PRIVACY POLICY

MVC Capital, Inc. (the "Fund") and our investment adviser, The Tokarz Group Adviser LLC (the "Adviser"), seek to provide the Fund's shareholders with top-quality service. While information about you is fundamental to our ability to accomplish this, we fully recognize the importance of keeping personal and account information secure. At the same time, the nature of our businesses may sometimes require that we share certain information about you with other organizations or companies, such as the Adviser. As such, we want you to be aware of how we handle personal information. We note that the Adviser maintains a privacy policy of its own that seeks to safeguard against the unauthorized disclosure of, or access to, investor information. The Fund's policies and procedures for collecting and disclosing personal information are detailed below:

We may collect non-public personal information about you from the following sources:

- Information we receive from you or your authorized representative on applications or other forms, in interviews, or by other means;
- Information we receive from consumer or other reporting agencies, governmental agencies, employers or others;
- Information about your transactions with us, our affiliates or others; and
- Information we collect when you visit our Internet website.

We do not sell client information — whether it is your personal information or the fact that you are an MVC Capital shareholder — to anyone. Nor do we share such information, except, when requested, to make you aware of related financial products and services that we may offer or to provide other information that you may request. In certain instances, we may contract with non-affiliated companies to perform services for us relating to your investment in the Fund. Where necessary, we will disclose information we have about you to these third parties. In all such cases, we provide the third party with only the information necessary to carry out its assigned responsibilities and only for that purpose. In addition, we require these third parties to treat your private information with the same high degree of confidentiality that we do. Finally, we will release information about you if you direct us to do so, if we are compelled by law to do so, or in other legally limited circumstances (for example, to protect your account from fraud).

Our concern for the privacy of the Fund's shareholders naturally extends to those who use the Fund's website, **mvccapital.com**.

mvccapital.com offers customized features that require our use of "HTTP cookies" — tiny pieces of
information that we ask your browser to store. However, we make very limited use of these cookies.
We do not use them to pull data from your hard drive, to learn your email address, or to view data in
cookies created by other websites. We will not share the information in our cookies or give others
access to it — except to help us better serve your investment needs.

You can visit the Fund's website to read more details about its security and privacy features.

We, our Adviser and other service providers, seek to maintain physical, electronic, and procedural safeguards that are designed to comply with applicable regulatory standards to guard your non-personal information.

As required by federal law, we will notify you of our privacy policy annually. We reserve the right to modify this policy at any time, but rest assured that if we do change it, we will inform you promptly. If you have any questions, please feel free to call us at 1-914-701-0310 or visit our website at www.mvccapital.com.