

CAYMAN ISLANDS PRIVACY DISCLOSURES

FOR OUR INVESTORS IN CAYMAN ISLANDS ENTITIES

Last updated: January 2020

Scope of Disclosures

These Cayman Islands Privacy Disclosures (the “**Cayman Disclosures**”) supplement the information contained in our Privacy Notice, but unlike the Privacy Notice, these Cayman Disclosures are made by, and on behalf of, each of our Cayman Islands entities.

Introduction

The purpose of these Cayman Disclosures is to provide you with information on our use of your Personal Data in accordance with the Data Protection Law, 2017 of the Cayman Islands (the “**DPL**”). In these Cayman Disclosures, “we”, “us” and “our” refers to Adams Street Partners, LLC, entities domiciled in the Cayman Islands for which Adams Street Partners, LLC or one of its affiliates serves as general partner or investment manager, the general partner and/or investment manager of each such entity and its or their affiliates and/or delegates.

Investor Data

By virtue of making an investment in any of our Cayman Islands entities and your associated interactions with us (including any subscription, capital commitment and/or capital contribution, whether past, present or future) or by virtue of you otherwise providing us with personal information on individuals connected with you as an investor (for example your directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners or agents), you will provide us with certain personal information which constitutes Personal Data within the meaning of the DPL (“**Investor Data**”). We may also obtain Investor Data from other public sources. Investor Data includes, without limitation, the following information relating to you and/or any individuals connected with you as an investor: name, residential address, email address, contact details, corporate contact information, signature, nationality, place of birth, date of birth, tax identification, credit history, correspondence records, passport number, bank account details, source of funds details and details relating to your investment activity.

In our use of Investor Data, the Cayman Islands entity will be characterized as a “data controller” for the purposes of the DPL. The Cayman Islands entity’s affiliates, delegates and service providers may act as “data processors” for the purposes of the DPL.

Who this Affects

If you are a natural person, this will affect you directly. If you are a corporate entity (including, for these purposes, legal arrangements such as trusts, partnerships or limited partnerships) that provides us with Investor Data on individuals connected to you for any reason in connection with your relationship with us, this will be relevant for those individuals and you should transmit this

document to such individuals or otherwise advise them of its content.

How We May Use Your Investor Data

Each Cayman Islands entity, as the data controller, may collect, store and use Investor Data for lawful purposes, including, in particular:

- i. where this is necessary for the performance of our rights and obligations under the constitutional and operational documents of our entity (together with any subscription agreement or other contract to which you and we are a party);
- ii. where this is necessary for compliance with a legal or regulatory obligation to which we are subject (such as compliance with anti-money laundering or FATCA/CRS requirements); and/or
- iii. where this is necessary for the purposes of our legitimate interests and such interests are not overridden by your interests, fundamental rights or freedoms.

Additionally, any of the Cayman Islands entities' affiliates and/or delegates and/or appointed service providers (the "**Delegates**") may use Investor Data, for example to provide its services to us or to discharge the legal or regulatory requirements that apply directly to it or in respect of which we rely upon the Delegates, but such use of Investor Data by a Delegate will always be compatible with at least one of the aforementioned purposes for which we process Investor Data.

Should we wish to use Investor Data for other specific purposes (including, if applicable, any purpose that requires your consent), we will contact you.

Why We May Transfer Your Investor Data

In certain circumstances we and/or our Delegates may be legally obliged to share Investor Data and other information with respect to your interest in a Cayman Islands entity with the relevant regulatory authorities such as the Cayman Islands Monetary Authority or the Tax Information Authority. They, in turn, may exchange this information with foreign authorities, including tax authorities.

We may disclose Investor Data to carry out and implement any and all purposes and objects of our Cayman Islands entity, including: (i) to our Delegates, custodians, banks, financing parties, broker-dealers, accountants, auditors and lawyers, who will either process Investor Data on our behalf or may be data controllers in their own right; (ii) to regulatory, administrative, law enforcement agencies, ombudsmen or other oversight bodies; (iii) to any third party that acquires, or is interested in acquiring, all or a substantial part of our assets or equity interests, or that succeeds our investment manager or general partner in carrying on all or a part of our business; (iv) as required or permitted by law or regulation, including to comply with a subpoena or similar legal process; (v) when we believe in good faith that disclosure is legally required; or (vi) when we have a legitimate interest in making a disclosure and such interests are not overridden by your interests, fundamental rights or freedoms, such as where necessary to protect our investment manager, our general partner or our entity's rights and property. This may include certain entities located outside the Cayman Islands

or the European Economic Area.

The Data Protection Measures We Take

Any transfer of Investor Data by us or our duly authorized Delegates outside of the Cayman Islands shall be in accordance with the requirements of the DPL.

We and our duly authorized Delegates shall apply technical and organizational information security measures to protect against unauthorized or unlawful processing of Investor Data, and against accidental loss or destruction of, or damage to, Investor Data.

We shall notify you of any Investor Data breach that is reasonably likely to result in a risk to the interests, fundamental rights or freedoms of either you or those data subjects to whom the relevant Investor Data relates.