POMONA EUROPE ADVISERS LIMITED

Personal Information Notice

Pomona Europe Advisers Limited (**Pomona, we/us/our**) wants you to be familiar with how we collect, use and disclose personal information. This Personal Information Notice (the "**Notice**") describes our practices in connection with personal information that we collect in the course of providing services to you.

PERSONAL INFORMATION

"**Personal Information**" is information that identifies you as an individual or relates to an identifiable individual. Personal Information we may collect includes:

- Name
- Residential address
- Mailing address (if different)
- Telephone number
- Email address
- Tax identification number
- Financial account information
- Certain net worth information
- Bank account information, including account name, account number and wire instructions
- Certain information related to ensuring compliance with the international "Common Reporting System (i.e., "CRS"), including jurisdiction of tax residency, and for those deemed to be "Controlling Persons" under CRS, residential address, mailing address (if different), date of birth, place of birth and tax identification number
- Anti-crime and fraud information, including information relating to your financial situation, your creditworthiness or any criminal or fraudulent activities provided to us by you or third parties including information which establishes your identity, such as driving licences, passports and utility bills; information about transactions, credit ratings from credit reference agencies or information pooling groups; fraud, offences, suspicious transactions, politically exposed person and sanctions lists where your details are included
- Records of your correspondence with us
- Details of your visits to our website (i.e., www.pomonacapital.com) and information collected through cookies and other tracking technologies including, but not limited to, your IP address and domain name, your browser and operating system, traffic data, location data, web logs, device data and other communication data, and the resources that you access

Collection of Personal Information

We may collect Personal Information in a variety of ways, including:

- From you, when you visit or call our offices, when you send us an email message, when you sign on as an investor, when you use our services, or when you fill out an agreement with us or fill out a subscription agreement to make an investment in a Pomona-sponsored fund (each a "**Pomona Fund**"); and

- From other sources, such as third-party placement agents or other intermediaries involved in activities related to Pomona Funds, publicly available databases or our affiliates, when they share the information with us.

We generally need to collect Personal Information in order to provide the requested services to you, including to manage a commitment made to a Pomona Fund. If you do not provide the information requested, we may not be able to provide the services or accept your commitment in a Pomona fund. If you disclose any Personal Information relating to other people to us or to our service providers in connection with the services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Notice, and you have provided or directed such other people to this Notice.

Use of Personal Information

We may use Personal Information for our business purposes including:

Providing the functionality of the services and fulfilling your requests.

- To provide the services' functionality to you, such as arranging access to your investor account, and providing you with related service.
- To respond to your inquiries and fulfill your requests, for example, when you contact us with questions, suggestions, compliments or complaints, or when you request other information about our services.
- To send administrative information to you, such as changes to our terms, conditions and policies.

We will engage in these activities to manage our contractual relationship with you, to pursue our legitimate interests (in enabling us to perform our obligations and provide our services to you or to notify you about changes to our service), and/or to comply with a legal obligation. Where this includes special categories of personal data (such as political affiliation or offences), we will engage in these activities because it is in the substantial public interest (processing for the prevention and detection of fraud/crime), or for our legal claims, or very rarely where necessary, explicit consent

Providing you with our newsletter and/or other marketing materials

- To send you our periodic newsletters and other marketing-related materials by post, email, phone, SMS or online or social media advertisement, with information about your investment, our services, new products and other company news. We will engage in this activity with your consent (where required by applicable law) or where we have a legitimate interest (i.e., to keep you updated with news in relation to our products and services)

Aggregating and/or anonymizing Personal Information.

- We may aggregate and/or anonymize Personal Information to pursue our legitimate interests (i.e., to analyse the data for various purpose but in a manner that can have no impact on you).

Complying with legal or regulatory requirements, or as otherwise permitted by law

- To comply with our legal and regulatory requirements;
- For audits, to verify that our internal processes function as intended and are compliant with legal, regulatory or contractual requirements; and
- For fraud and security monitoring purposes, for example, to detect and prevent cyberattacks or attempts to commit identity theft.

We engage in these activities to manage our contractual relationship with you, to comply with a legal obligation, and/or because we have a legitimate interest (to cooperate with law enforcement and regulatory authorities).

Accomplishing our business purposes.

- For data analysis, for example, to improve the efficiency of our services;
- For developing new products and services;

- For enhancing, improving, or modifying our current products and services;
- For determining the effectiveness of our promotional campaigns, so that we can adapt our campaigns to the needs and interests of our investors; and
- For operating and expanding our business activities, for example, understanding which parts of our services are of most interest to our investors so we can focus our energies on meeting our investors'
- Interests.

We engage in these activities because we have a
legitimate interest (i.e., to manage our business, to ensure the quality and legality of our services, to allow us to improve our services and to allow us to provide you with the content and services on the website).

Disclosure of Personal Information

We may disclose Personal Information for the business purposes above:

- To our affiliates.
- To our third-party service providers and business partners, to facilitate services they provide to us. These can include providers of services such as legal advice, tax and audit assistance, data analysis, transaction processing, information technology and related infrastructure provision, customer service, auditing, and other services.

Other Uses and Disclosures

We may also use and disclose your Personal Information as necessary or appropriate, especially when we have a legal obligation or legitimate interest to do so:

- To comply with applicable law and regulations, which may include laws outside your country of residence;
- To cooperate with public and government authorities, including law enforcement, in order to respond to a request or to provide information we believe is important. These can include authorities outside your country of residence; and
- To enforce our terms and conditions and to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.

We have a legitimate interest in disclosing or transferring your Personal Information to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring entity and its advisers.

SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect Personal Information within our organization.

CHOICES AND ACCESS

We give you choices regarding our use of your Personal Information for the purposes of sharing our views on the state of the market, new Pomona Funds or any other matters.

You may opt-out from:

- **Receiving communications from us**: If you no longer want to receive communications from us on a going forward basis about our views on the state of the market, new Pomona Funds or any other matters, you may opt-out by emailing Vivian Flynn at *vflynn@pomonacapital.com, or sending a letter to the attention of Vivian Flynn at Pomona Capital, 780 Third Avenue, 37th Floor, New York, NY USA 10017.*

We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving such communications from us, we may still send you important administrative messages and other messages relating to an existing investment in a Pomona Fund, from which you cannot opt-out.

How you can access, change or delete your Personal Information

If you would like to request to review, correct, update, suppress, restrict or delete Personal Information that you have previously provided to us, or if you would like to request to receive an electronic copy of your Personal Information for purposes of transmitting it to another company (to the extent this right to data portability is provided to you by applicable law), you may contact us by emailing Vivian Flynn at *vflynn@pomonacapital.com, or sending a letter to the attention of Vivian Flynn at Pomona Capital, 780 Third Avenue, 37th Floor, New York, NY USA 10017.* We will respond to your request consistent with applicable law.

You also may lodge a complaint with a data protection authority for your country or region or where an alleged infringement of applicable data protection law occurs. In the UK, the relevant authority is:

The Information Commissioner's Office
Visit: https://ico.org.uk/global/contact-us/

In your request, please make clear what Personal Information you would like to have changed, whether you would like to have your Personal Information suppressed from our database or otherwise let us know what limitations you would like to put on our use of your Personal Information. For your protection, we may need to verify your identity before implementing your request. We will try to comply with your request as soon as reasonably practicable.

Please note that your requests may be subject to certain exemptions as set out in applicable data protection law(s). For example, we may need to retain certain information for recordkeeping purposes in order to comply with applicable law and/or internal compliance policies, as well as to complete any transactions that you began prior to requesting a change or deletion (e.g., when you initiate a transaction, you may not be able to change or delete the Personal Information provided until after the completion of such transaction).

RETENTION PERIOD

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

The criteria used to determine our retention periods include:

- The length of time we have an ongoing relationship with you and provide services to you (for example, for as long as you have an account with us or keep using the services);
- Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them); or
- Whether retention is advisable in light of our legal position (such as in regard to applicable statutes of limitations, litigation or regulatory investigations).
- When Personal Information is no longer needed, we either irreversibly anonymise the data (and we may further retain and use the anonymised information) or securely destroy the data.

JURISDICTION AND CROSS-BORDER TRANSFER

Your Personal Information may be stored and processed in any country where we have facilities or in which we engage service providers, and by using our services you understand that your information will be transferred to countries outside of your country of residence, including the United States, the Cayman Islands and Hong Kong, which may have data protection rules that are different from those of your country.

Some of the non-UK countries are recognized by the UK Secretary of State as providing an adequate level of data protection according to EEA standards (the full list of these countries is available here https://ico.org.uk/). For transfers from the UK to countries not considered adequate by the UK Secretary of State, we have put in place adequate measures, such as approved standard contractual clauses, to protect your Personal Information. You may obtain a copy of these measures by contacting us as described in the "Contacting Us" section below.

SENSITIVE INFORMATION

We ask that you not send us, and you not disclose, any sensitive Personal Information (*e.g.*, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics) on or through our services or otherwise to us.

CONTACTING US

Pomona Europe Advisers Limited, located at 80 Brook Street, London UK, W1K 5EG, is the company responsible for collection, use and disclosure of your Personal Information under this Notice.

If you have any questions about this Notice, please contact us at vflynn@pomonacapital.com, or:

Pomona Capital
Attn: Vivian Flynn
780 Third Avenue, 37th Floor
New York, NY USA 10017

Pomona reserves the right to modify this Notice at any time without prior notice. Updates or changes to this Notice will be made directly to this Notice without notification and any such changes will be effective upon posting.