

# California Consumer Privacy Act (“CCPA”) Privacy Notice

## Data protection privacy notice

Siguler Guff & Company, LP and Siguler Guff Advisers, LLC and its related funds and affiliates (together the “Firm”, “we”, “our” or “us”), collect and process personal information about you. We are committed to protecting your personal information and ensuring we respect your privacy. This Privacy Notice is being provided to you with information explaining how we use your personal data in accordance with the California Consumer Privacy Act (“CCPA”). The CCPA notice, effective beginning January 1, 2020, applies to California consumers and is available on both the Firm’s website, <http://www.sigulerguff.com/>, and its affiliate’s website, <http://www.russiapartners.com/>. This policy can also be provided in an alternative format for those consumers with disabilities.

## What is personal information?

Personal information is information that identifies, relates to, describes, is reasonably capable of being associated with or could reasonably be linked, directly or indirectly, with you or your household. It can also include other pieces of information which can be used to identify you, either directly or indirectly, such as a cookie. For purposes of the CCPA, personal information does not include publicly available information, such as information that is lawfully made available from federal, state, or local records, and de-identified or aggregate consumer information. With a limited exception, and as noted in other sections of this privacy policy, certain provisions of the CCPA do not apply to:

- Certain information covered by or collected under industry-specific privacy laws including but not limited to, the Health Insurance Portability and Accountability Act of 1966 (certain health information), the California Confidentiality of Medical Information Act (certain medical information), the Fair Credit Reporting Act (information relating to your credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, and mode of living), the Gramm-Leach-Bliley Act (certain financial information), the California Financial Information Privacy Act (certain financial information), and the Driver's Privacy Protection Act of 1994 (certain driver information).
- Personal information that is collected by us about you when you are acting as our job applicant, employee, owner, director, officer, medical staff member, or contractor to the extent that your personal information is collected and used by us solely within the context of your role or former role as our job applicant, employee, owner, director, officer, medical staff member, or a contractor. However, you will still receive the notice at the time of collection, which outlines the categories of personal information we collect and the purposes for which the categories of personal information is collected.
- Personal information that is collected by us that is your emergency contact information when you are acting as our job applicant, employee, owner, director, officer, medical staff member, or contractor to the extent that we collect and use the personal information solely within the context of having an emergency contact on file. However, you will still receive the notice at the time of collection, which outlines the categories of personal information we collect and the purposes for which the categories of personal information is collected.

Cookies are small text files placed on your computer (or other device where you access the internet) used to collect information on your activities online. They can also be used as part of website functionality, for example, if you use our online services to access information about your investments with us, so you should be careful about accepting, deleting or removing them. Cookies allow us to collect information about the device you are using to access the internet, your IP address and website browser (for example). Cookies can tell us what information you viewed and for how long, the geographic location of your IP address, and your browsing history. We may use this information to analyze the usage of our services in order to improve our services and ensure we are delivering the right services to clients.

If you have concerns about cookies, this web site explains how you can delete and control the cookies that are stored on your computer: <https://www.aboutcookies.org/>

### **Categories of Personal Information: What types of personal information do we collect and use?**

We collect, use, store, and disclose (“Process”) personal information in the course of providing our financial services to you. The personal information about you which we Process includes information acquired such as:

- Employment information (e.g. job title, company name, address, employment history);
- Payment information (e.g. bank account or wiring instructions);
- Education information;
- Contractual/contact information (i.e. our ‘history’ together – services provided or discussed);
- Instructions or requests (for example if you ask for investment advice);
- Financial information (e.g. bank account number, financial position and history, including net worth and credit history);
- Identifiers (e.g. passport, driver’s license, social security number, taxpayer identification number, email address, real name, alias, internet protocol address, or other similar identifiers);
- Public records (or openly accessible data) such as the Electoral Register;
- Social and/or demographic (e.g. profession, birthdate, education, work, nationality, race, income);
- Address, telephone number, and other contact information;
- Historical information (e.g. previous names and addresses);
- Legally protected characteristics;
- Geolocation
- Internet or other electronic network activity (e.g. Cookies)

We have collected the types of personal information outlined above about consumers in the last 12 months for business or commercial purposes. We may use or disclose personal information for one or more of the following business or commercial purposes:

- To fulfill or meet the reason for which the personal information was provided.
- To fulfill our contract with you and our contracts with suppliers.
- To fulfill our regulatory obligations.
- To provide you with information, products, or services that you request from us.
- To perform services such as maintaining or servicing accounts, providing investor services (including processing of subscription documents for investments), processing or fulfilling orders and transactions, verifying customer information (including regulatory background checks) for

anti-money laundering purposes, providing financing, providing advertising or marketing services, or where we have a legitimate interest in processing the information.

- Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity.
- To advance our commercial or economic interest not otherwise identified above.

### **Categories of Third- Parties: Who we share your personal information with**

We may need to provide information to third parties for a variety of reasons; for example, we may need to provide information to assist in the management of your investments with us or the detection or prevention of crime. Please refer to the section titled 'How we will use your personal information' which explains how we use your data. The third parties we share your information with are as follows:

- External legal counsel, and consultants (including regulatory and tax)
- Auditors
- Third party outsourced IT consultant firms
- Companies that assist us with processing transactions and investor accounts such as custodians or administrators
- Third party data sources such as Preqin;
- Third party firms which provide background checks for due diligence and anti-money laundering; and
- Publicly accessible sources, such as databases.

### **Categories of Sources: Where we collect personal information from**

Typically, we will collect information from you when you contact us directly or provide information in order for us to provide our products and services. We collect information from and about you in the following ways:

Through direct interactions when you give us your personal information by filling in forms or during correspondence with us. This includes when you:

- Meet with us in person or talk to us face to face;
- Receive marketing materials from us;
- Complete questionnaires, for example, to give us feedback or provide additional information;
- Complete certain investment documentation (including subscription documents); and
- Enter into a contract with us.

Through using our website when we collect information using cookies or similar technologies which tell us about your equipment, browsing actions and patterns.

Through third parties such as fraud prevention agencies. We may also receive personal information from other companies and organizations such as placement agents, consultants, personal financial advisers, or external legal counsel. The third parties which we may receive personal data from include:

- Third party data sources such as Preqin;

- Third party consultants;
- Third party distributors and placement agents;
- Third party firms such as personal financial advisers;
- Third party firms which provide background checks;
- Third party recruiting or job placement firms;
- External legal counsel; and
- Publicly accessible sources, such as databases.

### **Business or Commercial Purpose: How will we use your personal information?**

We only obtain, use and keep personal information where we need it for a specific purpose. We set out in the list below the ways in which we plan to use your personal data:

- We have a contract with you. For example, we have agreed to provide financial advice or to manage investments for you and have a contractual agreement to do this.
- We have a legal obligation. We need to use your personal information to comply with laws that assist in the prevention of financial crime and to comply with regulatory obligations. For example, this might include confirming your identity and source of wealth in connection with anti-money laundering/know your customer rules, as well as ensuring we provide you with necessary information so you understand the risk of the financial services we can provide.
- We, or a third party, have a legitimate interest in processing the information and your interests and fundamental rights do not override those interests. For example, processing your information to prevent fraud.
- We have a regulatory obligation. We need to use your personal information to comply with certain regulations (e.g. SEC custody rules), and must provide your personal information to our auditor. This may also include ad hoc regulatory exams or reviews that may occur in the normal course of business.
- We, in the course of the day to day management of an investor's account, may need to provide access to an administrator, custodian or other third party in connection with the maintenance, support and review of an account.
- We may want to contact you about products or services we feel may be of interest to you or of benefit. We use your personal information to communicate with you if we have either your consent or a legitimate interest. We believe that as a commercial enterprise we do have a legitimate interest in contacting you about our products or services and we will only do so if we decide that it would be of interest or beneficial for you.

We will only use your personal information for the reason for which we collected it. If we need to use your personal information for another purpose, we will tell you about it, explain the legal basis which allows us to do so, and obtain your explicit consent.

### **Disclosing Your Personal Information for a Business or Commercial Purpose**

We may disclose your personal information to third parties in order to carry out specific business or commercial purposes. In the preceding 12 months, we have disclosed consumer personal information for business or commercial purposes to the following categories of third party service providers:

- External legal counsel;
- Auditors;
- Custodians;
- Administrators;

- Placement agents and distributors;
- Investigative and risk consulting firms (for prevention of financial crime and compliance with regulatory obligations)

In the last 12 months, we have disclosed the following categories of personal information to third party service providers (as described in more detail above) for a business or commercial purpose:

- Identifiers;
- Personal information described in the California Customer Records Act;
- Characteristics of protected classification under California or Federal Law;
- Commercial information;
- Internet or network activity;
- Geolocation data;
- Professional or employment-related information;
- Non-public education information;
- Social and/or demographic information; and
- Inferences drawn from other personal information

### **Selling Your Personal Information for a Business or Commercial Purpose**

We do not and will not sell your personal information to any third-parties for a business or commercial purpose. Similarly, we do not and will not collect or sell the personal information of minors under 16 years of age.

### **Your Rights**

#### **Your rights under the CCPA**

As described in more detail below, the CCPA provides you with certain rights regarding the collection, sale, retention, and disclosure of your personal information.

#### **The Right to Know About Personal Information Collected, Used, or Disclosed**

You have the right to request that we provide you with certain information about the personal information we collect, use, or disclose about you as well as the categories and specific pieces of information that we have collected about you in the 12 months before your submission of a verifiable consumer request. Specifically, you have the right to request the following information:

- The categories of personal information we have collected about you.
- The categories of sources from which we have collected personal information about you.
- Our business or commercial purpose for collecting your personal information.
- Our business or commercial purpose for disclosing the category of personal information about you.
- The specific pieces of personal information we have about you.
- If we disclosed your personal information for a business purpose, you have the right to know:
  - The categories of personal information that we disclosed about you for a business purpose; and
  - The categories of third parties to whom your personal information was disclosed for a business purpose, and which category of personal information was disclosed to that third party.

A household may request to know aggregate household personal information by submitting a verifiable consumer request. Also, if all consumers in a household jointly request access to specific pieces of information for the household, and we can individually verify all the members of the household, then we will comply with the request.

This right does not apply to Business Consumers.

### **Submitting a Verifiable Request to Know About Personal Information Collected, or Disclosed**

To exercise your Right to Know, please submit a verifiable consumer request to us by either:

- **Calling** us at: 212-332-5100
- **Email** us at: [compliance@sigulerguff.com](mailto:compliance@sigulerguff.com)
- **Mail** to: Siguler Guff & Company, LP Attn: Compliance Department 200 Park Avenue, 23<sup>rd</sup> Floor, New York, NY 10166

To submit a verifiable consumer request, you will be asked to:

- Provide information that allows us to have a reasonably high degree of certainty about your identity. This may include matching up to three pieces of personal information provided by you with personal information maintained by us. For example, if we maintain your social security number, we may ask you to provide the last four digits, or if we maintain certain banking instructions we may ask you to provide your account number.

Only you (or an authorized agent) may make a verifiable consumer request for your personal information. If you would like to use an authorized agent, which is an individual or business registered with the Secretary of State that you have authorized to act on your behalf, to submit a request to know, you must provide the authorized agent with written permission to do so and verify your own identity directly with us. We may deny a request from an agent that does not submit proof that they are authorized to act on your behalf.

Please note that we will not respond to a request for your personal information if you have submitted more than two requests in a 12-month period.

### **How We Verify Your Request to Know About Personal Information Collected, or Disclosed**

- **Password-Protected Accounts:** If you have a password-protected account with us, we may verify your identity through our existing authentication practices for your account. We will also require you to re-authenticate yourself before we disclose your personal information. If we suspect fraudulent or malicious activity on or from your account, we will not comply with your request until we perform further verification to determine whether your request is authentic and you are the person about whom we have collected the personal information.
- **Non-Account Holders:** If you do not hold a password-protected account with us, we will verify you as follows:
  - If you submit a request to know the categories of personal information, you will need to provide us with at least two data points, which we will match with at least two data points in our system to verify your identity.

- If you submit a request to know specific pieces of personal information, you will need to provide us with at least three data points, which we will match with at least three data points in our system to verify your identity. You will also be required to submit a signed declaration under penalty of perjury stating that the requestor is the consumer whose personal information is the subject of the request.

We will generally avoid requesting additional information from you to verify you. However, if we cannot verify your identity based on the information we currently maintain, we may request additional information from you, which will only be used to verify your identity. We will delete any new personal information we collect to verify your identity as soon as practical after processing your request unless otherwise required by the CCPA.

Generally, if we are unable to verify your identity, we will inform you of this inability and explain why we were unable to verify your identity.

- If you request specific pieces of personal information but we are unable to verify your identity, we will not disclose any specific pieces of personal information and will inform you that we cannot verify your identity. We will also decline your request if the disclosure would create a substantial, articulable, and unreasonable risk to the security of that personal information, the consumer's account with us, or the security of our systems or networks. We will also not disclose your Social Security number, driver's license number or other government-issued identification number, financial account number, any health insurance or medical identification number, an account password, or security questions and answer. If we decline your request, we will also evaluate your request to determine whether to provide you with the categories of personal information.
- If you request the categories of personal information but we are unable to verify your identity, we will not disclose any categories of personal information and will inform you that we cannot verify your identity. If we decline your request, we will provide you with information on our general business practices regarding the collection and maintenance of personal information.

### **Our Response to Your Request to Know About Personal Information Collected, or Disclosed**

Once we receive your verifiable consumer request, we will confirm our receipt of your request within 10 days and provide you with additional information about how we will process the request. We will promptly take steps to determine whether the request is a verifiable consumer request, and disclose and deliver the requested personal information. If you make a verifiable consumer request to know, our goal is to respond to your request within 45 days of receiving the request, beginning on the day we receive the request. However, in the event that we need more time (up to 90 days) to respond to your request, we will provide you with notice and an explanation of the reasons that we will take more than 45 days to respond. If we are unable to comply with a given request, we will provide you with a response explaining why we have not taken action on your request.

When you request information, we will provide the information requested in a format that is readily useable and that will allow you to transmit the information from one entity to another entity without hindrance. If you request access to the categories and specific pieces of personal information that we have collected about you, we will provide your personal information in a format that is portable, readily usable, and that will allow you to transmit the information to another entity without hindrance (Data Portability request).

If you have an account with us and/or access to our secure investor portal, we will deliver your requested personal information in writing through that account using reasonable data security controls. If you do not have an account with us, you are not required to create an account with us to make a verifiable consumer request, but we will require authentication that is reasonable in light of the nature of the personal information requested, and we will deliver the requested personal information by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt.

We will not charge you 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.

### **The Right to Request Deletion of Personal Information**

---

You have the right to request that we delete any personal information that we have collected from you and maintained about you. Once we receive and confirm your verifiable consumer request, if we determine that we must comply with a deletion request and delete your personal information from our records, we will also direct any service providers we work with to also delete your personal information from their records.

A household may request the deletion of aggregate household personal information by submitting a verifiable consumer request. If all consumers in a household jointly request deletion of household personal information, and we can individually verify all the members of the household, then we will comply with the request.

However, we may deny your deletion request if we or our service providers need your personal information to:

- Complete the transaction for which we collected your personal information, fulfill the terms of a written warranty or product recall conducted in accordance with federal law, provide a good or service you have requested or that is reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.
- Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity.
- Debug to identify and repair errors that impair existing intended functionality.
- Exercise free speech, ensure the right of another consumer to exercise that consumer's right of free speech, or exercise another right provided for by law.
- Comply with the California Electronic Communications Privacy Act pursuant to Cal. Penal Code § 1546 *et seq.*
- Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the business' deletion of the personal information is likely to render impossible or seriously impair the achievement of such research, if the consumer has provided informed consent.
- To enable solely internal uses that reasonably align with your expectations based on your relationship with us.
- Comply with a legal obligation.
- Otherwise use your personal information, internally, in a lawful manner that is compatible with the context in which you provided us with the information.

This right does not apply to Business Consumers.

## Submitting a Verifiable Request to Delete Personal Information

To exercise your Right to Request Deletion, please submit a verifiable consumer request to us by either:

- **Calling** us at: 212-332-5100
- **Emailing** us at: [compliance@sigulerguff.com](mailto:compliance@sigulerguff.com)
- **Mail** to: Siguler Guff & Company, LP Attn: Compliance Department 200 Park Avenue, 23<sup>rd</sup> Floor, New York, NY 10166

To submit a verifiable consumer request, you will be asked to:

- Provide information that allows us to have a reasonably high degree of certainty about your identity. This may include matching up to three pieces of personal information provided by you with personal information maintained by us. For example, if we maintain your social security number, we may ask you to provide the last four digits or if we maintain certain banking instructions we may ask you to provide your account number. We reserve the right to use a third party identification verification service in our verification process, to the extent necessary.

Only you (or an authorized agent) may make a verifiable consumer request for your personal information. If you would like to use an authorized agent, which is an individual or business registered with the Secretary of State that you have authorized to act on your behalf, to submit a request to delete, you must provide the authorized agent with written permission to do so and verify your own identity directly with us. We may deny a request from an agent that does not submit proof that they are authorized to act on your behalf.

## How We Verify Your Request to Delete Personal Information

- **Password-Protected Accounts/Existing Investors:** If you have an account with us, we may verify your identity through our existing authentication practices for your account. We will also require you to re-authenticate yourself before we disclose or delete your personal information. If we suspect fraudulent or malicious activity on or from your account, we will not comply with your request until we perform further verification to determine whether your request is authentic and you are the person about whom we have collected the personal information.
- **Non-Account Holders/Non-Investors:** If you do not hold a password-protected account with us, we will request you to contact the Siguler Guff Compliance Team at [compliance@sigulerguff.com](mailto:compliance@sigulerguff.com) and provide us with at least two data points, which we will match with at least two data points in our system to verify your identity, or we may use a third party identity verification service.

We will generally avoid requesting additional information from you to verify you. However, if we cannot verify your identity based on the information we currently maintain, we may request additional information from you, which will only be used for the purposes of verifying your identity. We will delete any new personal information we collect to verify your identity as soon as practical after processing your request unless otherwise required by the CCPA. We reserve the right to use a third party identification verification service in our verification process, to the extent necessary.

If we are unable to verify your identity, we will inform you that your identity cannot be verified and provide you with specific directions on how you may verify your identity.

## Our Response to Your Request to Delete Personal Information

Once we receive your verifiable consumer request, we will confirm our receipt of your request within 10 days and provide you with additional information about how we will process the request. We will promptly take steps to determine whether the request is a verifiable consumer request, to delete the requested personal information, and to direct any service providers to delete your personal information. If you make a verifiable consumer request to delete, our goal is to respond to your request within 45 days of receiving the request, beginning on the day we receive the request. However, in the event that we need more time (up to 90 days) to respond to your request, we will provide you with notice and an explanation of the reasons that we will take an additional 45 days to respond.

Once we verify your identity, we will comply with your request to delete by:

- Permanently and completely erasing your personal information from our existing systems with the exception of archived or back-up systems until we access or use these systems;
- De-identifying your personal information; or
- Aggregating your personal information.

Once we have deleted your personal information, we will respond to your request by providing you with information on how we deleted your personal information.

There may be instances when we deny your request to delete. If we deny your request to delete, we will inform you that we will not comply with the request, we will describe the reason for the denial (including any statutory and regulatory reasons), and identify any rights. If we are able to delete certain personal information, we will do so.

We will not charge you 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. For example, unless otherwise permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices, fees, or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you with a different level or quality of goods or services.
- Suggest that you will receive a different price, fee or rate for goods or services or a different level or quality of goods or services.

## **Changes to Our California Privacy Statement**

We are required by law to update this California Privacy Statement at least once every 12 months. We will notify you when we make changes to this privacy notice. This California Privacy Notice was last updated on 12/17/2019.

## **Contact Information**

If you have any questions regarding our privacy policies, our California Privacy Statement, the ways in which we collect, use, or disclose your personal information, or how to exercise your rights under the CCPA, please do not hesitate to contact us at:

Siguler Guff & Company, LP

200 Park Avenue, 23<sup>rd</sup> Floor

New York, NY 10166

Marcelo Phillips, Vice President and Chief Compliance Officer

E-mail: [compliance@sigulerguff.com](mailto:compliance@sigulerguff.com)