

FFL PARTNERS, LLC PRIVACY POLICY

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 (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

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:

- Identifiers, such as your full name, contact details (including e-mail address, postal address and Internet Protocol address), telephone number and other identification (including social security number, passport and drivers’ license or state identification card number);
- Other customer records, such as 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);
- Information FFL receives over the telephone, in voicemails, through written correspondence, via email or other electronic communications, in subscription documents, forms, questionnaires (including without limitation, any anti-money laundering due diligence), websites, data rooms and/or investor reporting portals including, without limitation, information provided through online forms), agreements or in the course of establishing or maintaining a customer relationship;
- Comments, feedback, posts and other content submitted to FFL; and
- Information about investor transactions with FFL, its affiliates or others.

PURPOSES FOR COLLECTING YOUR PII

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:

- Contacting you or your designated representative by phone, email, fax, or mail;
- Providing you or your representative with marketing communications;
- Creating and managing your account with us;
- Sharing information about our Services;
- Facilitating financial transactions related to your account;
- Fulfilling our legal and regulatory obligations;
- The performance of obligations under any applicable agreements;
- The administrative processes (and related communication) carried out between FFL in preparing its services;
- Ongoing communication with you and/or your designated contacts;
- The ongoing administrative, reporting and other processes and communication required to operate the business in accordance with the agreements and other applicable documentation between the parties;
- Any legal or regulatory requirement; or
- Any other purpose that has been notified or agreed to in writing.

LAWFUL BASIS

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 a contract 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

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

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

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 may also use analytics providers, such as Google Analytics to help us evaluate the Site. To opt out of the aggregation and analysis of data collected about you on the Sites by Google Analytics, visit <https://tools.google.com/gaoptout> and download and install the Google Analytics Opt-out Browser Add-on.

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, e-mail address, or credit card information (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

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

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.

Receiving PII from Third Parties

We may receive information about you from other sources and combine that information with the PII we collect directly from you. Additionally, to promote protection of your identity, we also may collect credit or identity information which we use to help prevent and detect fraud.

Sharing PII with Third Parties

We do not and will not sell your PII. If we share your PII with third parties performing services for us, or acting on our behalf, we will not allow them to use your information for other purposes. We require that these third parties otherwise keep this information confidential.

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); or
- 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

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

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 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.

Please note that the rights under the CCPA do not apply to PII collected, processed, sold or disclosed pursuant to Gramm-Leach-Bliley Act (Public Law 106-102) and Fair Credit Reporting Act (12 CFR 1022).

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

- Request that we disclose, free of charge, the categories and specifics of the PII we collect about California residents, the sources from which the PII was collected (and/or, if applicable, sell or otherwise disclose to a third party), and the business purpose for collecting PII.
- Choose to opt-out of the sale of PII. Currently, however, FFL does not sell PII.
- Request that we delete the PII we have collected. Following our verification of the request, we will comply with the request and delete any or all the PII in our possession that we collected from the California resident and/or any or all such PII in the possession of our service providers, unless otherwise restricted by law or regulation.

Non-Discrimination for Exercising Your PII Rights

We follow the requirements of California Civil Code §1798.125, and will not discriminate against any consumer who exercises the rights set forth in this privacy policy.

QUESTIONS OR CONCERNS AND EXERCISING YOUR DATA SUBJECT RIGHTS

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 privacy@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

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

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 privacy@fflpartners.com.

Accessibility Information

For consumers with disabilities who need to access this policy in an alternative format, please contact: privacy@fflpartners.com.

CHANGES TO THIS PRIVACY NOTICE

We may revise or supplement this Privacy Policy from time to time and such changes will be posted on this page. Last update: August 2020.