

ADGM PRIVACY DISCLOSURES

Last updated: May 2026

These ADGM Privacy Disclosures supplement the Adams Street Partners Privacy Notice (the “**Privacy Notice**”) and apply to the extent that the processing of Personal Data is subject to the Abu Dhabi Global Market Data Protection Regulations 2021 (“**DPR**”).

For the purposes of these ADGM Privacy Disclosures, Adams Street ME Ltd shall be referred to as the “**Firm**”.

Unless otherwise defined in these ADGM Privacy Disclosures, capitalized terms shall have the meaning given to them in the Privacy Notice and associated disclosures.

For the purposes of these ADGM Privacy Disclosures, the terms “Controller,” “Processor,” “Personal Data,” “Sensitive Personal Data,” “Data Subject,” and “Processing” shall have the meanings given under the DPR.

Scope of these ADGM Privacy Disclosures

These ADGM Privacy Disclosures apply to the Processing of Personal Data by the relevant ADGM-established entity and its affiliates, administrators, advisers, service providers, agents, and delegated third parties solely in connection with services provided to the Firm related to:

- investor onboarding and relationship management;
- regulatory compliance obligations;
- anti-money laundering, sanctions screening, and due diligence activities;
- investment management and operational activities;
- vendor and service provider management; and
- business development and relationship management activities.

Categories of Personal Data Processed

The categories of Personal Data processed may include:

- identification and contact information;
- investor and transaction information;
- professional and employment information;
- due diligence and verification documentation;
- financial and tax-related information;
- electronic communications and correspondence;
- system usage, portal, and log-in information;
- publicly available information; and
- any other information reasonably required to facilitate the relevant business relationship or

comply with applicable legal and regulatory obligations.

Where required for regulatory compliance purposes, the Firm may also process Sensitive Personal Data, including information relating to criminal convictions and offences, politically exposed person screening, sanctions screening, anti-money laundering checks, and other legally required verification activities.

Legal Bases for Processing

Personal Data may be Processed where necessary for:

- the performance of a contract or steps prior to entering into a contract;
- compliance with legal and regulatory obligations;
- the legitimate interests pursued by the Firm or a third party, including operational, administrative, security, governance, risk management, and business development purposes;
- the establishment, exercise, or defense of legal claims; or
- consent, where consent is required under applicable law.

International Transfers of Personal Data

Personal Data may be transferred to, stored in, or accessed from jurisdictions outside ADGM where necessary for the purposes described in the Privacy Notice and these ADGM Privacy Disclosures.

Where Personal Data is transferred outside ADGM to a jurisdiction that is not recognized by the ADGM Office of Data Protection as providing an adequate level of protection, appropriate safeguards will be implemented in accordance with the DPR. Such safeguards may include:

- ADGM Standard Contractual Clauses;
- intra-group data transfer arrangements;
- contractual safeguards with service providers; or
- other lawful transfer mechanisms recognized under the DPR.

Retention of Personal Data

Personal Data will be retained for as long as reasonably necessary to fulfil the purposes described in the Privacy Notice and these ADGM Privacy Disclosures, including to:

- comply with legal, regulatory, tax, accounting, and reporting obligations;
- maintain records relating to investments and investor relationships;
- respond to regulatory requests and investigations;
- establish, exercise, or defend legal claims; and
- enforce contractual rights and obligations.

Retention periods may be extended where required by applicable law or regulatory requirements.

Data Subject Rights

Subject to the DPR and applicable limitations, Data Subjects may have the right to:

- request access to Personal Data;
- request correction of inaccurate or incomplete Personal Data;
- request erasure of Personal Data;
- request restriction of Processing;
- object to certain Processing activities;
- request portability of Personal Data;
- withdraw consent where Processing is based on consent; and
- object to certain automated decision-making activities, where applicable.

Requests may be submitted using the contact details below. The Firm may request additional information to verify identity before responding to a request.

Security and Breach Management

The Firm implements appropriate technical and organizational measures designed to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access.

Personal Data breaches will be assessed in accordance with the DPR and, where required, notified to the ADGM Commissioner of Data Protection and affected individuals within the applicable regulatory timeframes.

Complaints

Data Subjects have the right to lodge a complaint with the ADGM Office of Data Protection where they believe that the Processing of their Personal Data infringes the DPR.

Contact Details

Questions, requests, or complaints relating to these ADGM Privacy Disclosures or the Processing of Personal Data under the DPR may be directed to:

Email: notices@adamsstreetpartners.com

Address:

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