

## CALIFORNIA PRIVACY DISCLOSURES

Last updated March 2025

Prior versions of these California Privacy Disclosures are available upon request.

### **Scope of Notice**

These California Privacy Disclosures supplement the Adams Street Partners, LLC Privacy Notice with respect to specific rights granted under the California Consumer Privacy Act of 2018, as amended, (“CCPA”), to natural person California residents and provides information regarding how such California residents can exercise their rights under the CCPA. These California Privacy Disclosures are only relevant to you if you are a resident of California as determined in accordance with the CCPA. Information required to be disclosed to California residents under the CCPA regarding the collection of their personal information that is not set forth in these California Privacy Disclosures is otherwise set forth in the Privacy Notice. To the extent there is any conflict with the privacy requirements under the Gramm-Leach-Bliley Act and/or Regulation S-P (“GLB Rights”), GLB Rights shall apply.

Unless otherwise expressly stated, all terms in these California Privacy Disclosures have the same meaning as defined either in our Privacy Policy, Privacy Notice, or as otherwise defined in the CCPA.

### **Categories of Personal Information We Collect**

In the last 12 months, we have (i) collected the following categories of personal information and (ii) not knowingly sold Personal Information about you; however, we may have disclosed certain categories of Personal Information (a) pursuant to business purposes as described listed below or (b) otherwise in accordance with law. We collect personal information from the sources set forth in the section titled: “Sources of Personal Information” contained in our Privacy Notice. Adams Street may make such disclosure (x) within Adams Street and/or (y) to a variety of third parties for business purposes as is further described in the section titled: “Our Disclosure of Personal Information” in our Privacy Notice.

We have highlighted in the below chart the most common sources of information as well as the most common recipients of such data; provided, however, that (i) such chart should be read in conjunction with our standalone Privacy Notice which may contain additional detail and (ii) we may also disclose your information to other parties as may be required by law or regulation, or in response to regulatory inquiries:

Category of Personal Information	Collected	Categories of Sources	Disclosed	Category of Third-Party Recipients	Commercial or Business Purpose
<p><b>Identifiers</b>, such as your name, email address, phone number, postal address, investor login username and password, social security number, and passport number</p>	✓	<ul style="list-style-type: none"> <li>• Current and prospective investors</li> <li>• Individuals who contact us</li> <li>• Industry contacts</li> <li>• Information providers</li> <li>• Publicly available sources</li> </ul>	✓	<ul style="list-style-type: none"> <li>• Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents.</li> </ul>	<ul style="list-style-type: none"> <li>• Common Purposes described below</li> </ul>
<p><b>California Customer Records</b> (Cal. Civ. Code § 1798.80(e)), such as your telephone number, signature, other financial information (including accounts and transactions with other institutions and anti-money laundering information), verification documentation and information regarding investors' status under various laws and regulations (including social security number, tax status, income and assets), bank account number, and transactions with us.</p>	✓	<ul style="list-style-type: none"> <li>• Current and prospective investors</li> </ul>	✓	<ul style="list-style-type: none"> <li>• Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents.</li> </ul>	<ul style="list-style-type: none"> <li>• Common Purposes described below</li> </ul>
<p><b>Protected Classification Characteristics</b>, such as your date of birth, national origin and citizenship status</p>	✓	<ul style="list-style-type: none"> <li>• Current and prospective investors</li> </ul>	✓	<ul style="list-style-type: none"> <li>• Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents.</li> </ul>	<ul style="list-style-type: none"> <li>• Common Purposes described below</li> </ul>

Category of Personal Information	Collected	Categories of Sources	Disclosed	Category of Third-Party Recipients	Commercial or Business Purpose
<b>Commercial Information</b> , such as your account data and other information contained in any document provided by investors to authorized service providers (whether directly or indirectly), risk tolerance, transaction history, investment experience and investment activity, information regarding a potential and/or actual investment in the applicable fund(s), including ownership percentage, capital investment, income and losses, source of funds used to make the investment in the applicable fund(s).	✓	<ul style="list-style-type: none"> <li>• Current and prospective investors</li> <li>• Industry contacts</li> <li>• Information providers</li> </ul>	✓	<ul style="list-style-type: none"> <li>• Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents.</li> </ul>	<ul style="list-style-type: none"> <li>• Common Purposes described below</li> </ul>
<b>Biometric Information</b>	X		X	• N/A	
<b>Internet/Network Information</b> , such as IP address, device and browser information, clickstream data, log data, and analytics data collected from, our website, fund data room, investor reporting portal and information you provide to us when you correspond with us in relation to inquiries.	✓	<ul style="list-style-type: none"> <li>• The browser or device of online visitors</li> </ul>	✓	<ul style="list-style-type: none"> <li>• Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents.</li> </ul>	<ul style="list-style-type: none"> <li>• Common Purposes described below</li> </ul>
<b>Geolocation Data</b> , such as your general geographic location or more precise location when permitted by law	✓	<ul style="list-style-type: none"> <li>• The browser or device of online visitors</li> </ul>	✓	<ul style="list-style-type: none"> <li>• consultants and other third-party service providers.</li> </ul>	<ul style="list-style-type: none"> <li>• Common Purposes described below</li> </ul>
<b>Sensory Information</b>	X		X	• N/A	
<b>Professional/Employment Information</b> , such as your employer, job title, job history, performance evaluations and	✓	<ul style="list-style-type: none"> <li>• Current and prospective investors</li> <li>• Individuals who</li> </ul>	✓	<ul style="list-style-type: none"> <li>• Administrators, auditors, law firms, consultants and placement</li> </ul>	<ul style="list-style-type: none"> <li>• Common Purposes described below</li> </ul>

Category of Personal Information	Collected	Categories of Sources	Disclosed	Category of Third-Party Recipients	Commercial or Business Purpose
compensation		contact us <ul style="list-style-type: none"> <li>• Industry contacts</li> <li>• Information providers</li> <li>• Publicly available sources</li> </ul>		agents.	
<b>Non-Public Education Information</b> (20 U.S.C. § 1232g, 34 C.F.R. Part 99) such as education records directly related to a student maintained by an educational institution or party acting on its behalf, such as grades, transcripts, class lists, student schedules, student identification codes, student financial information, or student disciplinary records.	✓	<ul style="list-style-type: none"> <li>• Individuals who contact us</li> <li>• Industry contacts</li> <li>• Publicly available sources</li> </ul>	✓	<ul style="list-style-type: none"> <li>• Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents.</li> </ul>	<ul style="list-style-type: none"> <li>• Common Purposes described below</li> </ul>
<b>Other Personal Information</b> , such as your net worth, and Personal Information you provide us in relation to a question, request, or inquiry	✓	<ul style="list-style-type: none"> <li>• Current and prospective investors</li> <li>• Individuals who contact us</li> <li>• Industry contacts</li> <li>• Information providers</li> </ul>	✓	<ul style="list-style-type: none"> <li>• Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents.</li> </ul>	<ul style="list-style-type: none"> <li>• Common Purposes described below</li> </ul>
<b>Sensitive Personal Information</b> (see further information on use of sensitive personal information below), such as social security, driver's license, state identification card, or passport numbers; account log-in, financial	✓, as to the following types of information: social security, driver's license, state identification	<ul style="list-style-type: none"> <li>• Current and prospective investors</li> </ul>	✓	<ul style="list-style-type: none"> <li>• Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory</li> </ul>	<ul style="list-style-type: none"> <li>• Common Purposes described below</li> </ul>

Category of Personal Information	Collected	Categories of Sources	Disclosed	Category of Third-Party Recipients	Commercial or Business Purpose
account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account; precise geolocation; racial or ethnic origin; religious or philosophical beliefs; union membership; genetic data; the contents of a consumer’s mail, email, and text messages unless you are the intended recipient of the communication; biometric information for the purpose of uniquely identifying a consumer; and personal information collected and analyzed concerning a consumer’s health, sex life, or sexual orientation.	care, or passport numbers, account log-in, financial account in combination with any required security or access code password, or credentials allowing access to an account only.			organizations, consultants and placement agents.	

**Collection and Use of Sensitive Personal Information**

We do not collect or use “sensitive personal” information other than:

- To perform services, or provide goods, as would reasonably be expected by an average consumer who requests those goods or services;
- As reasonably necessary and proportionate to detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted personal information;
- As reasonably necessary and proportionate to resist malicious, deceptive, fraudulent, or illegal actions directed at us and to prosecute those responsible for such actions;
- For short-term, transient use (but not in a manner that discloses such information to another third party or is used to build a profile of you or otherwise alter your experience outside of your current interaction with us);
- To perform services on behalf of our business;
- To verify or maintain the quality or safety of a service or to improve, upgrade, or enhance such service or device; and
- To collect or process sensitive personal information where such collection or processing is

not for the purpose of inferring characteristics about a consumer.

### **Common Purposes for Collecting Personal Information**

We may process or disclose the personal information we collect about you for one or more of the following business or commercial purposes:

- To facilitate our day-to-day business operations, including but not limited to: developing and monitoring private market investments, assisting investors in portfolio management and education, providing financial and accounting support, administering our Services, and providing tailored Services and information;
- The performance of our contractual and legal obligations (including applicable anti-money laundering, KYC and other related laws and regulations) in assessing an investor's suitability for investing in an investment vehicle;
- Ongoing communication with potential investors, their representatives, advisors and agents, (including the negotiation, preparation and signature of documentation) during the process of admitting potential investors to the relevant investment vehicle(s) and execution of related documentation (*e.g.*, the subscription agreement);
- The ongoing administrative, accounting, reporting and other processes and communication required to operate our business and/or the relevant investment vehicle;
- To administer, manage and set up an account(s) to allow a potential investor to purchase a holding or interest in the relevant investment vehicle(s);
- To facilitate the execution, continuation or termination of the contractual relationship between an investor and the relevant investment vehicle (as applicable);
- To facilitate the transfer of funds, and administering and facilitating any other transaction, between an investor and the relevant investment vehicle;
- To audit and perform verifications related to investor interactions, including but not limited to, verifying the quality and effectiveness of services and compliance;
- To evaluate and review our business performance, conducting data analytics, determining the effectiveness of our marketing activities, identifying usage trends;
- To maintain the safety, security and integrity of our products and services, databases, technology assets and business, including to detect security incidents, and protect against malicious, deceptive, fraudulent, or illegal activity;
- To enable any actual or proposed assignee or transferee of the investment vehicle (s), to evaluate proposed transactions;
- To facilitate investment transactions, including any business asset transactions involving the relevant investment vehicle;
- To enforce and carry out contracts and agreements;
- To fulfil any legal or regulatory requirement;
- Keeping investors informed about our business generally; and
- Any other purpose that has been notified, or has been agreed, in writing.

We retain the categories of personal information set forth above in the "Categories of Personal Information We Collect" section of these California Privacy Disclosures only as long as is reasonably necessary for those purposes set forth above, except as may be required under applicable

law, court order or government regulations.

### **Disclosure of Personal Information**

We do not share for the purpose of cross-context behavioral advertising or sell (as such terms are defined in the CCPA) any of the personal information we collect about you to third parties.

### **Your California Privacy Rights**

<b>Disclosure and Access Rights</b>	<p>You have the right to request that we disclose to you certain information regarding our collection, use, disclosure and sale of personal information specific to you over the last twelve (12) months. Such information includes:</p> <ul style="list-style-type: none"><li>• The specific pieces of personal information we have collected about you;</li><li>• The categories of personal information we have collected about you;</li><li>• The categories of sources of the personal information we have collected about you;</li><li>• The categories of third parties to whom we disclose the personal information;</li><li>• Whether we disclosed your personal information to a third party, and if so, the categories of personal information that each recipient obtained.; and</li><li>• The business or commercial purposes for collecting such personal information about you.</li></ul>
<b>Correction Right</b>	<p>You have the right to request that we correct any inaccuracies in the personal information that we retain, subject to certain statutory exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations. We will notify you in writing if we cannot comply with a specific request and provide an explanation of the reasons.</p>
<b>Right to Request Deletion</b>	<p>You have the right to request that we delete any of your personal information that we retain, subject to certain exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations. We will notify you in writing if we cannot comply with a specific request and provide an explanation of the reasons.</p>
<b>Right to Non-Discrimination</b>	<p>We will not discriminate against you for exercising your rights under the CCPA, including by denying service, suggesting that you will receive, or charging, different rates for services or suggesting that you will receive, or providing, a different level or quality of service to you.</p>

*However, please note that if the exercise of the rights described above limits our ability to process Personal Information (such as in the case of a deletion request), we may no longer be able to provide you our products or services or engage with you in the same manner.*

## **How to Exercise Your California Privacy Rights**

To exercise any of your rights under the CCPA, or to access this notice in an alternative format, please submit a request by:

- Emailing [notices@adamsstreetpartners.com](mailto:notices@adamsstreetpartners.com) with the subject line “California Privacy Rights Request,” or
- Calling us at 877-888-1555.

We will need to verify your identity before processing your request. In order to verify your identity, we will generally either require the successful login to your account or the matching of sufficient information you provide us to the information we maintain about you in our systems. You may designate an authorized agent to make a request under the CCPA on your behalf, provided that you provide a signed agreement verifying such authorized agent’s authority to make requests on your behalf, and we may verify such authorized person’s identity using the procedures above. If we request you verify your request and we do not receive your response, we will pause processing your request until such verification is received.

### **Contact Us**

If you have any questions or requests in connection with these California Privacy Disclosures or other privacy-related matters, please send an email to [notices@adamsstreetpartners.com](mailto:notices@adamsstreetpartners.com).

Alternatively, inquiries may be addressed to:

Adams Street Partners, LLC  
c/o Legal Department  
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Suite 2700  
Chicago, IL, USA 60606-2823