



June 2024

Privacy Notice

Important information and who we are

Your privacy is very important to us. This notice (this “Privacy Notice”) is provided by Glade Brook Capital Partners LLC and GB Private Partners LLC (“we” or “us”), the investment managers of various investment vehicles (together with such other investment vehicles as may be added in the future, the “Funds”), on behalf of the Funds, and sets forth the policies of the Funds with respect to the collection, sharing and protection of non-public personal information of the Funds’ investors, prospective investors and former investors. These policies are subject to change at any time, provided a notice of such change is given to you. Please read this Privacy Notice carefully to understand what we do. If you have any questions about this privacy notice and/or our personal data processing practices, please use the contact details included within this Privacy Notice.

We do not consider that the EU General Data Protection Regulation, the UK General Data Protection Regulation, or related data protection laws in the European Economic Area or the United Kingdom apply to our processing of your personal data.

The data we collect about you and how your personal data is collected

We collect and maintain personal information, such as (but not limited to) your name, address, phone number, social security number, employment, assets, transactions, income and other household information, for example, when you: (i) provide it to us in this Subscription Agreement, investor questionnaires and other related documents; (ii) provide it to us in correspondence and conversations with the Funds’ representatives; or (iii) make transactions with the Funds, such as when you invest in the Funds, tell us where to send money or make a wire transfer. We also may collect your personal information from other sources, such as affiliates (*i.e.*, financial and non-financial companies related by common ownership or control), or from an investor’s purchaser, representative, financial advisor, investment consultant or other financial institution with whom we have a relationship and/or whom the investor may have authorized to provide such information to us. We may also collect personal data provided by you in recorded calls.

We may also collect special categories of personal data including health, disability and religious or ethnicity information) where provided by you, with your consent, such as disability information or religious data for purposes required by you such as scheduling of meetings or access to our premises or our services.

How we use your personal data

We collect your personal data to fulfill our contractual obligations, our statutory obligations and/or our legitimate interests (where our legitimate interests are not overridden by your data protection interests or fundamental rights and freedoms) or those of the Funds, including: (i) for compliance with legal and regulatory requirements such as regulations aimed at prevention of money laundering or terrorist financing or “Know your Client” requirements, as well as to verify the status and/or eligibility of our clients for investment services offered by us and for compliance with tax reporting requirements, (ii) for purposes of reporting to, or communicating with, our clients concerning their investment in the Funds, (iii) in connection with our investment activities, including investment due diligence or investment monitoring activities or in response to “Know your Client” requirements of counter-parties, (iv) in connection with litigation, investigations, regulatory or governmental enquiries or for other legal or regulatory purposes involving us, the Funds or our clients, and (v) for other legitimate business interests including, but not limited to, running, growing and developing our business and for providing excellent client service.

If you have provided special categories of personal data to us to enable us to respond to certain requests by you such as access requests or scheduling of meetings or similar requirements, we do so with your consent and/or on the grounds of legal necessity.

In addition, we may, with your consent, process your personal data in order to communicate with you for marketing purposes. In this event, we may provide additional information that we believe may be of interest, including about funds or services, news updates, research or market commentary, conferences, or events offered by or in conjunction with us. You have the right to unsubscribe when you have provided your consent to receive these communications by emailing us at the address below or by following the instructions in any such communication, e.g., by clicking on the link to unsubscribe.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case.

For the avoidance of doubt, we do not sell your personal data. No mobile information will be shared with third parties/affiliates for marketing/promotional purposes. All the above categories exclude text messaging originator opt-in data and consent; this information will not be shared with any third parties.

Disclosures of your personal data

Except as may be required or permitted by law, we do not disclose any personal information about our investors, prospective investors or former investors without their prior consent. Such permitted or required disclosure may include, without limitation, the disclosure of personal information about our investors, prospective investors or former investors to affiliates (*i.e.*, financial and non-financial companies related by common ownership or control), non-affiliates (*i.e.*, financial or non-financial companies not related by common ownership or control), or other third parties with a need to know such information for our everyday business purposes, such as to process your transactions, maintain and service your account(s), or respond to court orders and legal investigations. We may also share your personal data with our service providers *e.g.*, attorneys, auditors, accountants, tax advisers, administrators, custodians, depositaries, distribution managers and brokerage firms, event organizers or other agent, adviser or service provider of us or any Fund. Thus, it may be necessary, under anti-money laundering and similar laws, to disclose information about the Funds' investors in order to accept subscriptions from them. You cannot limit these types of sharing, but if such a disclosure is made, the Funds will require such third parties to treat your personal information with confidentiality.

We may also share information with third parties or our affiliates to market to you. You may prevent this type of sharing by calling Hallie Ross at (203) 861-3012. If you are a *new* investor, we can begin sharing your information thirty (30) calendar days from the date we sent this Privacy Notice. When you are *no longer* our investor, we may continue to share your information as described in this Privacy Notice. However, you may contact us at any time to limit our sharing. If you limit sharing for an account you hold jointly with someone else, your choices will apply to everyone on your account. State laws may give you additional rights to limit sharing.

On all occasions when it is necessary for us to share your personal information with other parties, we will require that such information only be used for the limited purpose for which it is shared and will advise these companies not to further share your information with others except to fulfill that limited purpose.

Security

We take our responsibility to protect the privacy and confidentiality of your information very seriously. To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include appropriate physical, electronic and procedural safeguards. If we materially change our privacy policies to permit us or our affiliates to share additional information we have about you or to permit disclosures to additional types of parties, you will be notified in advance, and, if required by law, you will be given the opportunity to consent to such disclosure, as appropriate, or opt out of such additional disclosure and to direct us not to share your information with such parties.

Your legal rights

You have certain rights relating to the personal data we hold to: (i) check whether we hold personal data about you and to access such data (in accordance with our policy); (ii) request the correction of personal data about you that is inaccurate; (iii) have a copy of the personal data we hold about you provided to you or another controller where technically feasible; (iv) object to the processing of your personal data; (v) request the erasure of your personal data; and (v) request the restriction of processing concerning you. To do so, please send your request to hross@gladebrookcapital.com.

If you provided consent for us to use your personal data, including for marketing purposes, you have the right to withdraw consent and we will process this withdrawal promptly. This will not affect the lawfulness of any processing carried out before you withdrew your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Data retention

We retain your personal data for a period of at least five (5) years from the date on which the relevant business relationship, for which purpose such personal data was provided, has ended.

Changes to your personal data

You are required to ensure the personal data we hold about you is up-to-date and accurate, and you must notify us of any changes to the personal data you provided to us, for example, in information supplied in relation to an investment in the applicable Fund.

Your California Privacy Rights:

We comply with the California Consumer Privacy Act of 2018 (“CCPA”) by providing California residents with the following rights with respect to their personal information:

The right to know what personal information we have collected, used, disclosed and sold. To submit a request to know, California residents may call the Investment Manager at (203) 861-3012. For the avoidance of doubt, we do not sell your personal data.

The right to request that we delete any personal information we have collected. To submit a request for deletion, California residents may call the Investment Manager at (203) 861-3012.

When California residents exercise these rights and submit a request, the applicable Fund will verify their identity by asking them for their email address, telephone number, and/or information about their account with the applicable Fund. We will endeavor to honor customers’ requests unless such a request conflicts with certain lawful exemptions under the CCPA. Please note that we are only required to honor such requests twice in a twelve (12) month-long period.

Exercise of these rights will have no adverse effect on the price and quality of the applicable Fund’s services.

For the twelve (12) month-long period prior to the date of this Privacy Notice, the applicable Fund has not sold any personal information about its customers; nor does it have any plans to do so in the future.

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If you have any questions about this Privacy Notice, please contact Hallie Ross at (203) 861-3012 or hross@gladebrookcapital.com.