

EEA-UK PRIVACY DISCLOSURES

Last updated: March 2025

Prior versions of these EEA-UK Privacy Disclosures are available upon request.

Unless otherwise expressly stated, capitalized terms used in these EEA-UK Privacy Disclosures have the same meaning as defined in the Adams Street Partners, LLC Privacy Notice, or (to the extent relevant) any applicable (i) subscription agreement provided to and/or entered into by an investor or (ii) limited partnership agreement.

Scope of Disclosures

These EEA-UK Privacy Disclosures apply to the extent that EEA-UK Data Privacy Legislation (as defined below) applies to our processing of Personal Data by an Authorized Entity (each as defined below). If these EEA-UK Privacy Disclosures apply, the relevant data subject has certain rights with respect to such processing of their Personal Data, as outlined below.

For these EEA-UK Privacy Disclosures, “EEA-UK Data Protection Legislation” means all applicable legislation and regulations relating to the protection and/or processing of Personal Data in force from time to time in the European Union (the “EU”), the European Economic Area (the “EEA”) and/or the United Kingdom (the “UK”) including, as applicable, the following: (a) Regulation (EU) 2016/679 (the “EU GDPR”); (b) the EU GDPR as it forms part of the laws of England and Wales, Scotland and Northern Ireland by virtue of section 3 of the European Union Withdrawal Act 2018 (the “UK GDPR”); (c) any other legislation which implements any other current or future legal act of the EU, EEA or the UK concerning the protection and/or processing of Personal Data (including any other national implementing or successor legislation); and (d) any amendment or re-enactment of any of the foregoing.

The terms “controller”, “processor”, “data subject”, “Personal Data” and “processing” in these EEA-UK Privacy Disclosures shall have the meanings given to them under the applicable EEA-UK Data Protection Legislation.

Please contact notices@adamsstreetpartners.com with any questions related to these EEA-UK Privacy Disclosures.

Sources of Personal Data Collected

In connection with the formation, offering and operation of private investment funds for investors, Adams Street Partners, LLC, Adams Street (Europe) GmbH and Adams Street Partners UK LLP, their respective affiliates and in each case, their respective administrators, legal and other advisors, service providers and agents (the “Authorized Entities”) may collect, record, store, adapt, and otherwise process and use Personal Data, either relating to (i) investors or to their partners, officers, directors, employees, shareholders, ultimate beneficial owners or affiliates or (ii) to any other data subjects with whom the Authorized Entities interact (collectively, “data subjects”). Such Personal Data may be collected from the following sources:

- (1) information received in telephone meetings, conversations, in voicemails, through written correspondence, via e-mail or other forms of communications or in subscription agreements, investor questionnaires, applications or other forms (including, without limitation, any anti-money laundering, “know-your-client” identification, and verification documentation);
- (2) information about transactions with any Authorized Entity or other persons;
- (3) information captured on any Authorized Entity’s website, fund data room and/or investor reporting portal (as applicable) including registration information, information provided through online forms or any information captured via “cookies” and/or similar technologies;
- (4) information containing photographic image or specimen handwriting; and
- (5) information from available public sources, including from:
 - (a) publicly available and accessible directories and sources;
 - (b) bankruptcy registers;
 - (c) tax authorities, including those that are based outside the UK and the EEA if the applicable data subject is subject to tax in another jurisdiction;
 - (d) governmental and competent regulatory authorities to whom any Authorized Entity has regulatory obligations;
 - (e) credit agencies; and
 - (f) fraud prevention and detection agencies and organizations.

As part of its compliance with legal obligations such as anti-money laundering requirements, the Authorized Entities may be required to process special categories of Personal Data (as defined in the EEA-UK Data Protection Legislation), including Personal Data relating to political opinions as well as criminal convictions and offences data.

Any Authorized Entity may, in certain circumstances, combine Personal Data it receives from a data subject with information that it collects from, or about such data subject. This will include information collected in an online or offline context. Personal Data of data subjects may be processed and controlled irrespective of whether such data subject is admitted to an investment vehicle as a limited partner.

One or more of the Authorized Entities are “controllers” of Personal Data collected in connection with the investment vehicle. In simple terms, this means such Authorized Entities: (i) “control” the Personal Data that they or other Authorized Entities collect from data subjects or other sources; and (ii) make certain decisions on how to use and protect such Personal Data.

Categories of Personal Data and Legal Bases for Processing

Any Authorized Entity may process the following categories of Personal Data (whether it is

obtained from you or a third party) on the following legal bases:

Current and Prospective Investors

Category of Personal Data	How We Use the Personal Data	Legal Bases for Processing
Contact Information	<ul style="list-style-type: none"> ▪ Provide investors with information about our firm, their investment, and provide our Services; ▪ Facilitate investment transactions; ▪ Respond to inquiries and questions and provide support; ▪ Business development purposes and customer relationship management; ▪ Perform due diligence in compliance with “Know Your Customer” and anti-money laundering laws and regulations. 	<ul style="list-style-type: none"> ▪ Performance of contract; ▪ Legitimate interest, namely for customer management and marketing purposes; and ▪ Compliance with legal obligations.
Investment Information	<ul style="list-style-type: none"> ▪ Provide investors with information about our firm, their investment, and our Services; ▪ Facilitate investment transactions; ▪ Perform due diligence in compliance with “Know Your Customer” and anti-money laundering laws and regulations. 	<ul style="list-style-type: none"> ▪ Performance of contract; ▪ Legitimate interest, namely for customer management; and ▪ Compliance with legal obligations.
Professional/Employment Information	<ul style="list-style-type: none"> ▪ Provide investors with information about our firm, their investment, and our Services; ▪ Perform due diligence in compliance with “Know Your Customer” and anti-money laundering laws and regulations. 	<ul style="list-style-type: none"> ▪ Performance of contract; ▪ Legitimate interest, namely for customer management purposes; and ▪ Compliance with legal obligations.
Diligence Information	<ul style="list-style-type: none"> ▪ Perform due diligence in compliance with “Know Your Customer” and anti-money laundering laws and regulations. 	<ul style="list-style-type: none"> ▪ Compliance with legal obligations.
Automatically gathered Information	<ul style="list-style-type: none"> ▪ Provide Services; ▪ Conduct business development including marketing and business analysis purposes as well as customer relationship management. 	<ul style="list-style-type: none"> ▪ Performance of contract ▪ Legitimate interest, namely to facilitate our day-to-day business as set out in our Privacy Notice, prevent, investigate, or provide notice of fraud or unlawful or criminal activity, enforce and defend against claims, develop new investment strategies and improve our investment offerings;

Category of Personal Data	How We Use the Personal Data	Legal Bases for Processing
		<ul style="list-style-type: none"> ▪ Compliance with legal obligations.
Investor Registration and Log-In Information	<ul style="list-style-type: none"> ▪ Provide Services; ▪ Facilitate day-to-day business operations as set out in our Privacy Notice; ▪ Develop new investment strategies. 	<ul style="list-style-type: none"> ▪ Performance of contract; and ▪ Legitimate interest, namely customer relationship management, to facilitate our day-to-day business as set out in our Privacy Notice and develop new investment strategies.
Information we obtain when communicating	<ul style="list-style-type: none"> ▪ Provide services; ▪ Maintain customer relationship; and ▪ Develop new investment strategies and improve our investment offerings. 	<ul style="list-style-type: none"> ▪ Performance of contract; and ▪ Legitimate interest, namely respond to inquiries and questions and provide support.
Publicly available information	<ul style="list-style-type: none"> ▪ Conduct due diligence and risk management relating to our engagement with the investors, private equity fund or portfolio company they represent or invest in. 	<ul style="list-style-type: none"> ▪ Performance of contract; ▪ Legitimate interest, namely to assess our investment; and ▪ Compliance with legal obligations.

Representatives of Private Equity Funds and Portfolio Companies

Category of Personal Data	How We Use the Personal Data	Legal Bases for Processing
Contact Information	<ul style="list-style-type: none"> ▪ Inform our decisions to invest in the private equity fund or portfolio company they represent or invest in; ▪ Conduct due diligence and risk management relating to our engagement with the private equity fund or portfolio company they represent or invest in; ▪ Communicate with them regarding current or prospective investments in the private equity fund or portfolio company they represent or invest in; ▪ Facilitate and maintain our relationship with the private equity fund or portfolio company they represent or invest in, such as addressing contract amendments, consents, occasional inquiries, securities filings, and portfolio company board activities. 	<ul style="list-style-type: none"> ▪ Performance of contract; ▪ Legitimate interest, namely pursue our business objectives and assess our investments, and customer relationship management; and ▪ Compliance with legal obligations.

Category of Personal Data	How We Use the Personal Data	Legal Bases for Processing
Professional/Employment Information	<ul style="list-style-type: none"> ▪ Communicate with them regarding current or prospective investments in the private equity fund or portfolio company they represent or invest in; ▪ Conduct due diligence and risk management relating to our engagement with the private equity fund or portfolio company they represent or invest in. 	<ul style="list-style-type: none"> ▪ Performance of contract; ▪ Legitimate interest, namely pursue our business objectives and assess our investments, and customer relationship management; and ▪ Compliance with legal obligations.
Diligence Information	<ul style="list-style-type: none"> ▪ Communicate with them regarding current or prospective investments in the private equity fund or portfolio company they represent or invest in; ▪ Conduct due diligence and risk management relating to our engagement with the private equity fund or portfolio company they represent or invest in. 	<ul style="list-style-type: none"> ▪ Performance of contract; ▪ Legitimate interest, namely pursue our business objectives and assess our investments, and customer relationship management; and ▪ Compliance with legal obligations.

Representatives of Current and Prospective Vendors and Business Partners

Category of Personal Data	How We Use the Personal Data	Legal Bases for Processing
Contact Information	<ul style="list-style-type: none"> ▪ Obtain a vendor’s goods or services; ▪ Facilitate and maintain our relationship with the vendor or business partner; and ▪ Send email communications about upcoming client conferences. 	<ul style="list-style-type: none"> ▪ Performance of contract; and ▪ Legitimate interest, namely maintaining the business relationship and marketing.
Professional/Employment Information	<ul style="list-style-type: none"> ▪ Obtain a vendor’s goods or services; ▪ Facilitate and maintain our relationship with the vendor or business partner; and ▪ Send email communications about upcoming client conferences. 	<ul style="list-style-type: none"> ▪ Performance of contract; and ▪ Legitimate interest, namely maintaining the business relationship and marketing.

Other Collection of Personal Information

Category of Personal Data	How We Use the Personal Data	Legal Bases for Processing
Contact Information	<ul style="list-style-type: none"> ▪ Provide services; ▪ Respond to inquiries and questions and provide support; ▪ For business development purposes and customer relationship management. 	<ul style="list-style-type: none"> ▪ Performance of contract; and ▪ Legitimate interest, namely to respond to inquiries and questions and provide support, to facilitate our day-to-day business as set out in our Privacy Notice, prevent, investigate, or provide notice of fraud or unlawful or criminal activity, enforce and defend against claims.
Automatically gathered information	<ul style="list-style-type: none"> ▪ Provide services; 	<ul style="list-style-type: none"> ▪ Performance of contract;

Category of Personal Data	How We Use the Personal Data	Legal Bases for Processing
	<ul style="list-style-type: none"> ▪ For business development including marketing and business analysis purposes as well as customer relationship management. 	<ul style="list-style-type: none"> ▪ Legitimate interest, namely to facilitate our day-to-day business as set out in our Privacy Notice, prevent, investigate, or provide notice of fraud or unlawful or criminal activity, enforce and defend against claims, develop new investment strategies and improve our investment offerings; and ▪ Compliance with legal obligations.
Information we obtain when communicating	<ul style="list-style-type: none"> ▪ Provide services; ▪ For customer relationship management; ▪ Develop new investment strategies and improve our investment offerings. 	<ul style="list-style-type: none"> ▪ Performance of contract; and ▪ Legitimate interest, namely respond to inquiries and questions and provide support.
Publicly available information	<ul style="list-style-type: none"> ▪ Conduct due diligence and risk management relating to our engagement with the investors, private equity fund or portfolio company they represent or invest in. 	<ul style="list-style-type: none"> ▪ Performance of contract; ▪ Legitimate interest, namely to assess our investment; and ▪ Compliance with legal obligations.

As disclosed in our Compliance Manual, Adams Street and its affiliates retain and monitor electronic communications, including email messages, text messages, instant messages and other communications sent from an Adams Street account or using an Adams Street device. Such monitoring is conducted for a variety of reasons including (but not limited to): pursuant to legal obligations with the US Securities and Exchange Commission related to business records, ensuring compliance with insider trading policies, protection of business interests, and system security. However, the retention and monitoring of such communications can raise additional privacy concerns, including with respect to Personal Data.

There is a need to process Personal Data for the purposes set out in these EEA-UK Privacy Disclosures as a matter of contractual necessity under or in connection with any relevant limited partnership agreement, subscription agreement and associated documentation, pursuant to applicable legal obligations, and in the legitimate interests of the Authorized Entities (or those of a third party) to operate their respective businesses. From time to time, an Authorized Entity may need to process the Personal Data on other legal bases.

A failure to provide the Personal Data requested to fulfil the purposes described in these EEA-UK Privacy Disclosures may result in the applicable Authorized Entities being unable to provide the Services, including in connection with any relevant limited partnership agreement and/or subscription agreement.

Sharing and Transfers of Personal Data

In addition to disclosing Personal Data amongst themselves, any Authorized Entity may disclose

personal data, where permitted by EEA-UK Data Protection Legislation, to other service providers, investors, employees, agents, contractors, consultants, professional advisors, lenders, data processors and persons employed and/or retained by them including those identified in the “Our Disclosure of Personal Information” section of the Privacy Notice in order to fulfil the purposes described in these EEA-UK Privacy Disclosures and any third party that acquires, or is interested in acquiring or securitizing, all or part of the investment vehicle’s assets or interests, or that succeeds to it in carrying on all or a part of its businesses, or services provided to it, whether by merger, acquisition, reorganization or otherwise. In addition, any Authorized Entity may share Personal Data with regulatory bodies having competent jurisdiction over them, tax authorities, auditors and tax advisors (where necessary or required by law).

We may transfer Personal Data about you to countries that the European Commission has deemed to adequately safeguard Personal Data.

Additionally, any Authorized Entity may transfer to, store or process Personal Data in a Non-Equivalent Country (as defined below), in order to fulfil the purposes described in these EEA-UK Privacy Disclosures and in accordance with applicable law, rule or regulation, including where such transfer is a matter of contractual necessity to enter into, perform and administer any relevant subscription agreement and/or the limited partnership agreement, and to implement requested pre-contractual measures. For information on the safeguards applied to such transfers, please contact Adams Street. For the purposes of these EEA-UK Privacy Disclosures, “**Non-Equivalent Country**” shall mean a country or territory other than (i) a member state of the EEA; (ii) the UK; or (iii) a country or territory which has at the relevant time been decided by applicable authority, including the European Commission or the Government of the UK and/or the UK Information Commissioner’s Office (as applicable) in accordance with EEA-UK Data Protection Legislation to ensure an adequate level of protection for Personal Data.

Standard Contractual Clauses

Pursuant to Standard Contractual Clauses adopted by relevant regulatory authorities, which provide safeguards for Personal Data transferred outside of the EEA or UK. We may use these Standard Contractual Clauses when transferring Personal Data from a country in the EEA or UK to a country outside the EEA or UK that has not been deemed to adequately safeguard Personal Data. You can request a copy of our Standard Contractual Clauses by contacting us as set forth in the Contact Us section below.

Data Retention

Adams Street and its affiliates consider the protection of Personal Data to be a sound business practice, and to that end, employ appropriate technical and organizational measures, including robust physical, electronic and procedural safeguards to protect personal data in their possession or under their control.

We retain Personal Data for as long as is necessary for the purposes set out in these EEA-UK Privacy Disclosures, unless a longer period is required under applicable law or is needed to resolve disputes or protect our legal rights.

The criteria used to determine the period for which Personal Data will be retained varies depending on the legal basis under which we process the Personal Data, but follows the general guidelines described below:

Legitimate Interests	Where we are processing Personal Data based on our legitimate interests, we generally will retain such information for a reasonable period of time based on the particular interest, taking into account the fundamental interests and the rights and freedoms of data subjects, but no longer than necessary for the purpose for which we process your personal data.
Consent	Where we are processing Personal Data based on your consent, we generally will retain the information for the period of time necessary to fulfill the underlying agreement with you or until you withdraw your consent.
Contract	Where we are processing Personal Data based on contract, we generally will retain the information for the duration of the contract plus some additional limited period of time that is necessary to comply with law or that represents the statute of limitations for legal claims that could arise from the contractual relationship.
Legal Obligation	Where we are processing Personal Data based on a legal obligation, we generally will retain the information for the period of time necessary to fulfill the legal obligation.
Legal Claim	We may need to apply a “legal hold” that retains information beyond our typical retention period where we face threat of legal claim. In that case, we will retain the information until the hold is removed, which typically means the claim or threat of claim has been resolved.

Personal Data will be retained throughout the life cycle of any investment in the investment vehicle. However, some Personal Data will be retained after a data subject ceases to be an investor in the investment vehicle and apply the same policies that apply to current investors. In all cases, in addition to the purposes and legal bases, we consider the amount, nature and sensitivity of the Personal Data, as well as the potential risk of harm from unauthorized use or disclosure of your Personal Data.

Data Subject Rights

It is acknowledged that, subject to applicable EEA-UK Data Protection Legislation, investors or the data subjects to which Personal Data relates, have certain rights under EEA-UK Data Protection Legislation, including the following (subject to certain limitations at law):

Access	The right to access Personal Data about you, as well as obtain further information relating to its processing.
Rectification	The right to correct or update any Personal Data about you that is inaccurate or incomplete.
Restriction of Processing	The right to require us to limit the purposes for which we process your Personal Data if the continued processing of the

	Personal Data in this way is not justified, such as where the accuracy of the Personal Data is contested by you.
Erasure	The right to request the erasure of Personal Data about you without undue delay if the continued processing of that Personal Data is not justified.
Portability	The right to obtain a copy of Personal Data about you in an easily accessible format and the right to have that data transmitted to another controller.
Objection to Processing	You also have the right to object to any processing based on our legitimate interests where there are grounds relating to your particular situation. There may be compelling reasons for continuing to process your Personal Data, and we will assess and inform you if that is the case. You can object to marketing activities for any reason.

Please note that if the exercise of these rights limits our ability to process Personal Data, we may not be able to provide our products or Services to you, or otherwise engage with you going forward.

Right to Withdraw Consent

Where we rely on your consent for processing of your Personal Data, you also have the right to withdraw your consent to such processing at any time and with effect for the future, subject to certain limitations at law.

You may withdraw your consent by contacting us as set forth in the “Contact Us” section below or where we send marketing communication to you, you may unsubscribe from such communication using the means provided for in each such communication.

Submitting Requests

To submit a request, please contact us as set forth in the “Contact Us“ section below. We may need to verify your identity before processing your request, which may require us to obtain additional Personal Data from you. In certain circumstances, we may decline a request to exercise the rights described above.

Right to Erasure

Please note that the right to erasure is not absolute and it may not always be possible to erase Personal Data on request, including where the Personal Data must be retained to comply with a legal obligation.

In addition, erasure of the Personal Data requested to fulfil the purposes described in these EEA-UK Privacy Disclosures may result in the inability to provide the services required in connection with relevant limited partnership agreements and/or the subscription agreement.

Right to Lodge a Complaint

If you have any complaints regarding our privacy practices, you have the right to lodge a complaint

with a data protection authority (*i.e.*, supervisory authority).

Updates to These EEA-UK Privacy Disclosures

We may update these EEA-UK Privacy Disclosures from time to time.

When we make changes to these EEA-UK Privacy Disclosures, we will change the “Last Updated” date, and if we make material changes, we will notify you by email to your registered email address, by prominently posting on our website, or through other appropriate communication channels. All changes shall be effective from the date of publication unless otherwise provided in the notification.

Contact Us

If you have any questions or requests in connection with these EEA-UK Privacy Disclosures or other privacy-related matters, please send an email to: notices@adamsstreetpartners.com.

Alternatively, inquiries may be addressed to:

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