

# Investor Privacy Notice

## INVESTOR PRIVACY NOTICE

Last Updated: January 1, 2022

Platinum Equity Advisors, LLC, its affiliated funds and subadvisors, (together "**Platinum**", "**us**", "**we**", or "**our**"), respect the privacy of every individual whose personal data we handle, and are committed to the responsible management, use, and protection of personal data. This Privacy Notice describes our practices in connection with the personal data that we may collect from registered investors and representatives of investors ("**Investors**" or "**you**").

Please read the following carefully to understand how and why we process personal data.

### 1. What information is covered by this Privacy Notice?

This Privacy Notice covers personal data processed by Platinum in relation to Investors. "Personal data" means information that reasonably can be used to identify you as an individual person.

Investors may access our Investor Portal. SS&C Technologies, Inc. is a third party whose collection and use of your login information and any other personal data collected in relation to your use of the Investor Portal is subject to a separate privacy policy accessible upon registration and login.

### 2. How do we obtain your personal data?

#### 2.1 **Information we receive from you.** We may obtain personal data from you directly when you:

- Interact with us, ask us to provide you with information, or make use of our services;
- Complete forms and any associated documentation when subscribing for an investment;
- Visit our offices or attend an event we sponsor (including the annual limited partner meeting);
- Are involved in a transaction comprising Platinum and/or the private equity funds or pooled investment vehicles advised by Platinum ("**Private Funds**"), or a potential transaction that Platinum considers;
- Subsequently correspond with us; or
- Request literature relating to a transaction that involves Platinum or one of Platinum's affiliated companies.

**2.2 Information we collect indirectly from other sources.** In addition to personal data you provide to us, we may receive personal data about you from a third-party source, for example, we may collect information from your personnel, agents and professional advisors, advisors which represent you, persons whom you have dealings, government agencies, credit reporting agencies, information or service providers, or from publicly available sources or registers.

### 3. What information do we collect?

We collect and use different types of personal data about you, which will vary in type and detail depending on the circumstances and purpose of processing. This information can include or be related to:

- Identifiers such as your name, date of birth, country(ies) of citizenship, mailing and permanent address, previous addresses, email address, telephone and fax number, account name, social security number, a government issued number (e.g., a social security number, driver's license number or other state identification card number), or similar identifiers;

## Investor Privacy Notice

- Information classified as personal or protected information by state, federal, or other applicable law, including your nationality, place and date of birth, gender, picture, marital status, dependants, and information on criminal history/unlawful conduct;
- Commercial information and other information relating to your financial status and dealings, including investor profile, tax information, national insurance number, bank, investment, and/or brokerage account information (e.g. routing and account numbers), financial account details, credit card number, money transfers including communications on bank transfers, securities holdings, trading activity, assets, income, credit history, debts and expenses, investment strategy, risk tolerance, transaction history, and references provided by third parties, and results of other due diligence;
- Visual information, including your picture and electronic signatures and audio/video recordings of seminars and other meetings that you may attend;
- Information, such as details of your previous employment history and professional activities, information relating to your financial status and dealings, nationality information (including copies of identity documents, such as a passport), references provided by third parties, and results of other due diligence carried out;
- Professional or employment-related information, including your occupation, employer's name, title, source of wealth, education history, and income; or
- Information about your third-party representatives.

### 4. How do we use your personal data?

4.1 **Contract.** We may use your personal data as necessary for us to perform our contractual obligations towards you, or to take steps at your request before entering into a contract, which may include, but are not limited, to:

- Setting up, administering, and managing your investor account(s);
- Processing your investor transaction(s);
- Completing a transfer of your assets from another financial institution to Platinum;
- Alerting you to other products and services that Platinum offers or sponsors, including events, surveys, updates and other relevant information;
- Notifying you of new Platinum funds or other investment offerings;
- Notifying you of the asset management and registered investment advisor services inside Platinum;
- Responding to your comments and questions;
- Providing services to the Private Funds; and
- Assessing your suitability for involvement in a transaction, including by verifying your identity.

4.2 **Legitimate Interests.** We may use your personal data on the basis that it is in our legitimate interest and/or the legitimate interests of a third-party to do so which may include, but are not limited, to:

- Contacting you when necessary and/or appropriate;
- Performing activities relating to client management, financial management and administration;
- Keeping records of your preferences in order to ensure that we do not contact you if you have asked us not to;
- Providing you with and informing you about our investment products and services;

## Investor Privacy Notice

- Providing periodic business updates or notices, or otherwise correspond with you in connection with your investment;
- Maintaining records of investments;
- Administering any transaction that we enter into;
- Seeking and receiving advice from our professional advisors, including accountants, lawyers and other consultants;
- Improving and developing our products and services;
- Arranging and managing company-sponsored events and activities;
- Making audio/video recordings of seminars and other meetings available to existing and potential registered investors, representatives of investors, and others; and
- Allowing you to register for events and communicating with you about events.

4.3 **Applicable Law.** In certain circumstances, we may process your personal data in order to comply with its legal obligations, which may include, but is not limited to:

- Safeguarding our legal rights and interests;
- Responding to law enforcement, government agencies, or judicial or administrative authorities (including court orders and legal investigations);
- Conducting know-your-client and anti-money laundering checks;
- Verifying identity and addresses of investors (and if applicable their beneficial owners);
- Assessing and managing risk;
- Enforcing our policies or contracts;
- Managing licenses, permits and authorizations applicable to Platinum's business operations;
- Protecting against harm to the rights, safety or property of Platinum, and/or that of our partners, you and other users, or the public as legally permissible and necessary; or
- Detecting, preventing, or otherwise addressing fraud, security, or technical issues.

We will not take decisions producing legal effects concerning you, or otherwise significantly affecting you, based solely on automated processing of your personal data, unless we have considered the proposed processing in a particular case and concluded in writing that it meets the applicable requirements under applicable data protection laws.

5. Do we use your personal data for direct marketing?

The provision of your personal data for marketing purposes is voluntary. Marketing may be sent by email, posted on our website or other social media, or via Intralinks, but also sometimes through postal mail or telephone. Please see further information below under "What are your rights?" in relation to your rights to opt out of receiving marketing messages.

6. With whom do we share your personal data?

Your personal data is intended for Platinum but may be shared with third parties in the following circumstances:

6.1 **Within Platinum.** We may share your personal data with our associates, other offices, affiliates, and related parties of our firm to administer our services and products, manage our relationship with you, send

## Investor Privacy Notice

you information about products and services that may be of interest to you, and conduct the other activities described in this Privacy Notice.

**6.2 Business Partners.** We may provide personal information to business partners with whom we jointly offer products or services. In such cases, our business partner's name will appear along with ours.

**6.3 Our service providers. We use other companies, agents or contractors to perform services on our behalf or to assist us with the provision of services. We may share your personal data with the following categories of service provider:**

- Infrastructure and IT service providers (including for email archiving);
- Marketing, advertising, analysis, research and communications agencies;
- Credit reference agencies;
- External auditors and professional advisers (such as accountants, lawyers or other consultants));
- Third party fund administrators for private equity funds or pooled investment vehicles advised by Platinum;
- Certain fund managers, administrator, custodians and investment advisor affiliates of Platinum; and
- Other companies and persons who have an interest or involvement in, or who are considering an interest or involvement in, a Platinum transaction, including co-investors, other providers of finance and investors in Platinum's funds.

We will only provide our service providers with personal data which is necessary for them to perform their services to us, or assist us with the provision of our services, and we require them not to use your information for any other purpose. We will use reasonable commercial efforts to ensure that all our service providers keep your personal data secure.

**6.4 Third parties permitted by law or regulation.** In certain circumstances, we may be required to disclose or share your personal data in order to comply with a legal or regulatory obligation (for example, we may be required to disclose personal data to the police, regulators, tax authorities, government agencies or to judicial or administrative authorities).

We may also disclose your personal data to third parties where disclosure is both legally permissible and necessary to protect or defend our rights, safety or property, and/or that of our partners, you or others, matters of national security, law enforcement, to enforce our contracts or protect your rights or those of the public.

**6.5 Third parties connected with business transfers.** We may disclose or transfer your personal data to third parties in connection with a corporate business transaction, such as a reorganisation, restructuring, merger, acquisition, financing, or sale of company assets, including bankruptcy proceedings, provided that the receiving party agrees to treat your personal data in a manner consistent with this Privacy Notice.

## 7. What are your rights?

To the extent you provide data to a Platinum entity established in the Cayman Islands, or data is otherwise processed by a Platinum entity in the Cayman Islands, the Cayman Islands Data Protection Act (the "**DPA**") will apply to the processing of your personal data by Platinum. In respect of EU data subjects, the EU General Data Protection Regulation will apply to any processing of your personal data by Platinum.

## Investor Privacy Notice

To the extent provided by the law of your jurisdiction, you may request access to the personal data we maintain about you or request that we correct, amend, delete or block the information by contacting us as indicated below. Where provided by law, you may withdraw any consent you previously provided to us or object at any time on legitimate grounds to the processing of your personal data, and we will apply your preferences going forward.

At any time, you can follow the “unsubscribe” link provided in marketing email message received from us to opt out of receiving our email marketing communications. You can make a request to exercise any of these rights in relation to your personal data by contacting us through the address or telephone number provided below.

You also have the right to make a complaint at any time with your national data protection authority or other public authority governing the protection of your personal data. For example, the Cayman Islands Data Protection Ombudsman may be contacted at [info@ombudsman.ky](mailto:info@ombudsman.ky).

### 7.1 EEA Residents and Investors in Platinum's Cayman funds: Your Privacy Rights and International Data Transfer

This section describes how we collect and use your personal data pursuant to the EU General Data Protection Regulation (“GDPR”), the DPA, and other applicable data protection and privacy legislation. Platinum is the Data Controller in relation to your personal data.

In accordance with this Privacy Notice and the provisions of the GDPR and DPA, your personal data may be transferred to and processed by us, our affiliates and our service providers which may be located in countries outside of the Cayman Islands, European Union and / or European Economic Area (“EEA”). In particular, if you are located in the EEA we will transfer the personal data we collect about you to the USA. We will take all steps that are reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Notice as well as applicable data protection laws, including, where relevant, by entering into EU standard contractual clauses (or equivalent measures under the DPA or GDPR) with the recipient outside the EEA (or the Cayman Islands, as applicable).

If you are a resident in the EEA, GDPR generally affords the following rights with respect to your personal data. Similar rights will also apply if the DPA applies as set out above:

- **Access.** You have the right to request a copy of the personal information we are processing about you. For your own privacy and security, at our discretion we may require you to prove your identity before providing the requested information.
- **Correction.** You have the right to have incomplete or inaccurate personal data that we process about you corrected.
- **Deletion.** You have the right to request that we delete personal data that we process about you, except we are not obliged to do so if we need to retain such data in order to comply with a legal or regulatory obligation or to establish, exercise or defend such claims.
- **Restriction.** You have the right to restrict our processing of your personal data where you believe such data to be inaccurate; our processing is unlawful; or that we no longer need to process such data for a particular purpose unless we are not able to delete the data due to a legal or other obligation or because you do not wish for us to delete it.
- **Portability.** You have the right to obtain personal data we hold about you, in a structured, electronic format, and to transmit such data to another data controller, where this is (a) personal data which you have provided to us, and (b) if we are processing that data on the basis of your consent or to perform a contract with you.
- **Objection.** Where the legal justification for our processing of your personal data is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless we have compelling legitimate grounds for the processing which override your interests and rights, or if we need to continue to process the data for the establishment, exercise or defence of a legal claim.

## Investor Privacy Notice

- **Withdrawing Consent.** If you have consented to our processing of your personal data, you have the right to withdraw your consent at any time, free of charge. This includes cases where you wish to opt out from marketing messages that you receive from us.

### 7.2 California Residents: Your California Privacy Rights

Beginning January 1, 2020, the California Consumer Privacy Act of 2018 (“CCPA”) provides California residents with certain additional rights regarding the collection, use and sharing of their personal information as described below. The terms used in this section have the meanings given to them in the CCPA, which may be broader than their common meaning. Please note your right to know and right to delete are subject to certain exceptions under the CCPA.

#### ***Right to Know***

You have the right to request to know the categories and specific pieces of personal information we have collected about you over the past twelve (12) months, as well as information about how we collect, use, disclose, and “sell” personal information. Once we receive and confirm your verifiable consumer request (see *Exercising Your Rights* below), we will disclose to you:

- The categories of personal information we have collected about you;
- The categories of sources from which we the personal information was collected;
- The categories of personal information about you we disclosed for a business purpose or sold (if applicable);
- The business or commercial purpose for collecting or selling (if applicable) that personal information;
- The categories of third parties to whom the personal information was disclosed for a business purpose or sold (if applicable) that personal information; and
- The specific pieces of personal information we have collected about you (also called a data portability request).

#### ***Right to Delete***

You have the right to request deletion of your personal information that we collected from you and retained, though exceptions under the CCPA may allow us to retain and use personal information notwithstanding your deletion request. For example, we may retain personal information (i) as permitted by law, such as for tax or other record keeping purposes. Once we receive and confirm your verifiable consumer request (see *Exercising Your Rights* below), we will delete (and direct our service providers to delete) your personal information from our records, unless an exception applies.

#### ***Exercising Your CCPA Rights***

To exercise your rights described above, please submit a verifiable consumer request to us by either:

- Calling our Privacy Hotline at +1 800.940.4948; or
- Emailing us at [privacy@platinumequity.com](mailto:privacy@platinumequity.com)

In the request, please specify which right you are seeking to exercise and the scope of your request. You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative. We may require specific information from you that allows us to verify your identity and process your request. We cannot respond to

## Investor Privacy Notice

your request or provide you with personal information if we cannot verify your identity or authority to make the request. Making a verifiable consumer request does not require you to register with us. We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

You can designate an authorized agent to submit requests on your behalf. However, we will require written proof of the agent's permission to do so and verify your identity directly.

### ***Do Not Sell My Information***

CCPA provides that California residents may opt out of the sale of their personal information. We have not sold your personal information in the preceding twelve (12) months. We do not have any future plans to sell your personal information, however, we respect and understand that you may still want to ensure that your personal information is not sold. If you would exercise your right, please email us at [privacy@platinumequity.com](mailto:privacy@platinumequity.com) and indicate in your email that you are making a "Do Not Sell My Information" inquiry. Please note that we will only use personal information provided in an opt-out request to review or comply with the request, and to comply with applicable law.

### ***Response Timing and Format***

We will aim to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing.

Any disclosures we provide will only cover the twelve (12) month period preceding receipt of the verifiable consumer request. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

### ***Non-Discrimination***

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not: (i) deny you goods or services, (ii) charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties, (iii) provide you a different level or quality of goods or services, (iv) or suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

### ***What categories of personal data do we disclose for a business purpose?***

During the past twelve (12) months, we have collected the following categories of information from the listed sources, used it for the listed business purposes and shared it with the listed categories of third parties. The categories of information collected include information we collect from our members, event attendees, event sponsors, website users and others that interacts with us either online or offline. This does not mean that all examples of that category of information were in fact collected but reflects our good faith belief to the best of our knowledge that some of that information may have been collected about individuals. We will update this disclosure from time to time as appropriate.

Category of information collected	Source	Business purposes* for use	Categories of third parties receiving information
-----------------------------------	--------	----------------------------	---

## Investor Privacy Notice

<b>Identifiers</b> (name, employer, job title, department, username or similar identifier, postal address, email address and telephone numbers).	Individuals submitting information to us. Information we may receive from third-party marketing and data partners.	Performing services for you. Advertising customization. Auditing relating to transactions. Internal research and development. Security detection, protection and enforcement. Functionality debugging, error and repair. Quality control.	Service providers (such as those listed in the 'Disclosing Personal Information' section above). Affiliated companies. Government regulators. Law enforcement. Strategically aligned businesses.
<b>Sensitive information</b> (passwords, username, or similar security information used for authentication and account access, invoice data and bank, brokerage, and/or investment account details, health data).	Individuals submitting information to us.	Performing services for you. Advertising customization. Auditing relating to transactions. Internal research and development. Security detection, protection and enforcement. Functionality debugging, error and repair. Quality control.	Service providers (such as those listed in Section 5 above). Affiliated companies. Government regulators. Law enforcement. Strategically aligned businesses.
<b>Commercial information</b> (preferences in receiving marketing, record of your participation in an event as an attendee, presenter or a member of the press).	Individuals submitting information to us. Information we automatically collect from website visitors.	Performing services for you. Advertising customization. Auditing relating to transactions. Internal research and development. Security detection, protection and enforcement. Functionality debugging, error and repair. Quality control.	Service providers (such as those listed in Section 5 above). Affiliated companies. Government regulators. Law enforcement. Strategically aligned businesses.
<b>Protected classification information</b> (racial or ethnic origin, religious or philosophical beliefs and sexual orientation).	Individuals submitting information to us.	Performing services for you. Auditing relating to transactions. Internal research and development. Security detection, protection and enforcement.	Service providers (such as those listed in Section 5 above). Affiliated companies. Government regulators. Law enforcement. Strategically aligned businesses.



## Investor Privacy Notice

<b>Professional or employment-related information</b> (employment history, qualifications, academic qualifications and education records, and any other information).	Individuals submitting information to us.	Performing services for you. Auditing relating to transactions. Internal research and development. Security detection, protection and enforcement.	Service providers (such as those listed in Section 5 above). Affiliated companies. Government regulators. Law enforcement. Strategically aligned businesses.
<b>Internet or other electronic network activity</b> (unique device ID, device type, machine ID, the location from which you use or access the website, the kind of browser you use, computer and connection information, browser type, Internet Protocol ("IP") address, domain name, log data, including information associated with your activities on the website such as the date and time you visit the website, the amount of time you spend on the website, information about the way you interact with the website, statistics regarding your page views and traffic to and from the website, the hyperlinks clicked, and other actions you take).	Information we automatically collect from website visitors.	Advertising customization. Auditing relating to transactions. Internal research and development. Security detection, protection and enforcement. Functionality debugging, error and repair. Quality control.	Service providers (such as those listed in Section 5 above). Affiliated companies. Government regulators. Law enforcement. Strategically aligned businesses.
<b>Geolocation</b>	Information we automatically	Advertising customization.	Service providers (such as those listed in Section 5 above).

## Investor Privacy Notice

	collect from website users.	Auditing relating to transactions. Internal research and development. Security detection, protection and enforcement. Functionality debugging, error and repair. Quality control.	Affiliated companies. Government regulators. Law enforcement. Strategically aligned businesses.
<b>Inferences from the above</b> (preferences, characteristics, behaviour, attitudes and abilities, etc.).	Internal analytics	Advertising customization. Auditing relating to transactions. Internal research and development. Security detection, protection and enforcement. Functionality debugging, error and repair. Quality control.	Service providers (such as those listed in Section 5 above). Affiliated companies. Government regulators. Law enforcement. Strategically aligned businesses.

**7.3 California Shine the Light.** Separate from the CCPA, California's Shine the Light law gives California residents the right to request a notice disclosing the categories of personal information we have shared with third parties, for the third parties' direct marketing purposes, during the preceding twelve (12) months. To make a request, please email us at [privacy@platinumequity.com](mailto:privacy@platinumequity.com) and indicate in your email that you are making a "Data Sharing" inquiry.

### 8. How do we protect your personal data?

We have implemented technical and organisational security measures to safeguard the personal data in our custody and control. Such measures include, for example, limiting access to personal data only to employees and authorised service providers who need to know such information for (a) the purposes described in this Privacy Notice and (b) in order to perform their jobs, such as servicing your accounts, providing you with information you request, or notifying you of new products and services. We also maintain certain reasonable physical, electronic, and procedural safeguards to protect the personal data in our possession from loss, misuse, and unauthorized access, disclosure, alteration and destruction, and we review and adjust these safeguards regularly in response to advances in technology.

While we endeavour to protect our systems, sites, operations and information against unauthorised access, use, modification and disclosure, due to the inherent nature of the Internet as an open global communications vehicle and other risk factors, we cannot guarantee that any information, during transmission or while stored on our systems, will be absolutely safe from intrusion by others, such as hackers. Although we will use reasonable efforts to safeguard the confidentiality of your personal data, transmissions made by means of the Internet cannot be made absolutely secure and the website cannot be absolutely protected against unauthorized intrusion. We will have no liability for disclosure of information due to errors in transmission or unauthorized or negligent acts of third parties. In addition, we will release specific information about you to comply with any valid legal process such as a search warrant, subpoena, statute or court order. We will also release specific information in special cases, such as if there is an attempted breach of security or a physical threat to you or others. Please note that if you give out personal data online that information can be collected and used by third parties.

## Investor Privacy Notice

9. How long do we keep your personal data?

We will only retain your personal data for as long as necessary for the purpose for which that data was collected, to perform our contractual obligations, or where longer, such longer period as is required by applicable law or regulation. We will generally retain personal data about you throughout the life cycle of any investment you are involved in. We may retain and use your personal data as necessary to comply with legal obligations, resolve disputes, and enforce our agreements and rights.

10. How can you contact us?

If there are any questions or concerns regarding this Privacy Notice, the ways in which we collect and use your information described above, your choices and rights regarding such use, or if you wish to exercise your rights under applicable law, please contact us at:

**Privacy Hotline:** +1 800.940.4948

**Email:** [Privacy@platinumequity.com](mailto:Privacy@platinumequity.com)

**Mailing Address:** Platinum Equity Advisors, LLC  
Attn: Investor Relations  
360 North Crescent Drive, South Building  
Beverly Hills, CA 90210

11. Changes to this Privacy Notice

We reserve the right to change this Privacy Notice at any time and as permitted by law, and you agree to be bound by such changes. We will notify you of material changes to this Privacy Notice. The “Effective Date” of this Privacy Notice will indicate when the Privacy Notice was most recently updated.