

# **ATLANTIC STREET CAPITAL MANAGEMENT, L.L.C.**

## **PRIVACY POLICY**

**AS OF JUNE 2025**

### ***Statement of Policy***

This policy covers Atlantic Street Capital Management, L.L.C. and all private funds managed by Atlantic Street Capital Management, L.L.C. and including the name Atlantic Street such as, Atlantic Street Capital I, L. L. C., Atlantic Street Capital II, LP, Atlantic Street Capital III, LP, Atlantic Street Capital IV, LP, Atlantic Street Capital V, LP, and Shine Continuation Fund, LP (collectively “Atlantic Street,” “we,” or “us”).

Atlantic Street is committed to safeguarding the nonpublic personal information of our clients and investors in accordance with all applicable federal and state laws. Accordingly, we do not share any nonpublic personal information of any current or former client or investor with any unaffiliated third parties, except as permitted by law, as authorized by our clients or investors and/or as described below. In order to provide our investment products and services, we collect and retain certain nonpublic personal information about our clients and investors. In the normal course of servicing our clients and investors, information we collect may be shared with our affiliates and with nonaffiliated companies that perform various functions and services such as broker-dealers, custodians, attorneys, accountants, and financial institutions, as well as governmental agencies.

### ***Collection and Sharing of Information***

We collect nonpublic personal information about you from subscription applications and other forms you provide to us when you open an account or make an investment. We may also obtain nonpublic personal information about you from conversations with you and from your dealings with Atlantic Street. The categories of nonpublic personal information that we collect and may share are:

- Personal identification information, such as your name, birthdate, address, telephone number, email address, social security number or tax identification number, and bank account information.
- Financial information, such as your personal net worth, annual income, and investment holdings.
- Investment acumen and experience, such as your education, occupation, prior investment experience, investment objectives, and risk tolerance.

We will not disclose the above nonpublic personal information about you without your written authorization to our affiliates and to the following types of nonaffiliated companies:

- Financial service providers, such as broker-dealers, custodians, accountants, and financial institutions.
- Legal compliance service providers, such as attorneys and compliance consultants.

- Lenders who provide credit to Atlantic Street or our affiliates.
- Law enforcement, governmental agencies, and other entities where required by law.
- Information technology service providers who provide Atlantic Street technological services.

We also will not disclose nonpublic personal information about you to nonaffiliated companies without your written authorization as permitted by law. Any service provider or company receiving your nonpublic personal information will be authorized and contractually agree to use such information only to perform the services required and as permitted by applicable law.

### ***Safeguarding of Information***

Access to the nonpublic personal information of our investors and clients is restricted to principals and those employees of Atlantic Street who require access to provide or service our investment products and services. Atlantic Street maintains physical, electronic, and procedural safeguards that comply with federal standards to protect non-public personal information. These safeguards include but are not limited to, storage of physical files in limited access areas, shredding of files being destroyed, password-protection protocols for access to electronic files, and data encryption for certain sensitive information stored or transmitted electronically.

### ***Opt Out Right***

Every Client or investor has the right to direct Atlantic Street to not disclose non-public personal information about that Client or investor to a non-affiliated third party. If a Client or investor would like to exercise its right to ‘opt out’ of Atlantic Street’s privacy policy, such Client or investor must provide a written statement exercising that right. This right to opt out may be exercised at any time and will remain in effect until written notice revoking such right is received by Atlantic Street from the Client or investor. However, in the event Atlantic Street encounters circumstances where it is compelled by law to disclose the non-public personal information, Atlantic Street must provide the information even if the Client or investor has exercised its right to opt out.

### ***Rights of Investors***

Investors have the right to access their personal data, correct any inaccuracies in their personal data and request the deletion of their personal data, subject to legal and regulatory requirements.

### ***Breach Notification***

In the event of a data breach, Atlantic Street will notify affected investors in accordance with applicable legal and regulatory requirements.

### ***Continued Adherence***

Even if an account is closed or becomes inactive, Atlantic Street will continue to adhere to its privacy policies and practices.

### ***Contact Information***

Questions or concerns regarding this Privacy Policy should be directed to Baabur Khondker at [baabur@atlanticstreetcapital.com](mailto:baabur@atlanticstreetcapital.com) or (212-372-7000)