

# **Personal Information Protection Law (“PIPL”) Privacy Notice**

## **Who we are**

Siguler Guff & Company, LP (“Siguler Guff”) and Siguler Guff Shanghai, LLC (“SG China”) and its affiliates (together with Siguler Guff and SG China, the “Firm”, “we” , “our” , or “us”) are personal information processing entities (“PIPE”), pursuant to the People's Republic of China PIPL. SG China is an affiliate of Siguler Guff and in certain circumstances acts together with Siguler Guff as joint processors.

The PIPL privacy notice explains how we collect, use, store, and disclose (“Process”) your personal data and how you may exercise your rights, as provided for by the PIPL.

This privacy notice is available on the Firm’s website, <http://www.sigulerguff.com/>.

## **What is personal data?**

Personal data is defined by the PIPL as information regarding an identified or identifiable natural person, which includes any 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. This includes various types of electronic or otherwise recorded information relating to an identified or identifiable natural person. It can also include other pieces of information which can be used to identify you, either directly or indirectly, such as cookies.

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

We, or third parties acting on our behalf, may Process personal data about you from a number of sources. We may collect personal data that you provide, such as when you submit a job application to us, or sign up for an event organized by us, or subscribe to receive marketing materials from us. We may also collect personal data from third party sources, such as publicly available information that is lawfully made available from federal, state, or local records.

We may also automatically Process personal data as you interact with us, through cookies and/or other similar technologies, including information such as the IP address from which you visited our website. 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 website explains how you can delete and control the cookies that are stored on your computer: <https://www.aboutcookies.org/>

We may Process your 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, CPF taxpayer identification number, email address, real name, alias, internet protocol address, or other similar identifiers);
- Public records (or openly accessible data);
- 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, 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 firms which provide background checks for due diligence; 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;
- 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 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. We may disclose 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;
- Characteristics of protected classification under 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.

### **Sending your information outside of China**

We operate globally and may process your personal data in jurisdictions other than the one you are based. In any event, when transferring personal data across borders, we take steps to put in place safeguards to protect your personal data as required by the PIPL. These safeguards may include:

- Transferring Personal Data to recipients located in countries deemed to provide an adequate level of protection for personal data, as provided for by the PIPL and further regulation issued by the data protection authority; and
- Entering into agreements containing contractual safeguards, pursuant to the PIPL and further regulation issued by the data protection authority.

You can obtain further information on the specific mechanism used by us when transferring your personal information outside of China by contacting the Designated Representative.

### **Storing your information**

The period for which we will retain personal information will vary depending on the purposes that it was collected for, as well as the requirements of any applicable law or regulation. When we decide how long we will retain your personal information, we will take into account the amount, nature, sensitivity of your information and how we want to use it as well as the potential risk of harm being caused from unauthorised use or disclosure. We review our retention periods for personal information on a regular basis and will ensure all records are safely destroyed if we no longer need to retain them or you have contacted us to request so.

### **Security**

We have put in place appropriate security measures to protect your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have a procedure to deal with any suspected personal data breach and will notify you, and other regulators, where we are legally required to do so.

### **Your Rights Under the PIPL**

You are provided with a number of different rights under the PIPL in relation to your personal information. These allow you:

- To access your information;
- To request we correct your information;
- To request that we erase your information;
- To object to the processing of your information whenever it is not compliant with the PIPL;
- To request a transfer of your information;
- To request not to be subject to automated decision-making;
- To withdraw your consent; and
- To lodge a complaint with the regulator.

If you wish to exercise any of these rights, please contact our Designated Representative and compliance team. Please note that you will not have to pay a fee to access your personal information or to exercise any of the other rights. We may need to seek further information from you to confirm your identity before we release any personal information. You have the right to make a complaint at any time to the Cyberspace Administration of China (“CAC”), the People’s Republic of China authority for data protection issues. The CAC’s website can be accessed on the link: <http://www.cac.gov.cn/>. We would, however, appreciate the chance to deal with your concerns before you approach the CAC, so please contact us in the first instance.

## **Non-Discrimination**

We will not discriminate against you for exercising any of your PIPL rights. For example, unless otherwise permitted by the PIPL, 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.

## **Contact Information**

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

### **Siguler Guff Shanghai, LLC - Designated Representative: Vivian Zhu**

2205 CITIC Square  
1168 Nanjing Road (W)  
Shanghai, China 200041  
Tel: +86 (21) 5292-5256  
Fax: +86 (21) 5292-5575  
[vzhu@sigulerguff.cn](mailto:vzhu@sigulerguff.cn)

### **Alternative Contact**

Marcelo Phillips, Vice President and Chief Compliance Officer  
E-mail: [mphillips@sigulerguff.com](mailto:mphillips@sigulerguff.com)