

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

This California Privacy Notice is for California Residents only and supplements our online [Privacy Notice](#). This notice describes:

- The Personal Information that Siguler Guff & Company, LP, Siguler Guff Advisers, LLC, and its related funds and affiliates (together the “Firm,” “we,” “our,” or “us”) collects in the course of its business and explains how this information is collected, used, sold, disclosed, shared, and retained;
- The rights provided by the California Consumer Privacy Act of 2018 (“CCPA”), as amended by the California Privacy Rights Act (“CPRA”) to California Residents (“consumer” or “you”) regarding their Personal Information; and
- How consumers can exercise those rights.

## Your Personal Information

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### What is Personal Information?

We may collect, use, share, or disclose your 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 (“Personal Information”). It can also include other pieces of information which can be used to identify you, either directly or indirectly, such as a cookie. Personal Information does not include: (1) publicly available information, such as information that is lawfully made available from federal, state, or local records, or (2) de-identified or aggregate consumer information. With a limited exception, and as noted in other sections of this privacy notice, certain provisions of the CCPA do not apply to Personal 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), and the Driver's Privacy Protection Act of 1994.

### What types of Personal Information do we collect and use?

The CCPA requires us to disclose certain information regarding our collection, use, sale, sharing, disclosing, and retention of your Personal Information in the course of providing our financial services to you. In the past twelve (12) months, we have collected the following categories of Personal Information for business or commercial purposes:

- **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, birthdate, income, address, telephone number, and other contact information);
- **Characteristics of a protected class** (e.g., nationality, race, etc.);

- **Commercial records** (e.g., contractual/contact information (i.e., our ‘history’ together – services provided or discussed, payment information (e.g., bank account or wiring instructions);
- **Internet or other electronic network activity** (e.g., cookies);
- **Geolocation data;**
- **Employment information** (e.g., job title, company name, address, employment history);
- **Education information;**
- **Biometric information** (e.g., call recordings)
- **Sensitive Personal Information** (e.g., social security number, driver’s license number, passport number, account number, precise geolocation, racial or ethnic origin, etc.).

### **Where do we collect your Personal Information from?**

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

- You (or your representative)
- Data Analytics Providers
- Marketing Partners
- Our website and mobile applications
- Third-party websites, such as social media websites
- Services Providers
- Credit Reporting Agencies
- Government Agencies
- Third parties
- Publicly accessible databases

We will only use your Personal Information for the reasons 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.

### **What do we do with your Personal Information?**

We may use your Personal Information for one or more of the following business or commercial purposes:

- To fulfill or meet the reasons 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.
- For Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer’s current interaction with the business, provided that the consumer’s personal

information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business.

### **Who may we share your Personal Information with?**

We may need to provide information to third parties for a variety of business or commercial 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. We only obtain, use, and keep Personal Information where we need it for a specific business or commercial purpose. The following is a list of the categories of Personal Information that we may have disclosed for a business purpose to third parties in the preceding 12 months along with the categories of third parties to whom the information may have been disclosed:

- **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, birthdate, income, address, telephone number, and other contact information): We may share this information with external legal counsel, regulatory and tax consultants, auditors, outsourced IT consultants, custodians, administrators, or third-party due diligence providers.
- **Characteristics of a protected class** (e.g., nationality, race, etc.): We may share this information with external legal counsel, regulatory and tax consultants, auditors, outsourced IT consultants, custodians, administrators, or third-party due diligence providers.
- **Commercial records** (e.g., contractual/contact information (i.e., our 'history' together – services provided or discussed, payment information (e.g., bank account or wiring instructions): We may share this information with external legal counsel, regulatory and tax consultants, auditors, outsourced IT consultants, custodians, administrators, or third-party due diligence providers.
- **Internet or other electronic network activity** (e.g., cookies): We may share this information with external legal counsel, regulatory consultants, or outsourced IT consultants.
- **Geolocation data**): We may share this information with outsourced IT consultants or third-party due diligence providers.
- **Employment information** (e.g., job title, company name, address, employment history): We may share this information with external legal counsel, third party due diligence providers or regulatory consultants.
- **Education information**): We may share this information with external legal counsel, third party due diligence providers or regulatory consultants.
- **Sensitive Personal Information** (e.g., social security number, driver's license number, passport number, account number, precise geolocation, racial or ethnic origin, etc.): We may share this information with external legal counsel, regulatory and tax consultants, auditors, outsourced IT consultants, custodians, administrators, or third-party due diligence providers.
- **Biometric Information** (e.g., call recordings) We may share this information with external legal counsel, regulatory consultants, outsourced IT consultants, or third-party due diligence providers.

We may disclose your Personal Information for one or more of the following business or commercial purposes:

- To fulfill or meet the reasons 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.
- For Short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer's current interaction with the business, provided that the consumer's personal information is not disclosed to another third party and is not used to build a profile about the consumer or otherwise alter the consumer's experience outside the current interaction with the business.

We do not and will not sell or share (for cross-contextual behavioral advertising) your Personal Information to any third party, nor have we done so in the preceding 12 months. Similarly, we do not and will not collect, sell, or share (for cross-contextual behavioral advertising) the Personal Information of minors under 16 years of age.

### **How may we use your sensitive Personal Information?**

We only collect or use sensitive Personal Information for the following business or commercial purposes:

- To perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services.
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, and or confidentiality of stored or transmitted Personal Information.
- To resist malicious, deceptive, fraudulent, or illegal actions directed at the business and to prosecute those responsible for those actions.
- To ensure the physical safety of natural persons.
- For short-term, transient use, including, but not limited to, non-personalized advertising shown as part of a consumer's current interaction with the business.
- To perform services on behalf of the business.
- To verify or maintain the quality or safety of a product, service, or device that is owned, manufactured, manufactured for, or controlled by the business, and to improve, upgrade, or enhance the service or device that is owned, manufactured by, manufactured for, or controlled by the business.
- To collect or process sensitive Personal Information where such collection or processing is not for the purpose of inferring characteristics about a consumer.

### **How Long We Retain Your Personal Information**

We store Personal Information for as long as we believe is reasonably necessary or appropriate to fulfil our business or commercial purposes or to comply with applicable law, audit requirements, regulatory requests, or orders from competent courts.

## Your Rights under the CCPA

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The CCPA provides you with certain rights regarding the collection, use, and disclosure of your Personal Information. As described in more detail below, the CCPA provides you with the following rights:

1. The **Right to Know/Access** what Personal Information we have collected about you. Before or when we collect your Personal Information, you have the right to know:
  - The categories of Personal Information (including Sensitive Personal Information) we collect, the business or commercial purpose for which we collect and use the Personal Information, and whether we sell or share that information; and
  - How long we intend to keep each category of Personal Information, including Sensitive Personal Information.

You also have the right to request that we provide you with certain information about the Personal Information we collect, use, share, disclose, or sell, as well as the categories and specific pieces of information that we have collected about you. Specifically, you have the right to request the following information:

- The categories of Personal Information we collect.
  - The categories of sources from which the Personal Information is collected.
  - The business or commercial purpose for collecting, selling, or sharing Personal Information.
  - The categories of third parties to whom we disclose Personal Information.
  - If we sold or shared your Personal Information, which we do not, the categories of Personal Information that we collected and shared about you and, for each category identified the categories of third parties to which we, shared that particular category of Personal Information.
  - If we disclosed your Personal Information for a business purpose, the categories of Personal Information that we disclosed about you and the categories of third parties to which we disclosed that Personal Information for a business purpose.
  - The specific pieces of Personal Information the business has collected about you.
2. The **Right to Delete** the Personal Information we collected and maintained about you once we verify your request. However, there may be reasons we need to keep your Personal Information and we will inform you if that is the case.
  3. The **Right to Correct** inaccurate Personal Information we have collected from you and maintained about you. Once we verify your request, including the inaccurate information, we will update your inaccurate Personal Information from our records and our service provider's records.
  4. The **Right to Limit the Use and Disclosure of Sensitive Personal Information** if we use the information for reasons that are not aligned with why we obtained such information. However, we can use this information as permitted by law, to follow the law, and to give you the best service.
  5. The right to **Non-Discrimination or Non-Retaliation**, which means we cannot discriminate or retaliate against you if you exercise your rights under the CCPA.

You also have the **Right to Opt-Out** of the sale or sharing (for targeted advertising) your Personal Information. However, we do not sell or share your Personal Information.

## **Submitting a Verifiable Request to Know, Correct, or Delete Personal Information**

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To exercise your Right to Know, Correct, or Delete your Personal Information, please submit a request to us by:

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

To submit a request, we must verify your identity:

- **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 need to 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, we will ask you for at least two pieces of information, 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, we will ask you for at least three pieces of information, 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. Please note there is certain information we are not permitted to provide you, such as certain Sensitive Personal Information.

We will generally avoid requesting additional information from you to verify you unless necessary. This information will only be used to verify your identity and will delete any new Personal Information we collect to verify your identity as soon as possible.

If we are unable to verify your identity, we will let you know and explain why we were unable to verify your identity.

If you would like to use an authorized agent, which is an individual or business registered with the Secretary of State, to submit a verifiable request, you must provide the authorized agent with written permission to do so and verify your own identity directly with us or directly confirm that you provided the authorized agent with permission to submit the request. 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.

## **Responding to a Request to Know, Correct, or Delete Personal Information**

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Once we receive your request, we will send you a confirmation email within 10 days and provide you with next steps for processing your request, including verifying your identity. We will respond to your request within 45 days unless we need more time. We will provide you with additional information if that is the case.

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

## **Changes to Our California Privacy Notice**

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We are required by law to update this California Privacy Notice 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 January 1, 2023.

## **Contact Information**

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If you have any questions regarding our privacy policies, our California Privacy Notice, 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, Principal, and Chief Compliance Officer  
**E-mail:** [compliance@sigulerguff.com](mailto:compliance@sigulerguff.com)  
**Phone:** 212-332-5100