

POLARIS PARTNERS

PRIVACY NOTICE

Your Privacy is very important to us. This Privacy Notice is provided by Polaris Partners on behalf of itself and its affiliates, including the private investment funds and affiliated management entities which Polaris Partners manages or advises (the “Funds”), and explains the manner in which Polaris Partners and the Funds collect, utilize and maintain nonpublic personal information about the limited partners and members (hereafter, “Limited Partners”) of the Funds. This Privacy Notice applies only to Limited Partners who are individuals. All references in this notice to Limited Partners shall also be deemed to refer to members and assignees of any fund or investment vehicle that we manage that is organized as a limited liability company.

We are committed to protecting your privacy and maintaining the confidentiality and security of your personal information. We are sending you this Privacy Notice to help you understand how we handle the personal information about you that we collect and how we use that information. As used herein, the term “personal information” includes personal information as defined in the California Consumer Privacy Act, as amended by the California Privacy Rights Act of 2020 (“CCPA”) and “Personal Data” as defined in the European Union and United Kingdom’s General Data Protection Regulation (“GDPR”). The data controller is Polaris Partners.

Categories of Information We Collect and May Disclose, and the Lawful Bases for Processing

We use the personal information collected about you in order to provide you with better service or to comply with law. We will only collect and process Personal Data about you where we have lawful bases to do so. We do not knowingly collect or solicit Personal Data from anyone under the age of 16 without parent or guardian consent. We (including parties acting on our behalf) may collect nonpublic personal information about you from the following sources and for the following purposes:

- Investor Questionnaires, Limited Partnership Agreements or other forms (for example, personal identifiers and commercial information such as your name, address, Social Security number and/or other government-issued identification information, assets and income) necessary in order to enter into a contract and become a Limited Partner in one of our funds, or necessary to comply with law and regulations that apply to us and our funds (for example, securities laws, investment adviser regulations, anti-money laundering regulations and KYC obligations);
- Ownership records of the fund of which you are a Limited Partner (such as the amount of your percentage ownership interest and any capital commitment) necessary in order to enable or administer our funds or manage corporate transactions; and
- Other interactions with us or our affiliates (such as discussions or other contacts with our staff, via telephone, written correspondence, and electronic media) to help us understand and improve our fund business or investor relationships generally or to market an investment fund and any future funds to our current and former investors.
- From time to time we may also need to process personal information (a) with your explicit consent, (b) to comply with a legal obligation, (c) if it is necessary to protect the vital interests of you or other data subjects, or (d) if it is necessary for a task carried out in the public interest.

We may disclose nonpublic personal information we collect about you to our affiliates (including those who are involved in the operation, administration or management of, or the sale of interests in the fund of which you are a Limited Partner) and nonaffiliated service providers and regulators, in each case, only as

permitted by law. For example, we may share nonpublic personal information about you in the following situations:

- In connection with the administration and operations of the fund of which you are a Limited Partner including disclosure to attorneys, accountants, brokers, dealers, auditors, administrators, or companies that assist us with mailing statements or processing your transactions, or other professionals;
- In connection with the periodic financial reports that include capital account balances;
- To respond to a subpoena or court order, judicial process or regulatory inquiry; and
- At your direction or with your consent, including upon your authorization to disclose such information to persons acting in a fiduciary or representative capacity on your behalf.

We do not sell or otherwise disclose your nonpublic personal information for monetary or other valuable consideration. 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 with notice.

Note that certain information – such as Social Security numbers and certain other government ID-related information – may be considered “sensitive personal information” under the CCPA. If you are a California resident, please note that we only use or disclose your sensitive personal information as authorized under the CCPA and we do not collect or process sensitive personal information with the purpose of inferring any characteristics about California residents.

The information of our former Limited Partners is treated in the same manner as the information of our current Limited Partners.

Transfers to the United States

Our funds operate out of the United States and, as a result, intend to transfer Personal Data to its operation centers in the United States and other Non-Equivalent Countries (as defined below). This transfer is a matter of contractual necessity for us to enter into, perform, and administer such fund’s operative agreement with you, and to implement pre-contractual measures at your request. For the purposes of this section, “*Non-Equivalent Country*” shall mean a country or territory other than (i) a member state of the EEA; (ii) the United Kingdom (“UK”); or (iii) a country or territory which the European Commission has deemed, at the relevant time and in accordance with applicable European Union (“EU”) data protection laws, to ensure an adequate level of protection for Personal Data.

Data Retention

We retain your personal information during the period you are a Limited Partner in a fund we manage, and for as long thereafter as is necessary to comply with applicable laws and regulations. When establishing a retention period for specific categories of data, we consider who we collected the data from, our need for the personal information, why we collected the personal information, and the sensitivity of the personal information. To request a deletion of data we are not otherwise required to retain, please see below.

Confidentiality and Security

We have always considered the protection of sensitive information to be a sound business practice and a foundation of customer trust. We protect personal information we collect about you by maintaining physical, electronic and procedural safeguards.

Within our management entities, we restrict access to nonpublic personal information about you to those employees who need to know that information to provide products or services to you.

Your Rights

You can contact us via email at investorrelations@polarispartners.com for any of the following reasons:

- To learn more about what personal information of yours is being processed, how and why such information is processed, and the third parties who have access to such personal information;
- To request access to your personal information in our possession;
- To rectify inaccurate personal information in our possession;
- To request that we erase some or all of your personal information from our systems (subject to certain exceptions and limitations);
- To request restriction of processing or object to such processing, in certain circumstances;
- If your consent was required as a condition to processing your personal information, to withdraw such consent at any time; and
- To object to further use or disclosure of your personal information in certain circumstances.

In order to comply with your request, you may need to provide us with personal information and other information to verify your identity and the nature of your request. Please note that in some circumstances, we may not be able to fully comply with your request, for example if we are required to retain certain information about you to comply with applicable laws and regulations or if the information is necessary in order for us to provide the services you requested. In particular, we, and our collection and processing of your personal information, may be governed by laws and regulations on anti-money laundering, fraud prevention, taxation and financial services. We will not discriminate against you for exercising your rights under the CCPA or the GDPR. We will not deny you access to our services, or provide you a lower quality of services if you exercise your rights under the CCPA or the GDPR.

Effective Date of Policy

This policy is effective as of March 12, 2025.

Further Information

We reserve the right to change this Privacy Notice at any time. If we make changes that affect your personal information, we will send you an updated Privacy Notice prior to any such changes taking effect. If you object to any changes, please contact us via email at investorrelations@polarispartners.com. The examples contained within this notice are illustrations and are not intended to be exclusive. This Privacy Notice is

intended to comply with the GDPR, CCPA and the Gramm-Leach Bliley Act. You may have additional rights under other foreign or domestic laws that may apply to you.