

# 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: N o v e m b e r 30, 2023.