

# Privacy Policy

*Effective March 1, 2024*

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By using or accessing our Site in any manner, you acknowledge that you accept the practices and policies outlined below, and you hereby consent that we will collect, use and disclose your information as described in this Privacy Policy.

Remember that your use of our Site is at all times subject to our Terms of Use, which incorporates this Privacy Policy. Any terms we that use in this Privacy Policy without defining them shall have the definitions given to them in the Terms of Use.

## **WHAT THIS PRIVACY POLICY COVERS**

This Privacy Policy covers important information and disclosures relating to how we treat Personal Data that we gather when you access or use our Site, but does not cover the practices of companies we don’t own or control or people we don’t manage, nor to the privacy practices of any entity with whom we have an investment relationship, even if you are able to access such entity’s website or service through a link on the Site. It also does not apply to information obtained or disclosed in offline correspondence or in connection with an investment in one of our affiliated investment funds. Please note that you may have additional rights to control the use and disclosure of your Personal Data. Residents of California or the European Union and United Kingdom should refer to the relevant subsections below. If you have a disability, you may access this Privacy Policy in an alternative format by contacting [investorrelations@polarispartners.com](mailto:investorrelations@polarispartners.com).

Use of the term “Personal Data” herein means any information that identifies or relates to a particular individual and also includes information referred to as “personally identifiable information” or “personal information” under applicable data privacy laws, rules or regulations.

## **CATEGORIES OF PERSONAL DATA WE COLLECT**

Below are the categories of Personal Data that we collect, may collect and/or have collected over the past 12 months:

### Device/IP Data

- *Examples of Personal Data We Collect:* IP address (but not including “precise geolocation”), device ID, domain server, type of device/operating system/browser used to access the Services
- *Categories of Third Parties With Whom We Disclose this Personal Data:* service providers, business partners, parties you authorize, access or authenticate

### Web Analytics

- *Examples of Personal Data We Collect:* web page interactions, referring webpage/source through which you accessed the services, non-identifiable request IDs, statistics associated with the interaction between device or browser and the services
- *Categories of Third Parties With Whom We Disclose this Personal Data:* service providers, business partners, parties you authorize, access or authenticate

### Other Identifying Information that You Voluntarily Choose to Provide

- *Examples of Personal Data We Collect:* identifying information in emails or letters you send us
- *Categories of Third Parties With Whom We Disclose this Personal Data:* service providers, business partners, parties you authorize, access or authenticate

### **Categories of Sources of Personal Data**

We collect Personal Data about you from the following categories of sources:

#### You

- *When you provide such information directly to us.*
  - When you use our Site.
  - When you voluntarily provide information in free-form text boxes through the Site or through responses to surveys or questionnaires.
  - When you send us an email or otherwise contact us.
- *When you use the Site and such information is collected automatically.*
  - Through Cookies (defined in the “Tracking Tools and Opt-Out” section below).

#### Third Parties

- *Vendors*
  - We may use analytics providers to analyze how you interact and engage with the Site, or third parties may help us provide you with customer support.

### **Our Commercial or Business Purposes for Collecting or Disclosing Personal Data**

#### Providing, Customizing and Improving the Site

- Providing you with the products, services or information you request.
- Meeting or fulfilling the reason you provided the information to us.
- Providing support and assistance for the Site.
- Improving the Site, including testing, research, internal analytics and product development.
- Personalizing the Site, website content and communications based on your preferences.
- Doing fraud protection, security and debugging.
- Carrying out other business purposes stated when collecting your Personal Data or as otherwise set forth in applicable data privacy laws, such as the California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (the “CCPA”).

#### Corresponding with You

- Responding to correspondence that we receive from you, contacting you when necessary or requested, and sending you information about us or the Site.
- Sending emails and other communications according to your preferences or that display content that we think will interest you.

#### Meeting Legal Requirements and Enforcing Legal Terms

- Fulfilling our legal obligations under applicable law, regulation, court order or other legal process, such as preventing, detecting and investigating security incidents and potentially illegal or prohibited activities.
- Protecting the rights, property or safety of you, us or another party.
- Enforcing any agreements with you.
- Responding to claims that any posting or other content violates third-party rights.
- Resolving disputes.

We will not collect additional categories of Personal Data or use the Personal Data we collected for materially different, unrelated or incompatible purposes without providing you notice.

### **HOW WE DISCLOSE YOUR PERSONAL DATA**

We disclose your Personal Data to the categories of service providers and other parties listed in this section. Depending on state laws that may be applicable to you, some of these disclosures may

constitute a “sale” of your Personal Data. For more information, please refer to the state-specific sections below.

Service Providers. These parties help us provide our services or perform business functions on our behalf. They include hosting, technology and communication providers; security and fraud prevention consultants; and analytics providers.

Business Partners. These parties partner with us in offering various services. They include businesses that you have a relationship with, including our investment fund affiliates.

Parties You Authorize, Access or Authenticate. They include third parties you access through the services; and other users.

### **Legal Obligations**

We may disclose any Personal Data that we collect with third parties in conjunction with any of the activities set forth under “Meeting Legal Requirements and Enforcing Legal Terms” in the “Our Commercial or Business Purposes for Collecting Personal Data” section above.

### **Business Transfers**

All of your Personal Data that we collect may be transferred to a third party if we undergo a merger, acquisition, bankruptcy or other transaction in which that third party assumes control of our business (in whole or in part). Should one of these events occur, we will make reasonable efforts to notify you before your information becomes subject to different privacy and security policies and practices.

### **Data that is Not Personal Data**

We may create aggregated, de-identified or anonymized data from the Personal Data we collect, including by removing information that makes the data personally identifiable to a particular user. We may use such aggregated, de-identified or anonymized data and disclose it to third parties for our lawful business purposes, including to analyze, build and improve the Services and promote our business, provided that we will not disclose such data in a manner that could identify you.

### **TRACKING TOOLS AND OPT OUT**

The Site use cookies and similar technologies such as pixel tags, web beacons, clear GIFs and JavaScript (collectively, “Cookies”) to enable our servers to recognize your web browser and tell us how and when you visit and use our Site, to analyze trends, learn about our user base and operate and improve our Site. Cookies are small pieces of data – usually text files – placed on your computer, tablet, phone or similar device when you use that device to access our Site. We may also supplement the information we collect from you with information received from third parties, including third parties that have placed their own Cookies on your device(s). Please note that because of our use of Cookies, the Site does not support “Do Not Track” requests sent from a browser at this time.

We currently use and/or may use in the future the following types of Cookies:

Essential Cookies. Essential Cookies are required for providing you with features or services that you have requested. For example, certain Cookies enable you to log into secure areas of our Site. Disabling these Cookies may make certain features and services unavailable.

Functional Cookies. Functional Cookies are used to record your choices and settings regarding our Site, maintain your preferences over time and recognize you when you return to our Site. These Cookies help us to personalize our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

Performance/Analytical Cookies. Performance/Analytical Cookies allow us to understand how visitors use our Site such as by collecting information about the number of visitors to the Site, what pages visitors view on our Site and how long visitors are viewing pages on the Site. Performance/Analytical Cookies

also help us measure the performance of our advertising campaigns in order to help us improve our campaigns and the Site's content for those who engage with our advertising.

You can decide whether or not to accept Cookies through your internet browser's settings. Most browsers have an option for turning off the Cookie feature, which will prevent your browser from accepting new Cookies, as well as (depending on the sophistication of your browser software) allow you to decide on acceptance of each new Cookie in a variety of ways. You can also delete all Cookies that are already on your device. If you do this, however, you may have to manually adjust some preferences every time you visit our website and some of the Site and functionalities may not work.

To find out more information about Cookies, including information about how to manage and delete Cookies, please visit <https://ico.org.uk/for-the-public/online/cookies/> or <http://www.allaboutcookies.org/>.

## **DATA SECURITY**

We seek to protect your Personal Data from unauthorized access, use and disclosure using appropriate physical, technical, and administrative security measures and storage and processing practices based on the type of Personal Data.

Although we work to protect the security of your account and other data that we hold in our records, please be aware that no method of transmitting data or storing data over the Internet is completely secure. We cannot guarantee the complete security of any data you disclose to us, and except as expressly required by law, we are not responsible for the theft, destruction, loss or inadvertent disclosure of your information or content.

## **DATA RETENTION**

We retain Personal Data about you for as long as necessary to provide our Site and/or services to you, comply with our legal obligations, resolve disputes, or as otherwise permitted or required by applicable law, rule or regulation. When establishing a retention period for specific categories of data, we consider who we collected the data from, our need for the Personal Data, why we collected the Personal Data, and the sensitivity of the Personal Data.

For example, we retain your device/IP data for as long as we need it to ensure that our systems are working appropriately, effectively, and efficiently. We may further retain information in an anonymous or aggregated form where that information would not identify you personally.

## **PERSONAL DATA OF MINORS**

We do not knowingly collect or solicit Personal Data about children under 16 years of age, except with parental consent. If we learn that we have collected personal information from an individual under the 16 years of age without parental consent, we will delete such information as quickly as possible. If you believe that a child under 16 years of age may have provided Personal Data to us, please contact us at [investorrelations@polarispartners.com](mailto:investorrelations@polarispartners.com).

## **PRIVACY RIGHTS OF CALIFORNIA RESIDENTS**

If you are a resident of California, you have the rights set forth in this section. If there are any conflicts between this section and any other provision of this Privacy Policy, the portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following rights apply to you, please contact us at [investorrelations@polarispartners.com](mailto:investorrelations@polarispartners.com).

### **Access**

You have the right to request certain information about our collection and use of your Personal Data over the past 12 months, including the:

- Categories of Personal Data that we have collected about you.
- Specific pieces of Personal Data that we have collected about you.
- Categories of sources from which that Personal Data was collected.
- Business or commercial purpose for collecting your Personal Data.

- Categories of third parties with whom we have disclosed your Personal Data.
- Categories of Personal Data disclosed to third parties for a business purpose over the past 12 months, if applicable.

### **Deletion**

You have the right to request that we delete the Personal Data that we have collected about you, subject to certain exceptions under the CCPA: for example, we may need to retain your Personal Data to provide you with the Site or services or complete a transaction or other action you have requested, or if deletion of your Personal Data involves disproportionate effort. If your deletion request is subject to one of these exceptions, we may deny your deletion request.

### **Correction**

You have the right to request that we correct any inaccurate Personal Data we have collected about you. Under the CCPA, this right is subject to certain exceptions: for example, if we decide, based on the totality of circumstances related to your Personal Data, that such data is correct. If your correction request is subject to one of these exceptions, we may deny your request.

### **Exercising Your CCPA Rights**

To exercise the rights described above, you must send us a request that (1) provides sufficient information to allow us to verify that you are either the person about whom we have collected Personal Data or are an agent authorized by that person, and (2) describes your request in sufficient detail to allow us to understand, evaluate and respond to it. Each request that meets both of these criteria will be considered a "Valid Request." We may not respond to requests that do not meet these criteria. We will only use Personal Data provided in a Valid Request to verify your identity and complete your request.

**You may submit a Valid Request by emailing us at [investorrelations@polarispartners.com](mailto:investorrelations@polarispartners.com).**

We will work to respond to your Valid Request within 45 days of receipt. We will not charge you a fee for making a Valid Request unless your Valid Request(s) is excessive, repetitive or manifestly unfounded. If we determine that your Valid Request warrants a fee, we will notify you of the fee and explain that decision before completing your request.

You may also authorize an agent (an "Authorized Agent") to exercise your rights on your behalf. To do this, you must provide your Authorized Agent with written permission to exercise your rights on your behalf, and we may request a copy of this written permission from your Authorized Agent when they make a request on your behalf.

### **We Do Not Sell Your Personal Data**

We will not "sell" your Personal Data, as that term is defined in the CCPA, and have not done so over the last 12 months. We also do not sell the Personal Data of minors under 16 years of age.

### **Personal Data Sharing Opt-Out and Opt-In**

Under the CCPA, California residents have certain rights when a business "shares" Personal Data with third parties for purposes of cross-contextual behavioral advertising. We will not share your Personal Data for cross-contextual behavioral advertising, and have not done so over the last 12 months. To our knowledge, we do not share the Personal Data of minors under 16 years of age for purposes of cross-contextual behavioral advertising.

### **We Will Not Discriminate Against You for Exercising Your Rights Under the CCPA**

We will not deny you access to our Site or provide you a lower quality of services if you exercise your rights under the CCPA. If you have any questions about this section or whether any of the above rights apply to you, please contact us at [investorrelations@polarispartners.com](mailto:investorrelations@polarispartners.com).

## **PRIVACY RIGHTS OF OTHER UNITED STATES RESIDENTS**

### **California Resident Rights**

California residents are entitled to contact us to prevent disclosure of Personal Data to third parties for such third parties' direct marketing purposes, under California Civil Code Sections 1798.83-1798.84. If you would like to submit such a request, please contact us at [investorrelations@polarispartners.com](mailto:investorrelations@polarispartners.com).

### **Nevada Resident Rights**

If you are a resident of Nevada, you have the right to opt-out of the sale of certain Personal Data to third parties who intend to license or sell that Personal Data. If you are a Nevada Resident, you can exercise this right by contacting us at [investorrelations@polarispartners.com](mailto:investorrelations@polarispartners.com) with the subject line "Nevada Do Not Sell Request" and providing us with your name. Please note that we do not currently sell your Personal Data as sales are defined in Nevada Revised Statutes Chapter 603A.

## **PRIVACY RIGHTS OF EUROPEAN UNION AND UNITED KINGDOM RESIDENTS**

The Site is hosted and operated in the United States ("U.S.") by us and through our service providers, and if you do not reside in the U.S., laws in the U.S. may differ from the laws where you reside. If you are a resident of the European Union ("EU"), United Kingdom, Lichtenstein, Norway, or Iceland, you may have additional rights under the EU or UK General Data Protection Regulation (collectively, the "GDPR") with respect to your Personal Data, as outlined below. By using the Site, you acknowledge that any Personal Data about you, regardless of whether provided by you or obtained from a third party, is being provided to us in the U.S. and will be hosted on U.S. servers, and you authorize us to transfer, store and process your information to and in the U.S., and possibly other countries. You hereby consent to the transfer of your data to the U.S. pursuant to: (i) a data processing agreement incorporating standard data protection clauses promulgated by the European Commission, (ii) binding corporate rules for data protection that align with the GDPR's requirements, or (iii) adherence to an industry- or technology-specific approved code of conduct blessed by the European Commission.

For this section, we use the terms "Personal Data" and "processing" as they are defined in the GDPR, but "Personal Data" generally means information that can be used to individually identify a person, and "processing" generally covers actions that can be performed in connection with data such as collection, use, storage and disclosure. We will be the controller of your Personal Data processed in connection with your use of the Site.

If there are any conflicts between this this section and any other provision of this Privacy Policy, the policy or portion that is more protective of Personal Data shall control to the extent of such conflict. If you have any questions about this section or whether any of the following applies to you, please contact us at [investorrelations@polarispartners.com](mailto:investorrelations@polarispartners.com).

### **Personal Data Collection, Use and Disclosure**

The "Categories of Personal Data We Collect" subsection of this Privacy Policy above details the Personal Data that we collect from you, and "How We Disclose Your Personal Data" details how we may use or disclose your Personal Data.

### **Legal Basis for Processing**

We will only process your Personal Data if we have a lawful basis for doing so. Lawful bases for processing include consent, contractual necessity and our "legitimate interests" or the legitimate interest of others, as further described below.

Contractual Necessity. We may process Personal Data as a matter of "contractual necessity", meaning that we may need to process the data to perform under our Terms of Use with you, which enables us to provide you with the Site and our services. When we process data due to contractual necessity, failure to provide such Personal Data will result in your inability to use some or all portions of the Site that require such data.

Legitimate Interest. We process the following categories of Personal Data when we have a legitimate interest that is not outweighed by your privacy rights: Device/IP Data; Web Analytics; Other Identifying Information You Choose to Provide; We may also de-identify or anonymize Personal Data to further our legitimate interests.

Consent. In some cases, we process Personal Data based on the consent you expressly grant to us at the time we collect such data. When we process Personal Data based on your consent, it will be expressly indicated to you at the point and time of collection.

Other Processing Grounds. From time to time we may also need to process Personal Data to comply with a legal obligation, if it is necessary to protect the vital interests of you or other data subjects, or if it is necessary for a task carried out in the public interest.

## **EU and UK Data Subject Rights**

You have certain rights with respect to your Personal Data, including those set forth below.

Access. You can request more information about the Personal Data we hold about you and request a copy of such Personal Data.

Rectification. If you believe that any Personal Data we are holding about you is incorrect or incomplete, you can request that we correct or supplement such data.

Erasure. You can request that we erase some or all of your Personal Data from our systems.

Withdrawal of Consent. If we are processing your Personal Data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any time.

Portability. You can ask for a copy of your Personal Data in a machine-readable format. You can also request that we transmit the data to another controller where technically feasible.

Objection. You can contact us to let us know that you object to the further use or disclosure of your Personal Data for certain purposes, such as for direct marketing purposes.

Restriction of Processing. You can ask us to restrict further processing of your Personal Data.

Right to File Complaint. You have the right to lodge a complaint about our practices with respect to your Personal Data with the supervisory authority of your country or EU Member State. A list of Supervisory Authorities is available here: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

For more information about these rights, or to submit a request, please contact us at: [investorrelations@polarispartners.com](mailto:investorrelations@polarispartners.com).

Please note that in some circumstances, we may not be able to fully comply with your request, such as if it is frivolous or extremely impractical, if it jeopardizes the rights of others, or if it is not required by law, but in those circumstances, we will still respond to notify you of such a decision. In some cases, we may also need to you to provide us with additional information, which may include Personal Data, if necessary to verify your identity and the nature of your request.

## **CHANGES TO THIS PRIVACY POLICY**

We are constantly trying to improve our Site and services, so we may need to change this Privacy Policy from time to time, but we will alert you to any such changes by placing a notice on our website, by sending you an email and/or by some other means. Please note that if you've opted not to receive legal notice emails from us (or you haven't provided us with your email address), those legal notices will still govern your use of the Site and/or services, and you are still responsible for reading and understanding them. If you use the Site and/or services after any changes to the Privacy Policy have been posted, that means you agree to all of the changes. Use of information we collect is subject to the Privacy Policy in effect at the time such information is collected.

## **CONTACT INFORMATION**

If you have any questions or comments about this Privacy Policy, the ways in which we collect and use your Personal Data, or your choices and rights regarding such collection and use, please do not hesitate to contact us at: [investorrelations@polarispartners.com](mailto:investorrelations@polarispartners.com).