

Investcorp Privacy Notice – United States

February 2025

Investcorp is committed to protecting your privacy and ensuring the security of your personal data. This Privacy Notice describes how each Investcorp group entity, whether incorporated in the United States (US) or elsewhere, that collects, uses or discloses personal data in the US from time to time (collectively “Investcorp”, “we”, “us”, and “our”), respectively may collect, process, use, disclose and shall protect your personal data, subject to applicable law in the jurisdiction in which the relevant entity is incorporated. This Privacy Notice also demonstrates our commitment to privacy and outlines your rights regarding your personal data.

1. INFORMATION WE MAY COLLECT ABOUT YOU, HOW WE COLLECT IT AND HOW WE USE IT

We intend to give you as much control as reasonably possible over your personal data (information that can be used to identify you, such as your name, email address, telephone numbers, postal address, credit card information, etc.) that we hold about you.

Set out below is a list of the types of personal data we may collect about you.

- **Contact details:** Name, title, postal address, email address, phone number.
- **Personal / demographic information:** Age, date of birth, race, sex, gender, citizenship, marital status and your image (i.e., in photographic and/or videographic form).
- **Government identifiers:** Passport number and/or copy, national identification number and/or document, national insurance or social security number and/or document, driving license and/or other government identification information and/or documents.
- **Educational information:** Education details and academic records (including schooling, grades and/or degrees obtained).
- **Professional information:** Current and/or historic employer and/or employment information (or information about the entity or person you represent) and associated contact details (including job title, employer or associated entity, postal address, email address and phone number), professional licenses and/or memberships.
- **Financial and tax information:** Bank details, wire transfer instructions, source of funds/wealth, account balances, transaction history, investing preferences, investment history, risk tolerance, tax domicile and tax status (and related identifications and/or certifications).
- **Information about other interests:** Directorship / equivalent information, information in relation to other commercial interests (including shareholding or other interests).
- **Business development information:** Details of any interactions you have had with directors, officers, employees and/or other representatives of the Investcorp group, including the time and date of the relevant interaction, with whom at Investcorp the interaction took place, how / in what form the interaction took place and the location of such meeting (e.g., phone call, physical or virtual meeting or email), the primary purpose of the interaction and a summary of the interaction.
- **Online identifying information:** Information on your location, your usage of our website (e.g., user movement including page scrolling, clicks, text entered, etc.) and information on your device.

We may collect personal data about you:

- Directly from you or as a result of interactions we or our affiliates have with you.
- On your behalf by a representative of yours.
- From third parties (including from publicly and freely available databases, from databases provided by third parties for a fee and/or from other third parties such as banks and/or governmental and/or regulatory authorities).
- From analysis of online usage information about you.

Set out below is a list of the purposes for which we may use personal data about you, depending upon the nature of our relationship with you:

- **Client onboarding, account opening, and maintenance:** If you are to become, or are already, a client of ours, we collect information for the purposes of know your client (“KYC”) compliance checks prior to opening your account or effecting your investments to enable us to identify and verify your identity of in accordance with anti-money laundering regulations. We also conduct KYC checks from time to time to ensure the information we hold on you is up-to-date.
- **Providing services to you (including any subscription or redemption):** If you are a client of ours, we collect information to enable us to market and deliver existing and new services to you, process your transactions, provide you with investor reports about your portfolio of investments, issue you with share certificates, etc. In such instances, failure to provide your personal data may mean that we are not able to communicate with you or have a business relationship with you.
- **Marketing purposes:** Regardless of whether you are to become, are, or have ever been, a client of ours, we may contact you with marketing and offers relating to products and services we offer. Where we process your personal information for direct marketing purposes, please be aware that you may object to our processing of your personal data in this way at any time. If you do so, we will log your objection, stop processing your data for direct marketing purposes, and we will not contact you again.
- **Personalize our products and services:** Regardless of whether you are to become, are, or have ever been, a client of ours, we collect online identifying information through the use of cookies (please refer to our [cookie policy](#)) and analytics tools to allow us to (i) show the version of our website that is most relevant to your location, (ii) tailor our website in accordance with your preferences, and (iii) help us identify website usability issues. Offline, we may retain information about the investments and products you are most interested in so that we know what opportunities to inform you of in future.
- **Special events:** Regardless of whether you are to become, are, or have ever been, a client of ours, we may collect information from you when we organize special events to which you subscribe, to enable us to better service your needs during your attendance at such events. We may take photographs at our events and it is possible that such photographs will include your image. We take such photographs for use in promotional materials for future events and we may upload these photographs to our website or microsites that we create for such events and/or as part of press releases or social media posts. Please be aware that you may object to our processing of your personal data in this way at any time. If you do so, we will log your objection, stop processing your data for this purpose, and we will not contact you again.
- **Compliance with legal or regulatory obligations:** Regardless of whether you are to become, are, or have ever been, a client of ours, we collect information in relation to compliance with our legal and regulatory reporting obligations. This may include executed

share purchase agreements, transaction histories, certifications related to FATCA/CRS or other tax reporting requirements, etc.

- **Business development purposes:** Regardless of whether you are to become, are, or have ever been, a client of ours, we may contact you with prospective investment, co-investment, strategic partnership or other proposals for you and/or the organization you are employed by or that you represent.
- **Visitors to our offices:** If you visit our offices we will collect information about you to enable us to verify your identity and record the fact of your visit for security and health and safety purposes (which, for the avoidance of doubt, may include capturing your image on closed-circuit television ("CCTV")).
- **Security:** Investcorp will also process your personal data for the purpose of ensuring office security and for health and safety purposes. Please note that CCTV operates in some of our buildings; where CCTV is not operated by us, the relevant landlord, property manager and/or operator will control the CCTV and will be the controller of any personal data collected via such CCTV.

We do not perform any regular automated-decision-making activities, including profiling activities, where your personal data is processed by automated means, except as described above in relation to the use of cookies in our [cookie policy](#).

2. SHARING YOUR PERSONAL DATA

We may share your personal data as follows:

- **Within Investcorp:** We may share your personal data with other entities in the Investcorp group for the purposes of processing it in accordance with this Privacy Notice.
- **With third-party service providers:** We may share your personal data with our service providers for the purposes of processing it in accordance with this Privacy Notice. This may include, but shall not necessarily be limited to, the provision of your personal data to IT service providers, fund and other administrators, marketing advisors, legal and other professional advisors and other service providers we may deal with from time to time. We may also provide your personal data to any successor, or potential successor, to all or part of our business (or otherwise as necessary in connection with an investment into or transaction related to our business).
- **With governmental and/or regulatory bodies:** We have reporting obligations and other regulatory requirements that may require us to disclose your personal data to governmental and/or regulatory bodies.
- **With other counterparties:** In order to carry out our business activities, we are often required by our counterparties who perform their own KYC procedures to provide certain information to them relating to Investcorp's beneficial owners or the beneficial owners of the investments arranged by Investcorp.

When we share your personal data outside of the Investcorp group, we will ensure they agree to apply equivalent levels of protection for personal data as we do. If this is not possible, for example because we are required by law to disclose information, we will ensure that sharing of that information is lawful.

We will not otherwise use, share, disseminate, publish or disclose your personal data (except as may be required in response to litigation, investigations or other legally required disclosures).

3. PERSONAL DATA STORAGE DURATION

We will store your personal data for only such period as is necessary to fulfil the purposes described above. Once the purpose has been fulfilled, and the storage of your personal data is no longer required for legal or business purposes, we will securely delete it.

When determining the appropriate retention period for a particular item of personal data, we will take into consideration criteria including, without limitation:

- the type of personal data;
- the sensitivity of the relevant type of personal data.
- the volume of each type of personal data;
- the potential risk of harm from unauthorized use or disclosure of the relevant type of personal data;
- the purpose for which the relevant personal data was collected and whether that same purpose could be achieved through other means; and
- applicable legal, regulatory, tax, accounting or other requirements or considerations.

By way of illustration, with respect to KYC information and transaction data, applicable law in the jurisdictions in which we operate varies with respect to the corresponding minimum required retention periods, but the **minimum** required retention period across the jurisdictions in which we operate is, with respect to (i) KYC information, 7 years after our relationship with the relevant consumer ends, and (ii) transaction data, 7 years after the date of the relevant transaction. However, depending upon the relevant jurisdiction, either or both of these periods may be longer and, in some cases, significantly longer.

In all cases, it is possible that we may retain some or all of your personal data for a longer period than originally determined if the purpose for which the personal data was collected is still valid and retention is necessary for legal or business purposes; for example, in the event of a complaint by you or with respect to our relationship with you, if we reasonably believe there is a prospect of litigation with respect to our relationship with you and/or if we are requested or required to do so by a governmental and/or regulatory body.

The above notwithstanding, we regularly assess our need to retain personal data by reference to the purposes for which it was collected. Where it is no longer necessary to retain the data and retention is no longer necessary for legal or business purposes (such as where legal obligations do not mandate further retention) we will securely delete your personal data.

4. OUR WEBSITE AND ELECTRONIC NEWSLETTERS

- **Links to third-party websites.** Our website may contain links to other websites of interest. However, once you have used these links to leave our website, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such websites and such websites are not governed by this Privacy Notice. You should exercise caution and look at the privacy statement applicable to the website in question.

- **Message boards/forums.** Our website may make forums and message boards available to you. Please remember that any information that is disclosed in these areas becomes public information. You should exercise caution when deciding to disclose your personal data.
- **Electronic newsletters.** We may from time to time offer various free electronic newsletters. We do not spam, sell or rent email addresses and we will only send you our newsletter where we are complying with applicable laws regulating direct marketing. You may remove your address from our mailing lists by sending us an email.

5. YOUR RIGHTS

We rely on you to provide accurate, complete and current personal data to us. If you are a resident of California, you may have certain rights under the California Consumer Privacy Act of 2018 as amended by the California Privacy Rights Act of 2020 (collectively, the “CCPA”), as set forth below:

- **Transparency.** We will inform you in this Privacy Notice, along with any other terms provided to you at or before the collection of your personal data, of the categories of personal data we collect about you, the purposes for which such categories of personal data are collected or used, whether such personal data is sold or shared, and the length of time we intend to retain each such category of personal data or, if that is not possible, the criteria we use to determine that period.
- **Access.** You may contact us at any time in order to request access to the personal data we hold about you. Subject to applicable law, we will confirm whether we are processing your personal data, provide details of the categories of personal data concerned and the reasons for our processing. Subject to applicable law, we can also provide you with a copy of your personal data on request.
- **Correction.** If the information we hold appears to be inaccurate or incomplete we will take every reasonable step to not use it, and not allow others to use it, until it is corrected. Subject to applicable law, you can ask us to correct your personal data by contacting us at any time. We will also instruct our service providers and contractors to make the necessary corrections in their respective systems.
- **Deletion.** You may ask to have the personal data on your account deleted or removed. We will also notify our service providers and contractors of the need to delete your personal data from their records. However, we must keep track of certain transaction information, such as past purchases/investments and similar information, for legal compliance purposes, so we may not be able to fully delete your information in certain circumstances.
- **Opt Out of Selling or Sharing.** We do not “sell” your personal data for monetary or other valuable consideration or “share” your personal data with third parties for cross-context behavioral advertising. Accordingly, Investcorp does not have actual knowledge that it “sells” or “shares” the personal data of consumers under 16 years of age.
- **Limit the Use and Disclosure of Sensitive Personal Data.** In certain circumstances, we may receive certain personal data that is considered sensitive under the CCPA, such as race, citizenship, and government identifiers, as described in more detail in Section 1 above. We only process such information in order to provide our services, or as otherwise permitted under applicable law, such that we are not required to provide the right to limit the use or disclosure of sensitive personal data.

- **Automated decision-making.** You may ask us about any automated decision-making, as defined by applicable law, including profiling, used in connection with your personal data, including information about the logic we apply, as well as the significance and consequences of such processing.
- **Non-Discrimination.** We will not discriminate against you for exercising any of your rights under the CCPA. Please note that if you exercise certain rights, we may not be in the position to continue to provide our services to you.

For any of the requests listed above, please email us at compliance@investcorp.com. We will respond within the timing required by applicable law, or will notify you of the need for an extension period, and a reason therefor. Our response to such requests may be limited to information under our direct control.

Before processing your request, we will verify your identity by requiring the successful authentication of your account, or the matching of sufficient information you provide us to the information we maintain about you in our systems. You may designate an authorized agent to submit your request through proof of power of attorney, or by providing written permission and verifying your identity.

You will not have to pay a fee to access or correct your personal data. If your request for access is excessive or unjustified, we may charge a reasonable fee.

Under California's Shine the Light law, you have the right to request, and obtain from us, annually and free of charge, information about the disclosure of your personal data (if any) to third parties for their direct marketing purposes in the previous calendar year. We do not share personal data with third parties for such purposes.

6. SECURITY

- **Security measures.** We limit access to personal data that we collect about you to our employees and third-party agents, who we reasonably believe need to have access to your information to provide you with the information or services you request from us. We have security measures in place to help protect against the loss, misuse and alteration of the information under our control. While we cannot guarantee that loss, misuse or alteration to personal data will not occur, we ensure that our systems adhere to market security standard so as to help safeguard against such occurrences.

Where information is provided to us via our website, in certain areas the information passed between your browser and our system is encrypted with secure sockets layer ("SSL") technology to create a protected connection between you and our Site to ensure confidentiality. However, no method of transmission over the Internet, or method of electronic storage is 100% secure. We will use commercially acceptable means to protect your personal data, but we cannot guarantee its absolute security. If you have any questions about our security, you can email us.

- **Children's privacy protection.** Investcorp does not target, and its websites are not intended for, children under the age of 16. Investcorp will not knowingly collect personal data from children and will delete such data upon discovery. Where Investcorp requires

personal data pertaining to children for the purpose of providing a service, the consent of an adult with parental responsibility for that child will be required.

7. OPTING OUT

If you do not wish to receive certain communications from us, you may opt out by: (1) declining the service offered or (2) informing us that you no longer wish to receive such communications. Your opting out may restrict our ability to provide you with the full extent of our services. Please note that our website does not currently respond to Do-Not-Track (DNT) signals.

8. CONTACT DETAILS

If you are unhappy about how we have handled your personal data you can contact us and we will investigate the matter and report back to you.

If you'd like any more details, or you have comments or questions about our Privacy Notice, contact us by email or write to us: compliance@investcorp.com

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9. CHANGES IN THIS PRIVACY NOTICE

Any changes we make to this Privacy Notice in the future will be posted on this page. We reserve the right to modify this Privacy Notice at any time. If we make material changes to this Privacy Notice, we will notify you by email, or by means of a notice on our website home page.