



**Investor Privacy Notice**

## APPENDIX J: RIVERSIDE INVESTOR PRIVACY NOTICE

### Our Commitment to Your Privacy

This privacy notice describes the privacy practices of Riverside Partners L.L.C., d/b/a, The Riverside Company and its affiliated advisors and private funds (“*Riverside*”). Respecting privacy is fundamental to our relationship with our potential and current investors and our former investors, to which this notice also applies. Riverside is also committed to maintaining the confidentiality, integrity and security of your personal information (“*Personal Information*”). Accordingly, our internal policies are designed to respect your privacy and protect your Personal Information while allowing us to serve you as an investor. We are providing you this notice to help you better understand the following:

- Personal Information Riverside Collects
- How Riverside Uses Your Personal Information and How Riverside Justifies this Use
- Protecting Your Personal Information
- Sharing Your Personal Information with Third Parties
- How Long Your Personal Information is Retained and Destruction and Disposal
- Cross-Border Data Transfers
- What Your Rights Are and How to Submit Privacy Inquiries or Complaints
- Obtaining and Handling Your Consent
- The Responsible Riverside Legal Entity for Compliance
- Effective Date

### Personal Information Riverside Collects

In order to inform you of our investment programs and to accurately and efficiently conduct the investment program of each of our private funds, we must collect and maintain certain Personal Information about you and the other limited partners and members in our funds. This Personal Information includes:

1. **Identification information** (e.g. name, national identifier (to the extent allowed by applicable law), date of birth, mother’s maiden name, passport-related information, home address, etc.).
2. **Contact information** (e.g. your personal email addresses, phone number and mobile number, etc.).
3. **Family information** (e.g. marital status, beneficiary, etc.).
4. **Personal interests** (e.g. hobbies, interests, etc.).
5. **Financial information** (e.g. bank account number, transactions, information on capital call and distribution notices, assets held, etc.).
6. **Occupation-related information** (e.g. current and past occupation or employment, professional skills and experience, etc.).
7. **Investor profile-related information** (e.g. risk preference, knowledge about investment products, etc.).
8. **Automatically collected information** (e.g. information collected via cookies and web beacons including IP address, browser name, operating system details, domain name, date and time of visit and page(s) viewed, etc.).

9. **Communications and messages** (e.g. the content of your communications with and message to Riverside, etc.)

We obtain such Personal Information from the following sources:

- Information we receive from you: (i) in conversations directly, over the telephone and in voicemails; (ii) through written correspondence and e-mail; (iii) on subscription agreements, investor questionnaires, applications or other forms.
- Information submitted online through the Riverside Investors Portal, available at [https://dynamo.netagesolutions.com/Portal/Login/Riverside\\_US/Investors/](https://dynamo.netagesolutions.com/Portal/Login/Riverside_US/Investors/).
- Information about your transactions with us, including marketing information (e.g., participation in certain investment programs).
- Publicly available information that Riverside receives from third-party sources (e.g., credit bureaus, government databases).
- Information we collect if you choose to use our website. A description of the information collected on the website is available at <https://www.riversidecompany.com/terms-of-use/>.

While collecting Personal Information from you, Riverside will inform you whether the requested information is obligatory or voluntary, when practicable. If you chose not to provide certain information, your use of certain resources may be impacted. For instance, if you chose not to provide a valid email address, you will not be able to make use of the Riverside Investor Portal.

**How Riverside Uses the Personal Information and How Riverside Justifies this Use**

Riverside may use your Personal Information for the following purposes:

<b>Purpose</b>	<b>Legal basis under EU data protection law</b>	<b>Personal Information categories required</b>
Riverside uses your Personal Information to provide information or services requested (e.g. administration, executing transactions on your behalf or providing account statements based on your choice).	Contractual obligation	1, 2, 3, 4, 5, 6, 7, 8 and 9
Riverside uses your Personal Information for investor relationship management purposes.	Legitimate interest to manage investor contacts and data.	1, 2, 3, 4, 5, 6, 7, 8 and 9
Riverside uses your Personal Information to provide you access to the Riverside Investors Portal.	Contractual obligation	1, 2 and 8
Riverside uses your Personal Information to respond to communications or requests initiated by you.	Legitimate interest to be able to engage in normal business communication	1, 2 and 9
Riverside sends you informational materials (e.g., newsletters, press releases, etc.) based on your subscriptions.	Consent	1, 2, 8 and 9

Riverside uses your Personal Information for statistical purposes and internal reporting.	Legitimate interest to obtain business insights and engage in management reporting.	1, 2, 3, 4, 5, 6, 7, 8 and 9
Riverside uses your Personal Information to send notifications and reports to competent supervisory authorities.	Legal obligation	1, 2, 3, 4, 5, 6, and 7
Riverside reserves the right at all times to monitor, review, retain, and/or disclose any Personal Information as necessary to satisfy any applicable law, regulation, legal process or governmental request or to cooperate with law enforcement and other authorities in investigating a claim of illegal activity as required by law.	Legal obligation	1, 2, 3, 4, 5, 6, 7, 8 and 9
Riverside uses your Personal Information to ensure the security of our IT systems, processes, premises, data, assets, employees, investors, partners and suppliers.	Legitimate interest to conduct Riverside’s business in a safe and secure manner.	1, 2, 8 and 9
Riverside uses your Personal Information to prepare for and engage in legal proceedings, including judicial proceedings, collect and prepare evidence and mount a defense	Legitimate interest to be able to defend legitimate interests before a court or other judicial or dispute resolution body	1, 2, 3, 4, 5, 6, 7, 8 and 9
Riverside uses your Personal Information to engage in corporate (re-)structuring, mergers, acquisitions and similar corporate transactions	Legitimate interest to engage in normal corporate structuring practices	1, 2, 3, 4, 5, 6, 7, 8 and 9

You understand that most of the Personal Information referred to in this Notice is necessary in order to provide you with Riverside’s services or are required for Riverside’s legitimate business purposes and not providing such Personal Information, unless we ask for your consent, may make performance of such services impossible.

**Protecting Your Personal Information**

Riverside uses technical, administrative and physical measures to protect your Personal Information against accidental or intentional destruction, loss, alteration, unauthorized disclosure or access and against other unlawful forms of collection and processing. Riverside follows industry standards and practices to help protect the confidentiality and integrity of your Personal Information. When your Personal Information is shared, Riverside will take a proactive approach so that the Personal Information is safeguarded.

**Sharing Your Personal Information with Third Parties**

Riverside does not share your Personal Information with third parties for their own direct marketing purposes without providing you an opportunity to object or without your consent where

required by law.

We only disclose your Personal Information to our affiliates and other third parties as allowed by applicable law and regulation. In the normal course of serving you, Personal Information we collect may be shared with third parties such as our IT service providers, accountants, attorneys, custodians and financial institutions that provide services for Riverside in order to meet our obligations toward you or to deliver the requested services. Specifically, we may disclose to these third parties the Personal Information we collect for conducting our business with you. We require any third party that receives this information from Riverside to use it only for the services required and as allowed by applicable law or regulation. We do not permit third parties to share or use this Personal Information for any other purpose. We also will disclose your Personal Information to governmental, judicial or other competent authorities and/or bodies as required by applicable law or regulation and to comply with valid requests.

Riverside reserves the right to share your Personal Information in the event it sells licenses or transfers all or a portion of its business or assets. Should such a sale, lease or transfer occur, Riverside will make reasonable efforts to direct the transferee to use Personal Information about you in a manner that is consistent with this notice and applicable law.

### **How Long Your Personal Information is Retained and Destruction and Disposal**

Riverside endeavors to only keep your Personal Information for as long as it is legally or contractually required to do so or it has legitimate interests to do so. More information about specific retention periods related to investor Personal Information can be found in the Riverside data retention schedule.

Riverside will make reasonable efforts to ensure that all Personal Information is properly destroyed before being disposed pursuant to Riverside's policies and procedures.

### **Cross-Border Data Transfers**

Riverside may transfer your Personal Information across country borders in accordance with applicable local laws and regulations.

When Riverside transfers your Personal Information from the EU to countries outside the EU where the local laws do not provide the same level of protection to your Personal Information as the country of origin, Riverside has implemented data transfer agreements based on the EU Standard Contractual Clauses to cover such international data transfers. You can receive a copy of these agreements via [privacyinquiry@riversidecompany.com](mailto:privacyinquiry@riversidecompany.com).

### **Obtaining and Handling Your Consent**

Riverside will seek to obtain your consent where required by applicable law. Where the collection and processing of your Personal Information solely relies on your consent, you have the ability to revoke your consent for Riverside to collect and process your Personal Information at any time by contacting Riverside using the contact information below subject to applicable legal

obligations.

### **What Your Rights Are and How to Submit Privacy Inquiries and Complaints**

You may use the contact information below to request access to, amendment or deletion of the Personal Information that Riverside has about you or to submit a general privacy related inquiry or complaint. You have the right to object to your Personal Information being processed and you have a right to data portability. You also have the right to lodge a complaint to the local data protection supervisory authority.

Riverside will respond to such requests in accordance with applicable laws.

Please issue such requests via writing by providing your name, company name, and contact information to us at:

### **The Responsible Riverside Legal Entity for Compliance**

The Riverside Company  
Attention: Privacy Office  
630 5<sup>th</sup> Avenue, Suite 400  
New York, NY 10111

#### **Email Address:**

[privacyinquiry@riversidecompany.com](mailto:privacyinquiry@riversidecompany.com)

#### **Phone Number:**

+1 (212) 484-2687

Riverside will respond to such requests in accordance with applicable laws.

#### **Effective Date**

This privacy notice is effective from November 1, 2020. We reserve the right to change our privacy policies and this Privacy Notice at any time. The examples contained within this notice are illustrations only and are not intended to be exclusive. You may have additional rights under other foreign or domestic laws that may apply to you.