

## FFL PARTNERS, LLC PRIVACY POLICY

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FFL Partners, LLC (“FFL”, “we”, “us”, or “our”) recognizes the importance of maintaining the privacy of information that it receives relating to any individual investor and is committed to protecting the privacy of personally identifiable information (“PII”) of identifiable individuals who visit [fflpartners.com](http://fflpartners.com) (the “Site”) and to whom we make available investment products and services for current and potential investors (the “Service/s”), or express interest in our business. The privacy of your PII is important to us at FFL. This Privacy Policy discloses the privacy practices for FFL and for its Site, and localized versions of that site, including the type of PII collected and tracked, how the information is used, and with whom the information is shared.

In order to provide you with Services you may request, it is necessary for us to possess some PII of yours. Similarly, without some of that information, we cannot inform you about the Services we have available or that you may request (though if you are currently receiving marketing communications from us, you may opt-out of receiving further communications at any time). This Privacy Policy explains our PII policies and practices. It includes, but is not limited to, explanations of the types of PII we may collect about you, the purposes for collecting such information, the circumstances under which we may disclose such information to third parties, the measures we take to secure the confidentiality of such information, your rights regarding your PII, and the way to contact us to exercise those rights.

Your visit to the Site is subject to this Privacy Policy. By visiting the Site, you agree to this Privacy Policy. Amendments to this Privacy Policy will be posted to the Site and/or Services and will be effective when posted. Your continued use of the Services following the posting of any amendment to the Privacy Policy shall constitute your acceptance of such amendments.

## TYPES OF INFORMATION WE COLLECT

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This section explains the PII that may be collected when using our Services, and the other information we may receive from other sources. In this Privacy Policy, the term “PII” refers to the types of information we may collect and use. Some examples are listed below:

- Contact information: name, address, email, telephone number.
- Identification information: signature, date of birth, place of birth, citizenship, location of residence, social security number, taxpayer identification number, driver’s license, passport, other government identification and numbers.
- Background information: information required to perform, or revealed in, know-your-customer (KYC) and anti-money laundering (AML) due diligence, investor accreditation and consents.
- Financial information: assets, income, net worth, amounts and types of investments, risk tolerance, capital account balances, capital commitments, capital contributions, account data, other investment participation information, funds transfer information, beneficiaries, positions, percentages of fund, share or option numbers and values, vesting information, investment history, transaction information, tax status and information, bank account number.
- Investment information: information about your interest in the relevant Investment, including ownership percentage, capital investment, income and losses.
- Recruitment information: resumes, cover letters, employment history, references.
- Technical or account information: electronic device and usage information, internet protocol address, registration information and online account data.

## Sources of Non-Public Information

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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 email and other electronic communications, or on subscription agreements, investor questionnaires, applications or other forms (including, without limitation, any anti-money laundering, identification and verification documentation).
- Information about your transactions with us or others.
- Comments, feedback, posts and other content submitted to FFL.
- Information captured on our website, fund data room and/or investor reporting portal (as applicable), including registration information and information provided through online forms.

## PURPOSES FOR COLLECTING YOUR PII

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You may provide your PII to FFL in order to fulfill a Service. You are then entering a business relationship with FFL and are agreeing to the use of that data by FFL and its affiliated companies, as stated in this Privacy policy. We request PII for a variety of purposes throughout your interaction with FFL, some of which are listed below:

- Recruitment and fulfilling of any employment contract.
- The performance of our contractual and legal obligations (including applicable anti-money laundering, KYC and other related laws and regulations) in assessing your suitability for investing in a fund).
- Ongoing communication with potential investors, their representatives, advisors and agents, (including the negotiation, preparation and signature of documentation) during the process of admitting potential investors to the relevant fund(s) and execution of relate documentation (e.g., the subscription agreement).
- Ongoing communication with you or your designated representative by phone, email, fax, or email.
- The ongoing administrative, accounting, reporting and other processes and communication required to operate our business and/or the relevant fund.
- To administer, manage and set up your investor account(s) to allow you to purchase your holding (of limited partnership interests) in the relevant fund(s).
- To facilitate the execution, continuation or termination of the contractual relationship between you and the Partnership and/or the relevant fund (as applicable).
- To facilitate the transfer of funds, and administering and facilitating any other transaction, between you and the relevant fund.
- To audit and perform verifications related to investor interactions, including but not limited to, verifying the quality and effectiveness of services and compliance.
- To maintain the safety, security and integrity of our products and services, databases, technology assets and business, including to detect security incidents, and protect against malicious, deceptive, fraudulent, or illegal activity.
- To enable any actual or proposed assignee or transferee of the fund(s), to evaluate proposed transactions.
- To facilitate business asset transactions involving the relevant fund.
- To fulfil any legal or regulatory requirement.
- Keeping investors informed about our business generally, including offering opportunities to make investments other than in the relevant fund.
- Any other purpose that has been notified, or has been agreed, in writing.

## LAWFUL BASIS

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There is a need to process PII for the purposes set out in this privacy policy as a matter of contractual necessity under or in connection with the applicable agreement, and in the legitimate interests of FFL to operate their respective businesses. From time to time, FFL may need to process the PII on other legal bases, including: 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. For the purposes listed above, FFL is relying on performance of contractual necessity and legitimate interests.

A failure to provide the PII requested to fulfill the purposes described in this Privacy policy may result in FFL being unable to provide the services in connection with the terms of the subscription agreement.

## DATA STORAGE AND RETENTION

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Your PII will be retained only for as long as the information is needed to fulfill the purposes for which it was collected and processed. We reserve the right to retain and use your PII for as long as necessary to comply with our legal obligations and business requirements and/or to resolve ongoing disputes and enforce our agreements.

## PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION

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The security of your information is important to us. We employ several different technical, administrative, and physical security measures to protect any PII you provide through the Site from unauthorized access or use. Access to such information is restricted to those employees who are trained in the proper handling of client information and have a legitimate business need to access that information. We follow generally accepted standards to protect the PII you submit to us, whether that information is in transit or at rest. You should be aware however, that “perfect security” does not exist on the Internet, and there is always the risk that unauthorized persons may access or use your personal information. You use this Site and send us such information at your own risk.

## OUR SITE

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In general, we automatically gather certain information from the Site visitors, such as the number and frequency of your visits, through server logs. This information may include the URL of the last and next website you visit, your browser and operating system, your IP address, how long you spend on the Site, and what pages you view there. We may use this information on an aggregate basis to improve the Site, provide visitors with customized services and information, and for other similar purposes. We may also use this information to understand better how our visitors use the Site and to research our visitors' demographics, interests, and behavior.

We do not collect any personally identifiable information from you through the Site except as described below. Personally identifiable information is information that personally identifies you, such as your name, postal address, or e-mail address (or other information that is associated by us with such above information).

We are not responsible for any other websites accessible from or linked to the Site, including their privacy policies or information collection practices. To understand more about their practices, please review the privacy policy or policies located on their website.

Please be advised that the virtual data room portals that can be accessed through links on the Site by investors in funds managed by FFL are maintained by third-party service providers, whose privacy policies apply to those portals and to the personal information you provide in activating and using your account to access those portals; the third party service providers only inform us of who has access to the portals they operate. We encourage you to review those privacy policies.

We will collect any other personally identifiable information from you if you voluntarily provide it through the Site - such as by providing your e-mail address and other personal information to receive further information about us - and will use such personally identifiable information for the purpose of processing and responding to your inquiries and requests and to improve the Site and offerings.

We may share your non-personally identifiable information with others, such as investors, for informational or promotional purposes. Non-personally identifiable information is information that does not personally identify you, including anonymous information and aggregate data. For more information on this, refer to Sharing Your PII below.

## AUTOMATED DECISION MAKING

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We do not use automated processing, including profiling, to make decisions that will have either legal or material effects on the individuals from whom we collect and process PII.

## SHARING YOUR PII

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Your PII may be combined with information we receive from other sources, or it may be provided to other organizations we work with. This section details that sharing of your PII.

We may share your PII with our affiliates, business partners, and other third parties. We may do so for the purposes of operating our business, delivering and improving the Services we provide to you, as well as for other legitimate purposes permitted by applicable law such as sending marketing and other communications related to our business.

We may share your PII with third parties for a variety of additional purposes including, but not limited to:

- Within FFL and our affiliates for data processing or storage purposes.
- With our affiliates and service providers as allowed by applicable law or regulation, including any anti-money laundering or anti-terrorist laws or regulations.
- With other limited partners in conjunction with the preparation and delivery of financial statements, drawdown notices and schedules to various agreements.
- With business partners and suppliers to facilitate our Services and perform functions on our behalf, such as sending postal mail and e-mail and providing technical, analytical, and hosting functions for the Site.
- With business partners and suppliers, including our accountants, attorneys, placement agents and other service providers in the ordinary course of business, to provide Services and help facilitate transactions (including financial statements, marketing communications, and tax documents).
- In response to a request from law enforcement, government authorities, or other third parties as necessary to comply with legal process or to meet national security requirements.

If FFL merges with or transfers substantially all of its assets to another entity, FFL has the right to share your PII with that entity, to the extent lawfully permissible.

We will not otherwise share your PII, except as required by law, requested by governmental entity or law enforcement authority, subpoena, court order or discovery request, or when we otherwise believe in good faith that such disclosure is necessary or appropriate in connection with any activity that violates the law (including relating to intellectual property, fraud, contracts, and privacy) or may expose us to liability. We can (and you authorize us to do) disclose any of your information in such circumstances.

## TRANSFERS OF PII

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Your PII may be transferred, processed and/or stored in a country other than the one in which your PII is collected. When transferring your PII to the US or other countries, we have implemented procedures to ensure that appropriate safeguards are in place to protect the PII regardless of where it is being transferred to.

FFL may disclose PII, where permitted by law, to other service providers, prospective or current investors in applicable funds, employees, agents, contractors, consultants, professional advisers, lenders, data processors and persons employed and/or retained by them in order to fulfill the purposes described in this Privacy Notice. In addition, FFL may share PII with regulatory bodies having competent jurisdiction over them, as well as with tax authorities, auditors and tax advisors (where necessary or required by law, rule or regulation).

FFL may transfer PII to a non-equivalent country (a country or territory other than (i) a member state of the EEA; or (ii) a country or territory which has at the relevant time been decided by the European Commission in accordance with EU law to ensure an adequate level of protection for PII), in order to fulfill the purposes described in this Privacy Notice and in accordance with applicable law, rule or regulation, including where such transfer is a matter of contractual necessity to enter into, perform and administer agreements, and to implement requested pre-contractual measures.

## PRIVACY NOTICE SUPPLEMENT FOR EU RESIDENTS

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The European Union's General Data Protection Regulation ("GDPR") is a sweeping piece of legislation that grants EU residents increased control over their PII. The GDPR allows consumers to access their PII and find out details of how that data is processed, to rectify inaccurate PII, to have their data erased (when certain conditions are met), to restrict processing of their data, and more. It requires affected companies to create processes to comply with and facilitate consumer data requests, to update their privacy policies, and to ensure that PII is secured.

Specifically, the GDPR and other national privacy laws provide data subjects with certain rights regarding their PII. If

you are an individual who resides in the EU and whose PII is collected and processed by FFL, you have the right to:

- Request access to your data.
- Rectify your data.
- Take your data (in a readable, “portable” format) to another service provider.
- Erase your PII.
- Restrict or object to the processing of your PII.
- Lodge a complaint with a Member State Supervisory Authority.
- Withdraw previously given consent to collect and process PII (which will not impact PII processed before the withdrawal).

## PRIVACY NOTICE OF COLLECTION SUPPLEMENT FOR CALIFORNIA RESIDENTS

This Notice supplements the Privacy Notice set forth above with respect to specific rights granted under the California Consumer Privacy Act of 2018 (“CCPA”) to natural person California residents and provides information regarding how such California residents can exercise their rights under the CCPA. If you are a California resident and it is determined that the CCPA applies to you, this supplement details those rights, how you may exercise them, and what FFL will do in response.

*Categories of Personal Information We Collect:* We collect or have collected within the last twelve (12) months some or all of the following categories of personal information from individuals:

Category	Examples	Collected
A. Identifiers	Name, contact details and address (including physical address, email address and Internet Protocol address), and other identification (including social security number, passport number and driver’s license or state identification card number).	YES
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Telephone number, signature, bank account number, other financial information (including accounts and transactions with other institutions and anti-money laundering information), and verification documentation and information regarding investors’ status under various laws and regulations (including social security number, tax status, income and assets).	YES
C. Protected classification characteristics under California or federal law	Date of birth, citizenship and birthplace.	YES
D. Commercial information	Account data and other information contained in any document provided by investors to authorized service providers (whether directly or indirectly), risk tolerance, transaction history, investment experience and investment activity, information regarding a potential and/or actual investment in the applicable fund(s), including ownership percentage, capital investment, income and losses, source of funds used to make the investment in the applicable fund(s).	YES
E. Internet or other similar network activity	Use of our website, fund data room and investor reporting portal (e.g., cookies, browsing history and/or search history), as well as information you provide to us when you correspond with us in relation to inquiries.	YES
F. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	YES

G. Sensitive Personal Information (see further information on use of sensitive personal information below)	Social security, driver's license, state identification card, or passport numbers; account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin; religious or philosophical beliefs; union membership; genetic data; the contents of a consumer's mail, email, and text messages unless you are the intended recipient of the communication; biometric information for the purpose of uniquely identifying a consumer; and personal information collected and analyzed concerning a consumer's health, sex life, or sexual orientation.	YES, as to the following types of information: social security, driver's license, state identification card, or passport numbers; account log-in, financial account in combination with any required security or access code password; or credentials allowing access to an account only.
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*Purposes for Collecting Personal Information:* We collect personal information for the business or commercial purposes and from the sources set forth in "Purposes for Collecting Personal Information" and "Sources of Non-Public Information," respectively, in the Privacy Notice above.

*Use and Disclosure of Sensitive Personal Data:* FFL will only **use and disclose sensitive personal data** for a purpose for which it was originally collected. Unless we request it, we ask that you not send us, or disclose, any sensitive personal data. We do not collect or use sensitive personal information other than:

- To perform services, or provide goods, as would reasonably be expected by an average consumer who requests those goods or services.
- As reasonably necessary and proportionate to detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted personal information.
- As reasonably necessary and proportionate to resist malicious, deceptive, fraudulent, or illegal actions directed at us and to prosecute those responsible for such actions.
- For short-term, transient use (but not in a manner that discloses such information to another third party or is used to build a profile of you or otherwise alter your experience outside of your current interaction with us).
- To perform services on behalf of our business.
- To verify or maintain the quality or safety of a service or to improve, upgrade, or enhance such service or device.
- To collect or process sensitive personal information where such collection or processing is not for the purpose of inferring characteristics about a consumer.

*Retention:* We retain the categories of personal information set forth above in the "Information We Collect" section of this California Privacy Notice Supplement only as long as is reasonably necessary for those business or commercial purposes set forth in "Purposes for Collecting Personal Information" in the Privacy Notice above, except as may be required under applicable law, court order or government regulations.

*Disclosure of Information:* We do not and will not sell your PII. We do not share for the purpose of cross-context behavioral advertising (as such term is defined in the CCPA) any of the personal information we collect about you to third parties.

We disclose or within the last twelve (12) months have disclosed personal information collected from you for

a business or commercial purpose to the categories of third parties indicated in the chart below. We may also disclose your information to other parties as may be required by law or regulation, or in response to regulatory inquiries.

Personal Information Category	Category of Third-Party Recipients
A. Identifiers	Administrators, accountants, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, AIFMD service providers, AML service providers, consultants and placement agents, affiliates for data processing or storage purposes.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Administrators, accountants, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, AIFMD service providers, AML service providers, consultants and placement agents, affiliates for data processing or storage purposes.
C. Protected classification characteristics under California or federal law	Administrators, accountants, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, AML service providers, consultants and placement agents, affiliates for data processing or storage purposes.
D. Commercial information	Administrators, accountants, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, AIFMD service providers, AML service providers, consultants and placement agents, affiliates for data processing or storage purposes.
E. Internet or other similar network activity	Administrators, accountants, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents, affiliates for data processing or storage purposes.
F. Sensitive Personal Information	Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, AML service providers, consultants and placement agents.

*Rights under the CCPA*

*Deletion Rights:* You have the right to request that we delete any of your personal information that we retain, subject to certain exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations. We will notify you in writing if we cannot comply with a specific request and provide an explanation of the reasons.

*Disclosure and Access Rights:* You have the right to request that we disclose to you certain information regarding our collection, use, disclosure and sale of personal information specific to you. Such information includes:

- The categories of personal information we collected about you;
- The categories of sources from which the personal information is collected;
- Our business or commercial purpose for collecting such personal information;



- Categories of third parties with whom we disclose the personal information;
- The specific pieces of personal information we have collected about you; and
- Whether we disclosed your personal information to a third party, and if so, the categories of personal information that each recipient obtained.

*Correction Right:* You have the right to request that we correct any inaccuracies in the personal information that we retain, subject to certain statutory exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations. We will notify you in writing if we cannot comply with a specific request and provide an explanation of the reasons.

*No Discrimination:* We will not discriminate against you for exercising your rights under the CCPA, including by denying service, suggesting that you will receive, or charging, different rates for services or suggesting that you will receive, or providing, a different level or quality of service to you.

*How to Exercise Your Rights:* To exercise any of your rights under the CCPA, or to access this notice in an alternative format, please submit a request using any of the methods set forth below.

## QUESTIONS OR CONCERNS AND EXERCISING YOUR DATA SUBJECT RIGHTS

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If you have any questions or concerns regarding the information in this privacy policy, or would like to exercise any of your rights set forth in this privacy policy, please contact 888-409-0523 or [contact@fflpartners.com](mailto:contact@fflpartners.com). Please include a description of what right you want to exercise and the information to which your request relates. Please note that you may only make a disclosure request twice within a 12- month period.

### Verifying Your Identity

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If you choose to contact us with a request, you will need to provide us with identifying information that matches the PII we currently have about you.

### Authorized Agent

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You have the right to appoint an authorized agent to exercise your rights on your behalf. If you would like to do so, please contact [contact@fflpartners.com](mailto:contact@fflpartners.com).

## Accessibility Information

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For consumers with disabilities who need to access this policy in an alternative format, please contact:  
[contact@fflpartners.com](mailto:contact@fflpartners.com).

## CHANGES TO THIS PRIVACY NOTICE

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We may revise or supplement this Privacy Policy from time to time and such changes will be posted on this page. Last update: November 30, 2023.