

Privacy Notice

Thank you for visiting the website of Kayne Anderson Capital Advisors, L.P. and its affiliates¹ (collectively “we,” “Kayne Anderson” or the “Firm”). An important part of our commitment to you is our respect for your privacy as a user of this website.

This Privacy Notice (“Notice”) provides information about the data that is collected, processed, used, transmitted and stored by Kayne Anderson, and Kayne Anderson’s commitment to appropriately using and protecting the data collected.

Generally speaking, Kayne Anderson collects data about you from the following sources:

- Information we receive about you on applications or other forms;
- Information you provide to us orally; and
- Information about your transactions with us or others.

This Notice applies to both clients and employees of Kayne Anderson and our affiliates. When you use our services, you acknowledge that you have read and understand the contents of this Notice.

Why Does This Policy Exist?

This Notice ensures that Kayne Anderson:

- Complies with data privacy laws and follows industry accepted practices;
- Protects the rights of its clients, employees, and partners; and
- Is open about how the Firm stores and processes personal data.

What Personal Information Do We Collect?

Kayne Anderson does not collect more information than is needed to conduct its business and satisfy any associated regulatory requirements. The following are examples of the types of personal information that we may collect:

- Name, address, phone number and email address;
- Age, occupation and marital status;
- Photo identification including driver’s license or ID card and passport numbers;
- Personal identifier, depending on your country of residence, such as your Social Security Number; and
- Financial information, including investment experience and objectives, account balances and assets, risk tolerance and, in certain jurisdictions, representations required under applicable law or regulation concerning your financial resources.

How Do We Collect Information?

Kayne Anderson collects information from you during the onboarding process. When Kayne collects data from you directly, we will provide Kayne Anderson’s contact information and Kayne

¹ KA Fund Advisors, LLC and KA Credit Advisors, LLC

Anderson's purpose for collecting and processing the data.

Do We Need Consent to Collect Your Data?

By providing your data, you consent to its collection, processing, use, transfer and storage. Your consent can be withdrawn at any time by providing adequate notice (see below) to Kayne Anderson. However, withdrawing your consent may impact your ability to invest in our funds.

How Do We Use Personal Information?

We use your personal information for a variety of business purposes, including but not limited to, the following:

- For our everyday business purposes to administer, facilitate and manage your relationship and/or account(s) with Kayne Anderson.
- To contact you or your designated representative(s) in connection with your relationship and/or account;
- To monitor and audit compliance with our internal policies and procedures; and
- To comply with and enforce applicable legal and regulatory requirements.
- If your relationship with Kayne Anderson ends, we will continue to treat your personal information, to the extent we retain it, as described in this Notice.

Who Do We Share Personal Information With?

Privacy is an integral part of the Firm. We do not disclose your personal information to third parties, except as described in this Notice, and never for compensation. Additionally, we will not share your personal information with third parties without your specific consent or unless Kayne Anderson is required to by law and/or government authorities.

Examples of third parties with whom we may share your personal information include, but are not limited to:

- Authorized service providers who perform services to facilitate your transactions with Kayne Anderson such as, administrators, brokers or custodians, payment processing, email delivery, and other similar services;
- A third party in the event of any contemplated or actual re-organization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stocks; and
- Government authorities in order to comply with appropriate laws and/or requests.

Third parties that we share personal information with are required to maintain the confidentiality of such information and are prohibited from using your personal information for purposes other than those that were specified upon receipt of your data.

What Security Measures Do We Have?

Kayne Anderson has physical, electronic and administrative safeguards in place to help protect data from loss, misuse, unauthorized access, disclosure, alteration, and destruction.

Some features of our information security program are:

- A dedicated group of information security personnel that design, implement and monitor our information security program;
- The use of firewalls and other specialized technology;
- Continuous monitoring of our information and technology systems infrastructure to detect weaknesses and potential intrusions;
- A combination of internal and external reviews of our Internet sites and services;
- Implementing controls to identify, authenticate and authorize access to various systems or sites; and
- Providing Kayne Anderson personnel with relevant training and continually updating our security practices in light of new risks and developments in technology.

Please contact us for a copy of Kayne Anderson's policies for more information on the Firm's information security practices and procedures.

How Long Do We Retain Personal Information?

We will retain your personal information for the period necessary to fulfill our services and the purposes outlined in this Notice unless a longer retention period is required or permitted by law.

How Can You Manage Your Personal Information?

If you would like to request, delete, or update the personal information that you provided us, or exercise any of your data protection rights you may contact us using the contact information below. For your protection, we will need to verify your identity prior to complying with your request. Kayne Anderson does not charge for this service.

Kayne Anderson will make a good faith effort to process your request without undue delay and within the time provided by applicable law. You are also entitled to have Kayne Anderson modify or delete any information that you believe is incorrect or out of date. Kayne Anderson reserves the right to limit or deny access to personal information where providing such information would be unreasonably burdensome or expensive or as otherwise permissible under relevant laws. If Kayne Anderson determines that access cannot be provided in any particular instance, Kayne Anderson will provide the individual requesting access with an explanation of why it has made that determination and a contact point for any further inquiries.

Is My Personal Information Transferred Outside of European Union or European Economic Area?

Information collected by Kayne Anderson is transferred outside of the European Union (EU) or European Economic Area (EEA) to Kayne Anderson servers in the United States. The General Data Protection Regulation (GDPR) was adopted by the EU to protect the privacy of such personal information for all EU individuals.

With respect to the collection, holding, storage, use, and processing of your personal information, Kayne Anderson will:

- Process the data lawfully, fairly and in a transparent way;
- Obtain the information only for valid business purposes and not used in any way that is

- incompatible with those purposes;
- Collect only information that will be relevant to the purposes we have told you about and limited only to those purposes;
- Take reasonable steps to ensure that the information is accurate and kept up to date;
- Maintain the data only as long as necessary, subject to applicable legal or other requirements and
- Use appropriate technical and administrative measures to ensure appropriate security of the data.

Where your personal information is processed by third parties outside the EU, we will ensure appropriate safeguards are in place to adequately protect it, as required by applicable law.

What Rights Do EU and EEA Clients Have?

Under the GDPR, Clients domiciled in the EU or EEA have certain rights with respect to their personal information. In particular, you may have the right to:

- Request access to your personal information;
- Ask to have inaccurate data amended;
- Right to have your personal information deleted;
- Right to withdraw your consent to the processing of your personal information;
- Right to prevent or restrict processing of your personal information for any purpose; and
- Request transfer of personal information to a third party when feasible.

You have the right to receive your personal data that you provided to us in a structured, commonly used and machine-readable format and have the right to transmit such data to another controller without hindrance from us.

Additionally, in the circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless required by law.

Automated Decision Making

We do not use computer algorithms to make automated decisions based on your personal information pursuant to the GDPR. We may process some of your personal information automatically, with the goal of assessing certain personal aspects (profiling), such as to comply with legal or regulatory obligations to combat money laundering, terrorism financing, and offenses that pose a danger to assets.

Where Can This Notice Be Accessed?

This Notice is accessible through:

- Our website: <http://kaynecapital.com/privacy-notice/> and <http://kaynefunds.com/privacy/>;
- Our contracts, agreements, Form ADV Part 2A and other necessary documents; and
- By request through Investor Relations.

Do we use cookies on our public websites or our Investor Portal?

We do not use cookies on our public websites (www.kaynecapital.com and www.kaynefunds.com). We do use cookies on our Investor Portal (investor.kaynecapital.com). The Investor Portal stores a session cookie that allows us to keep your portal session secure; this cookie is invalidated as soon as you logoff. We use another cookie as part of our “remember device” feature of our two-factor login process. This cookie will persist so we can identify your trusted devices when logging in. The data in the cookies is encrypted and we do not include any personal or private information such as name, username, or password.

Contact Us

If you have questions, concerns, or suggestions related to our Notice or our privacy practices, contact the Chief Compliance Officer, Michael O’Neil at:

Kayne Anderson Capital Advisor, L.P.
1800 Avenue of the Stars, Third Floor
Los Angeles, CA 90067

Tel: (800) 638-1496

Website: www.kaynecapital.com and www.kaynefunds.com

We reserve the right to update this Notice at any time to reflect changes in our policies concerning the collection and use of personal information. The revised policy will be effective immediately upon posting to our web site.

The version of this Notice was approved by the Firm’s Senior Management on May 22, 2018.