

# HarbourVest Global Privacy Policy

Effective Date: May 25, 2018

Last Updated: January 03, 2020

This Privacy Policy describes how we at HarbourVest Partners, LLC, including our affiliates and subsidiaries (collectively, “we” or “HarbourVest”) collect, use and share the Personal Information that we gather through the websites, mobile apps, other digital properties, and paper forms that are collected, operated, and used by HarbourVest and that link to this Privacy Policy (collectively, the “Services”).

If you are in the United States (“U.S.”), Canada, European Union, European Economic Area (“EEA”) and/or the United Kingdom, HarbourVest Partners, LLC, who owns and operates the Service that you are visiting will be the data controller responsible for the collection and use of your Personal Information. If you have invested into an entity organized under the laws of the Cayman Islands, that Cayman Islands entity is the data controller.

If you have any questions about this Privacy Policy or our information practices, please contact us using the options provided below.

Please read this Privacy Policy carefully. By using our Services, you consent to the information practices and other terms set forth in this Privacy Policy.

## **How We Collect and Use Personal Information**

When we use the term “Personal Information,” we mean information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual or household. We collect several categories of Personal Information through our Services, including information you provide, information collected automatically from your device (including laptop or personal computer), and information we obtain from third party sources. We use and share this Personal Information for the purposes described below, including as described under Additional Uses of Personal Information.

We rely on separate and overlapping basis to process your Personal Information lawfully. By way of example, it may be necessary for us to process your Personal Information in certain ways in order to process any action you may have requested or otherwise in accordance with a contract between us, or in certain cases we may process your Personal Information where necessary to further our legitimate interests, where those legitimate interests are not overridden by your rights and interests.

## **Information You Provide**

We collect Personal Information you provide, for example when you enter the information into form fields on our Services or provide the information via paper documents. For example, we may collect:

<b><i>Category of Personal Data</i></b>	<b><i>Purposes of Processing (see also Additional Uses of Personal Information below)</i></b>	<b><i>Legal Basis for Processing</i></b>
<b>Contact Information</b>	To communicate with, pay funds to, keep records for, contract with, and	Legitimate interest

<b>Category of Personal Data</b>	<b>Purposes of Processing (see also Additional Uses of Personal Information below)</b>	<b>Legal Basis for Processing</b>
<i>including</i> name, telephone number, address, email address, and signature	<p>provide services to investors (including prospective investors, herein referred collectively as “Investor” or “Investors”), vendors, employees, or other contacts;</p> <p>To perform marketing and research services for Investors;</p> <p>To perform due diligence on, or monitor target or portfolio company’s key organizational individuals, key customers, partners, suppliers, shareholders, and debtholders;</p> <p>To perform background screening of Investors, investment partners, and prospective/current/retired employees;</p> <p>To perform employment decisions and screenings of prospective employees;</p> <p>To perform employee recruiting;</p> <p>To authenticate users; and</p> <p>To meet relevant regulatory requirements.</p>	<p>Performance of contract</p> <p>Legal compliance</p> <p>Consent (where applicable)</p>
<b>Employment Information</b> <i>including</i> title/role, institution/company, location, compensation, work history, and qualification/training	<p>To perform due diligence on or monitor target or portfolio company’s key organizational individuals, key customers, partners, suppliers, shareholders, and debtholders; and</p> <p>To perform background screening of Investors, investment partners, and employees.</p>	<p>Legitimate interest</p> <p>Legal compliance</p> <p>Performance of contract</p> <p>Consent (where applicable)</p>
<b>Account/Financial Information</b> <i>including</i> Contact Information, date of birth, bank account information, wire transfer information, expense details, beneficiary designation, Investor commitments, ledgers,	<p>To perform fund/subscription processes, accounts, records, marketing, and onboarding services for Investors;</p> <p>To perform background screening of Investors and employees;</p>	<p>Legitimate interest</p> <p>Performance of contract</p> <p>Legal compliance</p>

<b>Category of Personal Data</b>	<b>Purposes of Processing (see also Additional Uses of Personal Information below)</b>	<b>Legal Basis for Processing</b>
positions, balances, percentages of fund, credit information, and share or option numbers, values, and vesting	<p>To meet relevant regulatory requirements;</p> <p>To communicate with, pay funds to, keep records for, contract with, and provide services to Investors, vendors, and employees; and</p> <p>To perform due diligence on or monitor target or portfolio company's key organizational individuals, key customers, partners, suppliers, shareholders, and debtholders.</p>	
<p><b>Government Identification Information</b> <i>including</i> Social Security number (or equivalent in non-U.S. countries), taxpayer identification number, date of birth, driver's license, passport, other official government identification and numbers, legal work status, and Know Your Client ("KYC") details</p>	<p>To perform marketing and research services for Investors;</p> <p>To perform background screening of Investors and employees;</p> <p>To meet relevant regulatory requirements;</p> <p>To comply with tax requirements; and</p> <p>To accept/process funds from, pay funds to, keep records for, contract with, and provide services to Investors, vendors and employees.</p>	<p>Legitimate interest</p> <p>Performance of contract</p> <p>Legal compliance</p> <p>Consent (where applicable)</p> <p>Employment (where applicable)</p>
<p><b>Investment Analytics Information</b> <i>including</i> investment history, proposals or recommendations, and preferences</p>	<p>To perform Investor advisory services; and</p> <p>To perform due diligence on target or portfolio company's shareholders and debtholders.</p>	<p>Legitimate interest</p> <p>Performance of contract</p>
<p><b>Certification Information</b> <i>including</i> business partners or employee certification/accreditation details, conflicts information, approvals, registrations, licenses, and consents</p>	<p>To meet relevant regulatory requirements; and</p> <p>To perform background screening of Investors, investment partners, and employees.</p>	<p>Legitimate interest</p> <p>Legal compliance</p> <p>Consent (where applicable)</p>
<p><b>Identification Information</b> <i>including</i> photo, log-ins, dial-ins, and codes</p>	<p>To secure physical and digital access control, electronic communications, and electronic asset management;</p>	<p>Legitimate interest</p> <p>Employment</p>

<b>Category of Personal Data</b>	<b>Purposes of Processing (see also Additional Uses of Personal Information below)</b>	<b>Legal Basis for Processing</b>
	To perform marketing and research services for Investors; and  To perform investment presentations.	

### Information Collected Automatically

As is true of most digital platforms, we gather certain information automatically when you use our Services. This information may include browser, device, cookie and similar data that we collect as follows:

<b>Category of Personal Data</b>	<b>Purposes of Processing (see also Additional Uses of Personal Information below)</b>	<b>Legal Basis for Processing</b>
<b>Log Files</b> <i>including</i> IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp, and clickstream data	To maintain the security of HarbourVest services, for fraud detection, and to protect HarbourVest's rights; and  To manage HarbourVest services and email messages and to collect and track information about user activities online over time and across different websites and social media channels.	Legitimate interests
<b>Cookies, Analytics and Related Technologies</b> For more information, including on how to control your privacy settings and your ad choices, please read our <a href="#">Cookie Policy</a>	To manage HarbourVest services and email messages and to collect and track information about user activities online over time and across different websites and social media channels.	Legitimate interests  Consent (where applicable)
<b>Location Information</b> <i>including</i> latitude, longitude, date, and time (the precision of this data varies greatly and is determined by factors controlled by your device or mobile service provider)	To offer certain location-based services, such as delivering marketing that is location-relevant, and to conduct analytics to improve HarbourVest services.	Legitimate interests  Consent (where applicable)
<b>Access Control Information</b> <i>including</i> user names, email address, IP address, and location pings	To authenticate users;  To secure digital access control for employees; and	Legitimate interest

	To perform recordkeeping and tracking in enterprise and storage software for employees.	
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**Information We Obtain from Third Party Sources**

We may obtain certain Personal Information about you from third party sources, which we may use to serve our legitimate interests, comply with legal obligations, perform a contract, or in some cases, in accordance with your consent.

**Business Partners and Service Providers:** We use business partners and service providers, such as payment processors and analytics providers, to perform services on our behalf. Some of these partners have access to Personal Information about you that we may not otherwise have (for example, where you sign up directly with that provider) and may share some or all this information with us. We use this information to administer the Services and conduct marketing and advertising campaigns as well as to process transactions that you request.

**Supplemental Information:** We may receive additional Personal Information from third party sources, such as public/subscription-based databases, which we may append to existing Investor and business partner information, such as email address verification. We may use this supplemental information to process actions that you may request and to prevent fraud and to improve our operations, Services and our marketing offerings.

**Additional Uses of Personal Information**

In addition to the uses described above, we may use your Personal Information for the following purposes, which uses may under certain circumstances be based on your consent, may be necessary to fulfill our contractual commitments to you, and are necessary to serve our legitimate interest, for example in the following business operations:

- Operating our business, administering the Services and managing your accounts;
- Contacting you to respond to your requests or inquiries;
- Processing and completing your transactions including, as applicable, electronic confirmations, processing payments and delivering services;
- Providing you with newsletters, articles, service alerts or announcements, event invitations, and other information that we believe may be of interest to you;
- Providing you with marketing information, and other information that are personally tailored to your interests and investment profile;
- Conducting market research, surveys, and similar inquiries to help us understand trends and Investor needs;
- Administering Investor profiles, analyzing your investments with us, presenting customized marketing, and improving our services, programs, and other materials or potential investment offerings;
- Alerting you about a correction of any provided marketing material;
- Preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of Personal Information, our website or data systems; or to meet legal or regulatory obligations;
- Enforcing our Terms of Use and other agreements; and

- Sending you push notifications when you sign up for one of our messaging programs. These messages may be sent by automated means. You may opt out of these message programs by following the instructions in the “Your Privacy Choices” section.

### **Legitimate Interests**

We rely on several legitimate interests in using and sharing your Personal Information. These interests include, but are not limited to:

- communicating with, paying funds to, keeping records for, and providing Services for you;
- performing due diligence and contractual obligations;
- filing for regulatory and legal compliance;
- improving and customizing the Services for you;
- understanding how the Services are being used;
- obtaining insights into usage patterns of the Services;
- exploring ways to grow, administer, develop and market our business;
- ensuring the safety, security, and legal compliance of the Services; and
- enhancing protection against fraud, spam, harassment, intellectual property infringement, crime and security risks, including, if applicable, through background screening.

### **Data Retention**

We will retain your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy, subject to your right, under certain circumstances, to have certain of your Personal Information erased (see Your Rights below), unless a longer period is required under applicable law or is needed to resolve disputes or protect our legal rights subject to any statutory limitation.

### **How We Share and Disclose Personal Information**

We share your Personal Information with third parties only in the ways described in this Privacy Policy. We may share your Personal Information within HarbourVest, with service providers and business partners, in connection with HarbourVest transactions and to comply with the law and enforce our legal rights.

**Service Providers:** We share your Personal Information with third party service providers who complete transactions or perform services on our behalf or for your benefit, such as for payment processing, marketing, analytics, processing employment applications and performing human resources administration or to verify personal data, such as mailing addresses.

**Affiliates:** We may share your Personal Information with affiliated legal entities within HarbourVest for purposes and uses that are consistent with this Privacy Policy.

**Business Partners:** We may share your Personal Information with our business partners for the purpose of administering programs and services, such as (but not limited to) Investor onboarding, anti-money laundering review, and Investor background/sanctions examination.

**Third Party Mobile App Providers:** With your knowledge and consent, the Services may gather and transfer your Personal Information, including location information, from and to other applications, functions and tools within your mobile device.

**Legal Process, Safety and Terms Enforcement:** We may disclose your Personal Information to legal or government regulatory authorities as required by applicable law. We may also disclose your Personal Information to third parties as required by applicable law in connection with background screens, claims, disputes or litigation, when otherwise required by applicable law, or if we determine its disclosure is necessary to enforce our legal rights or contractual commitments that you have made.

**Business Transfers:** Your Personal Information may be disclosed as part of a corporate business transaction of HarbourVest, such as a joint venture, or financing or sale of company assets, and could be transferred to a third party as one of the business assets in such a transaction. It may also be disclosed in the event of insolvency, bankruptcy or receivership. You will be notified via email and/or a prominent notice on any affected Service of any change in ownership or uses of Personal Information, as well as your choices regarding Personal Information about you.

In the context of the above mentioned purposes, the Data Controller may delegate the processing of the Personal Data, in compliance and within the limits of the applicable laws and regulations, to other data recipients which refer to, inter alia, the Manager, the sub-advisor, the investment adviser, the depositary, the Paying Agent and the Registrar and Transfer Agent, or other entities (the "Recipients").

The Recipients may, under their own responsibility, disclose the Personal Data to their agents and/or delegates (the "Sub-Recipients"), which shall process the Personal Data for the sole purposes of assisting the Recipients in providing their services to the Data Controller and/or assisting the Recipients in fulfilling their own legal obligations.

### **International Data Transfers**

We may transfer your Personal Information within HarbourVest and/or to the third parties discussed above. Your Personal Information may be transferred to, stored, and processed in a country other than the one in which it was collected. We may transfer your Personal Information outside the European Economic Area ("EEA") or the Cayman Islands, including to the United States, and when we do so, we rely on appropriate or suitable safeguards recognized under data protection laws.

**Standard Contractual Clauses:** The European Commission has adopted standard data protection clauses, which provide safeguards for Personal Information transferred outside of the EEA. We generally use Standard Contractual Clauses when transferring Personal Information from a country in the EEA to a country outside the EEA, including the United States. EEA individuals can request a copy of our Standard Contractual Clauses by contacting us as set forth in the Contact Us section below. For transfers outside of the Cayman Islands, appropriate clauses based on the standard data protection clauses shall be used.

**EU-US Privacy Shield:** If we transfer any of your Personal Information from the EEA to a third party outside the EEA who is certified under the EU-US Privacy Shield Framework as set forth by the U.S. Department of Commerce, we may rely on such certification to ensure adequate

protection for your Personal Information so transferred. You can learn more about Privacy Shield by visiting <https://www.privacyshield.gov/>. For transfers outside of the Cayman Islands, appropriate clauses based on the EU-US Privacy Shield Framework shall be used.

**With your consent:** In respect of certain cross-border personal data transfers, we will obtain your consent to transfer your Personal Information outside the EEA or the Cayman Islands after first informing you about the possible risks of such a transfer.

**By contract:** We will transfer your Personal Information outside the EEA or the Cayman Islands if the transfer is necessary to the performance of a contract between you and HarbourVest, or if the transfer is necessary to the performance of a contract between HarbourVest and a third party, and the contract was entered into in your interest.

In addition, we may transfer your Personal Information outside the EEA or the Cayman Islands if the transfer is necessary to establish, exercise or defend legal claims or to protect your vital interests.

### **Additional Policies**

Certain websites, other digital properties or paper forms included in the Services may contain additional disclosures related to your privacy.

### **Children's Privacy**

We are committed to protecting the privacy of children. Our Services are not directed to, and we do not intend to or knowingly collect or solicit Personal Information online from children under the age of 18. If you are under the age of 18, do not provide us with any Personal Information.

### **Your Rights**

We process all Personal Information in line with your rights, in each case to the extent required by and in accordance with applicable law (including in accordance with any applicable time limits and fee requirements).

#### **Residents of the EEA and the Cayman Islands**

For EEA individuals and investors into Cayman Islands entities, upon request, we will provide you with information about whether we hold any of your Personal Information along with any details required to be provided to you under applicable law. In certain cases, you may also have a right to:

- rectify any of your Personal Information that is inaccurate;
- to restrict or limit the ways in which we use your Personal Information;
- to object to the processing of your Personal Information;
- to request the deletion of your Personal Information;
- to obtain a copy of your Personal Information in an easily accessible format; and
- request for personal data portability.

To submit a request, please contact us as set forth in the Contact Us section below. We will respond to your request within a reasonable timeframe.

You also have the right to withdraw your consent to our processing of your Personal Information, where our processing is solely based on your consent. You can do this by discontinuing use of the Services, including by editing all of your online profiles with us and contacting us as set forth in the Contact Us section below to request that your Personal Information be deleted. If you withdraw your consent to the use or sharing of your Personal Information for the purposes set out in this Privacy Policy, you may not have access to all (or any) of the Services, and we might not be able to provide you all (or any) of the Services. Please note that, in certain cases, we may continue to process your Personal Information after you have withdrawn consent and requested that we delete your Personal Information, if we have a legal basis to do so. For example, we may retain certain information if we need to do so to comply with an independent legal obligation, or if it is necessary to do so to pursue our legitimate interest in keeping the Services safe and secure.

If you have any complaints regarding our privacy practices, you have the right to lodge a complaint with the CNPD at the following address: 1, Avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette, Grand-Duchy of Luxembourg; or with any competent data protection supervisory authority.

### **Residents of the State of California**

Under California law, individuals who are residents of California and whose Personal Information is collected and processed by HarbourVest may have certain legal rights with respect to the Personal Information. These include:

- The right to request access to Personal Information collected about you by HarbourVest dating back one year before the access request is made. Specifically, you have the right to ask that HarbourVest disclose (i) the categories of Personal Information HarbourVest has collected; (ii) the categories of sources from which HarbourVest collects Personal Information; (iii) the business or commercial purpose for collecting Personal Information; (iv) the categories of third parties with whom HarbourVest shares Personal Information; (v) the specific pieces of Personal Information HarbourVest has collected; and (vi) if HarbourVest disclosed your Personal Information for a business purpose, a list of the categories of Personal Information HarbourVest has disclosed in the prior 12 months.
- The right to request that HarbourVest delete your Personal Information. HarbourVest will not delete Personal Information if HarbourVest needs it in order to service your account, to protect the security or functionality of HarbourVest's operations, to comply with legal and regulatory obligations, or for certain other reasons.

HarbourVest does not sell Personal Information.

You may submit requests for access or deletion to HarbourVest via the methods set forth in the Contact Us section below.

Only you, or a person registered with the California Secretary of State that is authorized by you to act on your behalf, may submit a request for access to, or deletion of, your Personal Information.

In connection with an access or deletion request, HarbourVest will undertake steps to verify your identity. HarbourVest may ask you to provide information that HarbourVest has on file about you or, if the request is submitted in writing or online, HarbourVest may contact you via another

method (e.g., phone) to verify your identity. HarbourVest will only use Personal Information provided in a request to verify the requestor's identity and authority to make the request and HarbourVest will maintain a record of access and deletion requests as required by law.

HarbourVest will not deny services, charge different prices, offer a different quality of service or otherwise discriminate against an individual for exercising the rights afforded to him or her under the California Consumer Privacy Act, Cal. Civ. Code §§ 1798.100–.199.

### **Links to Third Party Sites and Social Media**

The Services may include links to websites and digital services operated by third parties. This Privacy Policy does not apply to, and we are not responsible for the content, privacy policies or data practices of third parties that collect your information. We encourage you to review the privacy policies for those third parties to learn about their information practices.

The Services may feature “share” buttons and widgets hosted by other companies. These features may collect your IP address, which page you are visiting on our Service and may set a cookie to enable the feature to function properly. The loading, functionality and your use of the plugins are governed by the privacy policy and terms of the third party that provided the plugin.

### **Updates to the Privacy Policy**

This Privacy Policy is subject to occasional revision, and if we make any material changes in the way we use your Personal Information, we will notify you by sending you an email to the last email address you provided to us and/or by prominently posting notice of the changes on the Services and updating the effective date above, or, where required by law, obtain explicit consent to use your Personal Information for this new purpose.

Any changes to this Privacy Policy will be effective upon the earlier of thirty (30) calendar days following our dispatch of an email notice to you or thirty (30) calendar days following our posting of notice of the changes on the Services. These changes will be effective immediately for new users of our Services.

Please note that at all times you are responsible for updating your Personal Information to provide us with your most current email address, along with any other provided contact information or settings. In the event that the last email address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the email containing such notice will nonetheless constitute effective notice of the changes described in the notice.

If you do not wish to permit changes in our use of your Personal Information, you must notify us prior to the effective date of the changes and discontinue using the Services. Continued use of our Services, following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

### **Managing Communication Preferences**

If you have opted in to our marketing communications (or where permitted by law, if you have provided us with your contact information), we may send you email messages, direct mail marketing, push notifications or other communications regarding services depending on the

method of communication selected. You may ask us not to do so when you access our websites or mobile applications, or change your preferences by updating any accounts you have with us. At any time, you may elect to discontinue receiving commercial messages from us by submitting an opt-out request to the contact information below or by following the unsubscribe instructions in the form of the communication you received, as described below.

**Printed/Electronic Materials:** To opt out of receiving printed/electronic marketing materials at your postal/email address, please contact us at either of the addresses below. Please be sure to include your name and mailing/email address exactly as they appear on the respective marketing materials you received.

**Emails:** To opt out of receiving marketing communications via email, please send an unsubscribe request to the email address below or click on the unsubscribe link at the bottom of the email that was sent to you and follow the directions on the resulting web page. Please note that you may continue to receive certain transactional or account-related electronic messages from us.

**Push Notifications:** To opt out of receiving push notifications, please set your preferences within your device setting menu.

#### **Contact Us**

If you have any questions, comments, requests or concerns about this Privacy Policy or other privacy-related matters, you may contact us in the following ways:

Email: [privacy@harbourvest.com](mailto:privacy@harbourvest.com)  
Address: HarbourVest Partners, LLC  
ATTN: Compliance Department  
One Financial Center  
Boston, MA 02111

#### **Contact Form**

For purposes of the General Data Protection Regulation, please contact [privacy@harbourvest.com](mailto:privacy@harbourvest.com).