

BAIN CAPITAL SPECIALTY FINANCE, INC.

PRIVACY POLICY

I. Background – Federal and state regulations require financial institutions to maintain clear, conspicuous and accurate statements of their privacy policies including the information collected about its clients, with whom it shares the information and how it protects the information. Regulation S-P requires Bain Capital Specialty Finance, Inc. (“BCSF”) to distribute this privacy policy to any clients who are natural persons.

II. Overview – BCSF looks to protect nonpublic personal data and provides this policy to clients and investors regardless of whether they are natural persons. The policy set forth below is intended to be compliant with the federal and state regulations as applied to BCSF.

III. Policy Details

- A. **Collection of Information** – From time to time nonpublic personal information may be collected as required for legitimate business purposes. The following are sources of information collected:
1. *Subscription Agreements, Investor Questionnaires and other forms*, which may include an investor’s name, address, social security number and personally identifiable financial information;
 2. *Account History*, including information about an investor’s capital account, such as capital contributions, profit and loss allocations and distributions and withdrawals to and from BCSF;
 3. *Transactions with BCSF*, including information BCSF receives and maintains relating to “new issues” and other securities transactions; and
 4. *Correspondence*, written, telephonic or electronic, between investors and BCSF, any of BCFS’s affiliates or any service providers.

In addition to the sources listed above, BCSF may also collect this information from its internet website.

- B. **Disclosure of Information** – BCSF may share all of the information that it collects, as described above, with current or future affiliates, and relevant departments (for example, IT, security, and legal) in order to service investor accounts or provide investors with information about other products and services offered by BCSF or our affiliates that may be of interest to them.

In addition, BCSF may disclose all of the information that it collects about investors to certain third parties who are not affiliated with BCSF under one or more of the following circumstances:

1. *With Service Providers* – to help provide our services.

5. *As Authorized* – if an investor requests or authorizes disclosure of the information.
6. *As Required by Law* – for example, to cooperate with regulators or law enforcement authorities.
7. *As Permitted by Law* – for example, sharing information with companies that maintain, process or service BCSF or investor accounts or financial products and services or who effect, administer or enforce BCSF or investor transactions is permitted. Among other activities, BCSF may share information with persons acting in a representative or fiduciary capacity on an investor’s behalf. BCSF believes that sharing of information for these purposes is essential to providing investors with necessary or useful services with respect to their accounts.
8. *In Aggregate or De-identified Form* – for example, to provide aggregate data analytics.

- C. **Information Safeguarding Policy** – BCSF has implemented physical, electronic and procedural measures to safeguard against unauthorized disclosures of information (for example, it restricts access to nonpublic personal information about investors internally to those of our employees and our agents who need to know the information to enable us to provide our services to investors).

BAIN CAPITAL SPECIALTY FINANCE, INC.

PRIVACY NOTICE FOR EEA INVESTORS

In this Privacy Notice for EEA Investors (“Privacy Notice”), we provide information to investors in the European Economic Area (“EEA”), as required by the EU General Data Protection Regulation (Regulation 2016/697). The “controller” for your personal data is Bain Capital Specialty Finance, Inc. (Bain Capital Specialty Finance, Inc. is located at 200 Clarendon St, Boston, MA 02116).

We collect the information described in our Privacy Policy Summary (i.e., information from subscription agreements, investor questionnaires and other forms, account history, transactions with Bain Capital Specialty Finance, Inc., and correspondence) and our website privacy policy. You do not have a statutory obligation to provide us with any information, but you do have contractual obligation to do so, and if we do not receive certain information from you, then we may not be able to provide our services to you. If you have any questions regarding whether provision of information is mandatory and the consequences for withholding such information, please contact us using the contact information below.

Bain Capital Specialty Finance Inc. processes the information described as follows:

- **To Honor Our Contractual Commitments to You.** Much of our processing of personal data is to meet our contractual obligations to our investors, or to take steps at investors’ request in anticipation of entering into a contract with them.
- **For Our Legitimate Interests.** In many cases, we handle personal data on the ground that it furthers our legitimate interests in commercial activities, such as the following, in ways that are not overridden by the interests or fundamental rights and freedoms of the affected individuals:
 - Providing our services and maintaining our websites.
 - Analyzing and improving our business.
 - Communications, including reaching out to you and responding to your inquiries about our services.
 - Addressing information security needs and protecting our investors, Bain Capital Specialty Finance, Inc., and others.
 - Managing legal issues.
- **To comply with legal obligations.** We need to use and disclose personal data in certain ways to comply with our legal obligations.

We disclose your information for the purpose described above and as described in our Privacy Policy and our website privacy policy.

Because we operate internationally, many of our computer systems are currently based in the United States. Therefore, if you provide us with your information, you understand that it may be received and processed by us in the United States, where data protection and privacy regulations may not offer the same level of protection as in other parts of the world, such as the EEA. To the extent that we transfer personal data from territories in the EEA or with similar laws to our affiliates or service providers in the United States and elsewhere outside the EEA, we will rely on approved data transfer mechanisms, including standard contractual clauses approved by the European Commission. You may request a copy of any standard contractual clauses relevant to your personal data, if any, using the contact information below.

Depending on where you are located, you may have certain rights with regard to your personal data. To learn more about the personal data we collect about you or the rights you may have, please contact us at the contact information below. If you are located in the EEA, you may contact us to (1) access or rectify your personal data or request its deletion, (2) request a restriction on the processing of your personal data, (3) object to the processing of your personal data or (4) exercise other rights with respect to your personal data, please contact us at the contact information below. While we strongly encourage you to first raise any questions or concerns about your personal data directly with us, you have a right to submit a complaint with the relevant supervisory authority.

We will hold your personal data for as long as necessary to fulfill the purposes set forth in this Privacy Notice or as long as we are legally required or permitted to do so. Your information may remain in copies made for backup and business continuity purposes for additional time. If you choose to provide us with personal data, we encourage you to routinely update the data to ensure that we have accurate and up-to-date information about you.

We may update this Privacy Notice from time to time and will post updated versions to our investor websites and/or include it with our Fund materials. We encourage you to periodically check the latest version of this Privacy Notice. Under certain circumstances (for example, in connection with certain material changes), we may also elect to notify you of changes or updates to our Privacy Notice by additional means, such as sending you an email.

If you have any questions or concerns about this Privacy Notice or its implementation, you may email us at gdprcompliance@baincapital.com or contact us at:

200 Clarendon Street
Boston, Massachusetts 02116 United States

tel: +1 617 516 2000