

CANADA PRIVACY DISCLOSURES

Last updated: March 2025

At Adams Street Canada Ltd. (referred to as “**Adams Street CA**,” “**we**,” “**us**,” or “**our**”), your privacy is very important to us. This Privacy Protection Policy (“**Canadian Privacy Policy**”) outlines how we collect, use, disclose, and protect your personal information when you interact with us. As a registered Exempt Market Dealer (“**EMD**”) with the Ontario Securities Commission (“**OSC**”), Adams Street CA adheres to the highest standards of privacy protection and compliance with applicable laws, including the *Personal Information Protection and Electronic Documents Act* (“**PIPEDA**”). In particular, individuals should also note that Adams Street CA is a wholly-owned subsidiary of Adams Street Partners, LLC and the provision of services to individuals may require, and/or result in, disclosure of personal information collected or processed by Adams Street CA to Adams Street Partners, LLC or its other subsidiaries or affiliates.

PIPEDA is Canada’s federal privacy law that governs how private sector organizations collect, use, and disclose personal information during commercial activities. PIPEDA applies to businesses across Canada, except in provinces with similar legislation, such as Alberta, British Columbia, and Quebec. Under PIPEDA, organizations must obtain consent for the collection of personal data, ensure that information is safeguarded, and provide individuals with the right to access and correct their personal information. The law aims to balance individuals’ privacy rights with organizations’ need to collect, use, and share personal data for legitimate business purposes.

“Personal Information” refers to any information about an identifiable individual. This includes, but is not limited to, information such as your name, contact details (e.g., email address, phone number), mailing address, financial information, government-issued identification numbers, date of birth, or any other data that can be used to identify you, either directly or indirectly. Personal Information also includes any opinions, preferences, and behaviors associated with an individual. In the context of PIPEDA, Personal Information does not include business contact information when used solely for communicating with an individual in relation to their employment, business, or profession.

Collection of Personal Information

We collect Personal Information that you voluntarily provide to us directly or through your dealings with Adams Street CA. Personal Information refers to information that can identify an individual or information about an identifiable individual. The types of Personal Information we collect include, but are not limited to:

- Name, contact details, and identification information (e.g., date of birth, Social Insurance Number);
- Financial details, including income, assets, and liabilities;
- Employment and occupation information;
- Investment objectives, risk tolerance, and financial goals;

- Tax residency and identification information (e.g., tax filings with the Canada Revenue Agency); and
- Any other information that may be required to comply with regulatory requirements or to facilitate your investment in exempt market products.

We may collect this information through account opening forms, investment agreements, due diligence processes, or as required under applicable securities and anti-money laundering regulations.

Use of your Personal Information

Adams Street CA uses your Personal Information to provide you with services, including those related to your investments (or prospective investments) and to ensure compliance with regulatory obligations. Specifically, we use your information for the following purposes:

- Verifying your identity and conducting due diligence as required by law;
- Assessing your suitability for specific investment products;
- Administering and managing your investments, including maintaining records and facilitating transactions;
- Communicating with you regarding your investments and our services (or the services of Adams Street Partners, LLC or its affiliates);
- Complying with legal and regulatory requirements, including reporting obligations under the OSC and anti-money laundering regulations; and
- Facilitating tax reporting and the fulfillment of our obligations to the Canada Revenue Agency (CRA).

Disclosure of your Personal Information in Compliance with Law

Adams Street CA may disclose your Personal Information when required to do so by law or when necessary to comply with our legal and regulatory obligations. This includes (but is not necessarily limited to) disclosure to:

- OSC;
- Financial Transactions and Reports Analysis Centre of Canada (FINTRAC);
- Canada Revenue Agency (CRA); and
- Other government authorities as required by law.

Third-Party Service Providers

As noted above, Adams Street CA is a wholly owned subsidiary of Adams Street Partners, LLC and any commingled funds, funds of one, separately managed accounts or other investment vehicles are managed and/or advised by, Adams Street Partners, LLC; therefore, in connection either with the services provided by Adams Street CA or the services provided by Adams Street Partners, LLC, we may also share your information with third parties such as compliance service providers, custodians of your assets, or legal and financial advisors, but only when necessary to fulfill our obligations to

you or as required under applicable laws.

Adams Street CA (and/or Adams Street Partners, LLC, as the case may be) works with trusted third-party service providers who assist us in delivering our services to you. This may include entities that provide us with technological support, fund administration, compliance services, and other essential functions. These third-party providers may have access to your Personal Information but only to the extent necessary to perform their services. All service providers are contractually obligated to maintain the confidentiality of your information and are prohibited from using your data for any other purpose.

International Data Transfers

Because Adams Street CA is a part of the Adams Street global organization, Personal Information may be transferred internationally to ensure efficient service delivery. When data is transferred outside of Canada, we ensure that appropriate safeguards are in place to protect the confidentiality and security of your information, in compliance with Canadian privacy laws and other applicable regulations.

Consent

We collect, use, and disclose your Personal Information either with your consent or as required and/or permitted by law. By providing us with your Personal Information or by engaging in financial transactions with Adams Street CA (or Adams Street Partners, LLC), you are deemed to consent to the collection, use, and disclosure of your Personal Information for the purposes outlined in this Canadian Privacy Policy, including to meet legal and regulatory obligations.

Consent for the collection, use, and disclosure of Personal Information may be express or implied, physical or electronic, given in writing, orally, or by toggling a check-off box, or by inference from the Individual's conduct, such as (without limitation) by use of our services or Adams Street Partners, LLC's website.

You may withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice. However, withdrawing your consent may limit our ability to provide services to you or to continue to manage your investments.

Protection of Personal Information

Adams Street CA takes appropriate measures to safeguard your Personal Information. We use physical, organizational, and technological measures to protect your information against unauthorized access, use, disclosure, alteration, or destruction. These measures include:

- Restricting access to Personal Information to authorized personnel;
- Secure electronic storage systems with encryption protocols; and
- Secure disposal of Personal Information that is no longer required for the purposes for which it was collected.

Retention of Personal Information

We retain Personal Information for as long as necessary to fulfill the purposes for which it was collected, to satisfy any legal, accounting, or reporting obligations, and to resolve disputes. When Personal Information is no longer needed, we securely destroy or anonymize it.

Access to and Correction of your Personal Information

You have the right to request access to the Personal Information we hold about you and to request corrections if you believe any information is inaccurate or incomplete. To make a request, please contact us at the contact information provided below.

We will respond to your request within a reasonable time frame and, where applicable, provide you with a copy of the information we hold about you. If you request a correction, we will update the information and notify any third parties to whom we have disclosed the inaccurate information.

Cookies

Our parent company's website uses cookies to enhance user experience, analyze website traffic, and personalize content. Cookies are small text files stored on your device when you visit a website. They help improve the functionality and performance of the website and provide us with information about how users interact with our site.

We use the following types of cookies:

- *Essential Cookies*: These cookies are necessary for the website to function and cannot be switched off in Adams Street's systems. They are usually set in response to actions you take, such as setting your privacy preferences or filling out forms.
- *Analytical/Performance Cookies*: These cookies allow us to collect data on how visitors use our website, such as which pages are visited most often and how users navigate through the site. This helps us improve website performance and usability.
- *Functional Cookies*: These cookies enable the website to provide enhanced functionality and personalization, such as remembering your preferences on future visits.
- *Advertising/Marketing Cookies*: We may use cookies to display ads relevant to your interests, measure the effectiveness of ad campaigns, or limit the number of times you see an advertisement.

You can control and manage cookies through your browser settings. Most browsers allow you to refuse cookies or notify you when a cookie is being stored. Please note that blocking or disabling certain types of cookies may impact your user experience and restrict access to certain features on the Adams Street website.

Changes to the Canadian Privacy Policy

We reserve the right to modify this Canadian Privacy Policy at any time. Any changes will be effective when the updated policy is posted on our website. Your continued use of our services after such updates constitutes your agreement to the updated policy.

Complaints

If you have any questions or concerns about our handling of your personal information, or if you believe we are not in compliance with our obligations under PIPEDA or any other applicable privacy legislation, you have the right to file a complaint.

Steps to File a Complaint Related to Use of Your Personal Information:

1. **Contact Us Directly:** In the first instance, we encourage you to contact us to resolve any concerns. Please send your complaint or inquiry in writing to our Privacy Officer at the contact information provided below.

Privacy Officer: Adams Street Partners, LLC Chief Compliance Officer.

Email: notices@adamsstreetpartners.com

Phone: 312-553-7890

Address: Adams Street Partners, LLC
c/o Chief Compliance Officer
One North Wacker Dr
Suite 2700
Chicago, IL 60606

2. **Escalate to the Office of the Privacy Commissioner of Canada:** If you are not satisfied with our response, or if you feel that we have not addressed your concerns adequately, you may file a complaint with the Office of the Privacy Commissioner of Canada. The Commissioner's office can be reached through the following:

Office of the Privacy Commissioner of Canada

Website: <https://www.priv.gc.ca>

Toll-Free: 1-800-282-1376

TTY: 819-994-6591

We take privacy matters seriously and will work to resolve any issues in a timely and transparent manner.

Contact Us

If you have any questions or concerns about this Canadian Privacy Policy or wish to request access to or correction of your Personal Information, please contact us at:

Adams Street Canada Ltd.

Email: notices@adamsstreetpartners.com

Attention: Canadian Privacy Officer