its affiliates);
- vii. to facilitate the execution, continuation or termination of the contractual relationship between the investors and the Audax and/or the Fund (as applicable);
- viii. to facilitate the transfer of funds, and administering and facilitating any other transaction, between the investors and the Fund;
- ix. to enable any actual or proposed assignee or transferee, participant or sub-participant of the Fund's or the Fund's rights or obligations to evaluate proposed transactions;
- x. to facilitate business asset transactions involving the Fund or Fund-related vehicles;
- xi. where necessary in connection with applicable law;
- xii. to exercise, establish, protect or defend legal rights, property, and safety, including to comply with and enforce our agreements and policies and to respond to suspected illegal activity and threats to our systems and services;
- xiii. to provide and improve our services and business offerings;
- xiv. for IT security and business continuity purposes;
- xv. to prevent and detect fraud;
- xvi. to cooperate with regulators and public authorities;
- xvii. to provide information to a potential purchaser of all or a part of our business; and
- xviii. for any other purposes notified to you, or otherwise agreed with you in writing (as applicable) from time to time.

We monitor communications where the law requires the Authorized Entities' to do so. We also monitor communications, where required to do so, to comply with regulatory rules and practices and, where not prohibited to do so, to protect their respective businesses and the security of their respective systems.

Legal Bases: We rely on the legal bases of contractual necessity and the Authorized Entities' or third parties' legitimate interests e.g. in issuing the subscription and operating their business, in each case, to process the personal data as set out in this Memorandum, the Subscription Agreement and/or the LLC Agreement. From time to time, an Authorized Entity may need to process the personal data on other legal bases, including the following: with consent; to comply with a legal obligation; if it is necessary to protect the vital interests of an investor or other data subjects; or if it is necessary for a task carried out in the public interest.

Disclosure of Information: We will not disclose the personal data to anyone, except as permitted by law or regulation, including to our service providers (including background check companies, anti-fraud service providers, credit reference agencies, debt-collection agencies, tracing agencies,

banks, payment processors, IT and other software providers, survey providers, auditors, agents, consultants, auditors, and legal and other professionals, and administrators who assist us with legal, administrative, financial, operational and other services), delegates (such as, managers, investment advisors, administrators, custodians and distributors), employees, agents, contractors, consultants, professional advisers, data processors, other persons employed and/or retained by us in order to fulfil the purposes described in Part B of this Privacy Notice, and others at your direction. Disclosures may include the transfer the personal data to a Non-Equivalent Country (as defined below), in order to fulfil the purposes described in Part B of this Privacy Notice, in which case we will put appropriate safeguards in place, for example contractual protections, to ensure the lawfulness and security of the transfer. Please contact us using the contact details set out above if you would like further information about this. In addition, we share the personal data with regulatory bodies having competent jurisdiction over us, as well as with law enforcement, judicial bodies, tax authorities, auditors and tax advisers and others (where necessary, or required by or advisable to comply with law, exercise, establish, protect or defend legal rights, property, and safety, including to enforce our agreements and policies and to respond to suspected illegal activity and threats to our systems and services). For the purposes of Part B of this Privacy Notice, “Non-Equivalent Country” shall mean a country or territory other than (i) a member state of the EEA; (ii) the UK; or (iii) a country or territory which has at the relevant time been decided by the European Commission or the Government of the UK (as applicable) in accordance with EU-UK Privacy Law to ensure an adequate level of protection for personal data.

Failure to Disclose Personal Data: Failure on behalf of the subscriber to provide the personal data required by us to fulfil the purposes described in Part B of this Privacy Notice, may result in the Fund being unable to issue or authorize the issuance of the Interest or to provide other services required by the subscriber pursuant to the Subscription Agreement and the LLC Agreement.

Former Shareholders: We maintain personal data of our former shareholders and apply the same policies that apply to current shareholders.

Information Security: We consider the protection of personal data to be a sound business practice, and to that end we employ appropriate technical and organizational measures, including physical, electronic and procedural safeguards to protect your personal data in our possession or under our control.

Retention of Personal Data: We shall not retain the personal data for longer than necessary with regard to the purposes described in Part B of this Privacy Notice. The personal data will be deleted and destroyed within an appropriate timeframe after the engagement with you has ended, unless we are required by law to retain the personal data for a longer period. Personal data will be retained throughout the life cycle of any investment in the Fund. However, some personal data will be retained after a data subject ceases to be an investor in the Fund.

To determine the appropriate retention period for personal data, we consider various factors such as the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your

personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Data Subject Rights: We acknowledge that you may have rights under EU-UK Privacy Law to obtain information about the processing of the personal data by us, and to access and receive a copy of the personal data and/or request rectification or erasure of the personal data and to exercise the right to data portability, and the right not to be subject to automated decision-making. Please note that the right to erasure is not absolute, and it may not always be possible to erase personal data on request, including where the personal data must be retained to comply with a legal obligation. In addition, erasure of the personal data requested to fulfil the purposes described in Part B of this Privacy Notice may result in the inability to provide the services as contemplated by this Memorandum, the LLC Agreement and/or the Subscription Agreement.

In case the data subject to whom the personal data relate disagrees with the way in which his or her personal data is being processed in relation to the Subscription Agreement or the LLC Agreement, the data subject has the right to object to this processing of personal data and request restriction of the processing. Where we rely on consent, data subjects also have the right to withdraw their consent at any time by contacting us using the contact details above. The data subject may also lodge a complaint with the competent data protection supervisory authority (in the United Kingdom, the Information Commissioner). The data subject may raise any request relating to the processing of his or her personal data with Audax.

LAST UPDATED: JULY 11, 2025