

## **PRIVACY NOTICE**

This Privacy Notice summarizes the policies of Ivy Co-Invest Vehicle II LLC and Ivy UK Co-Invest Vehicle II Limited (together, “Ivy” or “we”) with respect to personal information of the following who are natural persons that we process in connection with investments in an Ivy entity: (i) existing and prospective investors, (ii) the authorised signatories, principals, beneficial owners, trustees and beneficiaries of institutional investors, (iii) representatives of clients, investors and other businesses that we interact with; and (iv) other individuals whose personal information is provided to us in connection with Ivy (the “Data Subjects”). This Privacy Notice sets out the kinds of personal information we collect and how that personal information is used. Please read the following carefully to understand our views and practices regarding Data Subjects’ personal information and how we will treat it. References to “we,” “us,” “our” and other similar pronouns in this Privacy Notice refer to us and our affiliates. Each investor or prospective investor which is not a natural person should provide this notice to each Data Subject falling within (ii) or (iii) above.

### **Personal Information Collected**

We receive personal information relating to Data Subjects which includes:

- *Category 1* – Contact information, such as name, title, address, business and/or personal telephone number, and business and/or personal email address.
- *Category 2* – Verification information, such as passport, driving licence, other government issued photo identification card, utility bill, credit or bank card statement, wire transfer information, and country of residence, country of origin/nationality, country of domicile/tax residency, tax reference number, date of birth, and occupation, information relating to politically exposed persons and foreign political figures.
- *Category 3* – Finance-related information, such as assets, capital commitments, and name of the organisation the Data Subject works for and/or is a controlling person for.
- *Category 4* – Work contact information, such as name, title, name of the business the Data Subject works for, business address, business telephone number, and business email address.
- *Category 5* – Data gathered by our website(s) visited by Data Subjects (such as our investor portal) that pertains to Data Subjects’ usage of such website(s).

The personal information is collected directly from Data Subjects or from existing and prospective investors. We may also receive personal information regarding Data Subjects from certain service providers (including, without limitation, placement agents, finders and consultants) and from other publicly available sources.

## **Purposes for Processing Personal Information**

We use the personal information held about Data Subjects for the following purposes:

- *Categories 1, 4 and 5* – To carry out our obligations arising from the subscription agreement or any other agreement entered into by Data Subjects, or investors with which Data Subjects are connected, in connection with an investment in Ivy (“Governing Agreements”), including to contact such Data Subjects (including with information or messages about an investment in Ivy), to process and administer investments and for administrative purposes.
- *Categories 2 and 3* – To determine eligibility to invest in Ivy and/or account, to complete “know your client” and anti-money laundering checks, credit checks and other checks as are required by law and as described in the Governing Agreements, which, if not conducted, means that we may be unable to carry out our obligations arising under any agreement and/or applicable law.
- *Category 3* – To provide our advice and services to Data Subjects, or investors with which Data Subjects are connected.
- *Category 4* – To communicate with our institutional clients, investors and other businesses through their natural person representatives.

In addition, we may process Data Subjects’ personal information in any of the categories for the following further reasons: (i) to exercise and comply with rights and obligations at law or under regulation, or under contract, including for the establishment, exercise or defense of legal claims by or against it; (ii) to manage and administer our business and to improve relationships with investors and assist with investor relationship management, and for marketing and business development activities and analysis; (iii) to help detect, prevent, investigate, and prosecute fraud and/or other criminal activity; (iv) to manage our information technology and to ensure the security of our systems; (v) to disclose information to a governmental, tax or regulatory body, financial market, broker or other intermediaries, counterparties, court, auditors or other third parties and to conduct compliance activities when we think this is in our, or someone else’s legitimate interests; and (vi) to investigate and respond to any complaints or any incidents relating to us.

## **Lawful Basis under Regulation (EU) 2016/679 (“GDPR”) the UK Data Protection Act 2018 (“DPA”) and the UK GDPR (as defined in the DPA) for Processing Personal Information**

The lawful basis/bases that we rely upon under the GDPR, the UK GDPR and the DPA to process personal information held about Data Subjects is as follows:

- *Categories 1, 3 and 4* – We use this personal information to carry out our obligations arising from the Governing Agreements, to take steps at investors’ or Data Subjects’ request prior to entering into an agreement, and to send informational messages to investors or Data Subjects.

- *Categories 2 and 3* - We use this personal information to comply with our legal obligations. We may also process other categories of personal information for this purpose.
- *Categories 1, 3 and 4* - We use this personal information to carry out our obligations arising from the Governing Agreements, to comply with applicable law and the Governing Agreements and where it is necessary for the purposes of the legitimate interests pursued by us that are not overridden by the interests or fundamental rights and freedoms of Data Subjects.
- *Category 5* – We use this personal information to carry out our obligations arising from the Governing Agreements, and to send informational messages to Data Subjects to the extent allowed by applicable law and which are in our legitimate interests to provide the services set forth in and required by the Governing Agreements.

### **Conditions for Fair Processing of Personal Information under the Cayman Islands’ Data Protection Act 2021 (“Cayman DPA”)**

The conditions under the Cayman DPA which are met for the processing of personal information held about Data Subjects are as follows:

- *Categories 1, 3 and 4* – Processing Necessary for contract: We use this personal information to carry out our obligations arising from the Governing Agreements, to take steps at investors’ or Data Subjects’ request prior to entering into an agreement, and to send informational messages to investors or Data Subjects.
- *Categories 2 and 3* – Processing under Legal Obligation: We use this personal information to comply with our legal obligations. We may also process other categories of personal information for this purpose.
- *Categories 1, 3 and 4* – Processing for Legitimate Interests: We use this personal information to carry out our obligations under applicable law and the Governing Agreements and where it is necessary for the purposes of the legitimate interests pursued by us and the processing is not unwarranted by reason of prejudice to the rights and freedoms or legitimate interests of Data Subjects.
- *Category 5* – Processing Necessary for contract and Legitimate Interests: We use this personal information to carry out our obligations arising from the Governing Agreements, and to send informational messages to Data Subjects to the extent allowed by applicable law and which are in our legitimate interests to provide the services set forth in and required by the Governing Agreements.

### **Disclosure of Personal Information**

We do not disclose any personal information about Data Subjects to any third parties, except:

- as reasonably necessary or appropriate in connection with the management of Ivy, to the extent required and/or permitted under the Governing Agreements,
- to Global Atlantic Financial Group Limited (“GAFG”) in order for it to provide services to us and on our behalf, including communications with our investors,
- to processors who are only permitted to use it to perform services for us,
- as required and/or permitted by law, any applicable regulatory authority or the Governing Agreements, or
- to protect our rights, property, or safety or those of our clients and investors or others.

In these cases, we may share personal information with legal advisers, accountants, consultants, senior advisors, banks, administrators, custodians, brokers, financing sources and similar counterparties, external service providers, companies engaged to dispose of or store data including personal information, and adverse parties who have a legal right to receive such information and their counsel, experts and legal advisers.

We will take reasonably necessary steps, where possible, to ensure that where personal information is shared, it is treated securely and in accordance with this Privacy Notice and applicable laws.

#### **Personal Information Retention**

We aim not to keep personal information in a form that allows a Data Subject to be identified for any longer than is reasonably necessary for achieving the permitted purposes. At the end of the applicable retention period, we may destroy, erase from our systems, or anonymise personal information as part of such efforts, to the extent permitted by applicable law or regulation.

#### **Storage & Transfer of Personal Information**

We maintain physical, electronic and procedural safeguards designed to protect Data Subjects’ personal information, prevent unlawful or unauthorised processing of personal information, and prevent unauthorised disclosure of, or accidental loss of, or damage to, such personal information.

We may process personal information in, and transfer personal information to, countries that may not guarantee the same level of protection for personal information as the country in which Data Subjects reside.

Personal information will also be processed by staff (and third party service providers as set forth herein) who work for us and operate outside the European Economic Area (the “EEA”), the UK and the Cayman Islands, including to the United States of America. This includes staff (and third party service providers) engaged in, among other things, the provision of administration and support services, as well as GAFG. All such staff (and third party service providers) are subject to appropriate confidentiality and security obligations. In some cases, your data may be transferred to jurisdictions outside of the EEA and the UK

that do not have equivalent data protection frameworks to those inside the EEA. Transfers of personal information which is subject to the GDPR, the UK GDPR or the DPA to countries outside the EEA or the UK will generally be carried out under agreements using model clauses approved by the competent authorities. For more information contact us on the details below. Where we transfer personal information which is subject to the Cayman DPA to recipients who are located outside the Cayman Islands, we will, wherever possible, take all appropriate steps that are within our control to take to ensure that adequate legal safeguards are in place for personal information which are shared with such recipients (for example, by obtaining contractual assurances from the recipients).

We restrict access to non-public personal information about Data Subjects to those of our employees and agents who need to know the information to enable us to provide services.

We will generally only transfer personal information to third party service providers if they agree to comply with the physical, electronic and procedural safeguards described above, or if they put in place adequate measures themselves.

### **Rights in relation to Personal Information under the GDPR, the UK GDPR and the DPA**

Where applicable under the GDPR, the UK GDPR and the DPA, Data Subjects have certain rights in relation to their personal information, including the right to be informed about the collection and use of their personal information, as outlined in this Privacy Notice.

These include, where certain conditions are met:

- the right to request access to the personal information we hold about them,
- the right to have inaccurate information about them amended or updated,
- the right to object to the processing of personal information about them,
- the right to withdraw consent at any time (where relevant),
- the right to have personal information about them erased or to restrict processing in certain limited situations,
- the right to data portability and to request the transmission of personal information about them to another organisation,
- the right to object to automated decision making that materially impacts them, direct marketing, and processing for research or statistical purposes, and
- the right to lodge complaints with applicable data supervisory authorities.

Data Subjects should use the contact information below to get more information and/or to make a formal request.

### **Rights in relation to Personal Information under the Cayman DPA**

Where applicable under the Cayman DPA, Data Subjects have certain rights in relation to their personal information, including the right to be informed about the collection and use of their personal information, as outlined in this Privacy Notice.

These include, where certain conditions are met:

- the right to ask us to confirm whether or not we handle any personal information about them,
- the right to request copies of the personal information we hold about them,
- the right to have inaccurate or incomplete information about them amended or updated,
- the right to request that we cease processing, or do not begin processing, personal information about them,
- the right to request that we do not subject them to automated decision using their personal information,
- the right to object to us using their personal information for direct marketing purposes, and
- the right and contact details to make a complaint to The Office of the Ombudsman at their contact email address of: [info@ombudsman.ky](mailto:info@ombudsman.ky).

### **Keeping Personal Information Up-to-date**

We will endeavour to keep the personal information we store about Data Subjects reasonably accurate and up-to-date by enabling Data Subjects to correct it by request. Data Subjects should notify us if any of their personal information changes or if they become aware of any inaccuracies in the personal information we hold about them.

### **Changes to this Privacy Notice**

We reserve the right to modify this Privacy Notice at any time and without prior notice.

### **Questions**

If Data Subjects have any questions in relation to this Privacy Notice, please contact [privacy2@ivyllc.com](mailto:privacy2@ivyllc.com).