

DATA PRIVACY NOTICE

The purpose of this Data Privacy Notice is to provide you with information on our use of Personal Data (as defined below). Our privacy practices are founded on global best practices based on international privacy laws, including the EU General Data Protection Regulation, the Cayman Islands Data Protection Law, 2017 and the California Consumer Privacy Act (the “**CCPA**”).

In this Data Privacy Notice, “we”, “us” and “our” refers collectively to Dragoneer Investment Group, LLC and its affiliates (together, “**Dragoneer**”), including investment funds managed, advised or administered by Dragoneer (each, a “**Fund**”). Our privacy commitment may apply differently in the context of any particular entity.

This Notice applies to all natural persons who are not covered by either our Investor Privacy Notice for Natural Persons or our Employee Privacy Notice. If you are an institutional investor that provides us with Personal Data on individuals connected to you for any reason in relation to your investment with us, the content of this Data Privacy Notice applies to such individuals also (and you should provide a copy of this Notice to such individuals or otherwise advise them of its content), unless otherwise exempted pursuant to applicable law. This Data Privacy Notice is sometimes referred to as our “Online Privacy Policy” and can be accessed online at www.dragoneer.com.

“**Personal Data**” as used in this Notice means personal information that reasonably can be used to identify any individual person. For example, we obtain Personal Data about investors when an investor participates in a Fund (including through the initial application and ongoing interactions with the Fund and persons engaged by the Fund) and about individuals connected with investors (for example directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners or agents) when investors provide us with personal information about those individuals.

Notice of Collection and Use of Personal Data

What Categories of Personal Data we Collect

We collect the following categories of Personal Data:

- **Identifiers**: Identifiers such as your real name, alias, postal and residential address, email address, account name, Social Security number, driver’s license number, state identification card number, contact details, corporate contact information, tax identification number passport number, insurance policy number and other similar identifiers.
- **Protected Classifications**: Information classified as personal or protected information by state, federal or other applicable law, including your nationality, place and date of birth, race, color, national origin, age, sex, gender, marital status, number of children, citizenship status, information on criminal history/unlawful conduct and correspondence records.
- **Commercial Information**: Commercial information, including tax information, credit history, bank account details, money transfers including communications on bank transfers, source of funds details, investor profile and details related to your investment activity, including financial products or investment services purchased, obtained, or considered, and other investing or consuming histories or tendencies.
- **Sensory Information**: Voice mail, audio, visual (including your photograph and signature) and similar information.
- **Employment Information**: Professional or employment-related information, including your employment, employer’s name, and income.

- Education Information: Education information, including your level of education.
- Inferences: Inferences that we draw from your personal information in connection with a determination as to your suitability to make an investment, your capacity to evaluate the merits and risks of investments and your qualification to make an investment according to the terms of such investment.

How we Collect your Personal Data

We collect Personal Data in various ways. In particular, you will provide us with Personal Data within the forms and any associated documentation that you complete when subscribing for interests in a Fund; when you provide it to us or our service providers in correspondence and conversations (including by email); when you make transactions with respect to a Fund; when you provide remittance instructions; and when you visit our facilities.

We may also obtain Personal Data on you from our portfolio companies, vendors (e.g., background check providers), advisors and other business partners, social media networks or other publicly accessible directories and sources. These may include websites; bankruptcy registers; tax authorities; governmental agencies and departments and regulatory authorities to whom we have regulatory obligations; credit reference agencies; sanctions screening databases; and fraud prevention and detection agencies and organizations, including law enforcement.

How we Use your Personal Data

We collect, store and use your Personal Data for business or commercial purposes to which you have consented, and in addition, use for the following:

Processing that is necessary for the performance of a contract, including without limitation:

- administering or managing each Fund;
- processing your subscription and investment in each Fund, such as entering your information in the register of limited partners;
- sending you statements relating to your investment;
- facilitating the continuation or termination of the contractual relationship between you and each Fund; and
- facilitating the transfer of funds, and administering and facilitating any other transaction, between you and each Fund.

Processing that is necessary for compliance with applicable legal or regulatory obligations, including without limitation:

- undertaking investor due diligence including anti-money laundering and counter-terrorist financing checks, including verifying the identity and addresses of our investors (and, where applicable, their beneficial owners);
- sanctions screening and complying with applicable sanctions and embargo legislation;
- complying with requests from regulatory, governmental, tax and law enforcement authorities;
- surveillance and investigation activities;
- carrying out audit checks, and instructing our auditors;
- maintaining statutory registers; and
- preventing and detecting fraud.

Pursuing our legitimate interests, or those of a third party to whom your Personal Data are disclosed, including without limitation:

- complying with a legal, tax, accounting or regulatory obligation to which we or the third party are subject;
- assessing and processing requests you make;
- sending updates, information and notices or otherwise corresponding with you in connection with your investment in each Fund;
- investigating any complaints, or pursuing or defending any claims, proceedings or disputes;
- providing you with, and informing you about, investment products and services;
- managing our risk and operations;
- complying with audit requirements;
- ensuring internal compliance with our policies and procedures;
- protecting each Fund against fraud, breach of confidence or theft of proprietary materials;
- seeking professional advice, including legal advice;
- facilitating business asset transactions involving each Fund or related entities;
- monitoring communications to/from us (where permitted by law);
- creating, improving and developing our products and services; and
- protecting the security and integrity of our IT systems.

We will only process your personal data in pursuance of our legitimate interests where we have considered that the processing is necessary, proportionate and, on balance, our legitimate interests are not overridden by your legitimate interests, rights or freedoms.

Sharing your Personal Data

We do not sell any Personal Data to unaffiliated third-parties and have not sold any Personal Data, including no sales of Personal Data of minors under 16 years of age, in the past 12 months.

We may share your Personal Data with our agents and service providers. In certain circumstances we may be legally obliged to share your Personal Data with relevant regulatory authorities, administrative agencies, law enforcement agencies, ombudsmen or other oversight bodies such as the Cayman Islands Monetary Authority, the Tax Information Authority or the U.S. Securities and Exchange Commission. They, in turn, may exchange this information with foreign authorities, including tax authorities and other applicable regulatory authorities.

Our agents and service providers may process your Personal Data on our behalf, including with our banks, accountants, auditors and lawyers, which may be data controllers in their own right. Our service providers are generally processors acting on our instructions. Additionally, a service provider may use your Personal Data where this is necessary for compliance with a legal obligation to which it is subject (for example, to comply with applicable anti-money laundering and counter terrorist financing laws).

We may share your Personal Data with prospective creditors of a Fund or future or present portfolio company of a Fund, with portfolio companies directly, or with a third party that acquires, or is interested in acquiring, all or a substantial part of our assets or equity interests, or that succeeds us in carrying on all or a part of our business. In certain circumstances, we may share your Personal Data in connection with the investigation and assertion of legal rights.

Sending your Personal Data Internationally

If you are located outside of the United States, please be aware that the Personal Data we collect will be processed and stored in the United States. The European Commission has deemed that the United States does not offer the same level of data protection as the European Union. Other jurisdictions where you reside or are a citizen or where a Fund is established may similarly determine the same with respect to the data protection and privacy laws of that jurisdiction.

Retention and Deletion of your Personal Data

We will keep your Personal Data for as long as is consistent with the purposes for which we are processing it. For example, we may require it for our legitimate business purposes, to perform our contractual obligations, or where law or regulation obliges us to. We will generally retain an investor's Personal Data throughout the lifecycle of the relevant investment. We will retain some Personal Data after your relationship with us ends.

Automated Decision-making

We do not take decisions producing legal effects concerning you, or otherwise significantly affecting you, based solely on automated processing of your Personal Data, unless we have considered the proposed processing in a particular case and concluded that such processing is appropriate.

How do we Protect Personal Data?

We apply technical, physical, and administrative information security measures designed to protect against unauthorized or unlawful processing of Personal Data, and against accidental loss or destruction of, or damage to, Personal Data, although we cannot guarantee that these will always be effective.

Children's Privacy

Our services are not intended for children under the age of 18. We do not knowingly collect information from children under the age of 18, and we do not target children under the age of 18.

Data Subject Rights

Individuals in Australia, California, Canada, Cayman Islands, Europe, Hong Kong, Israel, Japan, Singapore, South Korea, Switzerland, the United Kingdom, and certain other jurisdictions, and investors in our Cayman Islands Funds, may have certain data subject rights. These rights vary, but may include a right to:

- be informed about the purposes for which your Personal Data are processed;
- access your Personal Data, including requesting us to disclose to you the Personal Data we have collected, used and disclosed about you during the past 12 months;
- stop direct marketing;
- restrict the processing of your Personal Data;
- have incomplete or inaccurate Personal Data corrected;
- ask us to stop processing your Personal Data;
- be informed of a Personal Data breach;
- complain to a data protection ombudsman;
- obtain a copy of your Personal Data in a portable format;
- opt out of the sale of Personal Data; and
- require us to delete your Personal Data in some limited circumstances.

How to Exercise your Data Subject Rights

Depending on your jurisdiction, you may also be entitled to direct any complaints in relation to our processing of Personal Data to your national or local data protection supervisory authority, or to the Cayman Islands Ombudsman, if the complaint is in relation to a Cayman Islands Fund. Please consult local authorities.

Individuals who submit requests for access or erasure of personal information will be required to verify their identity by answering certain questions. We will not disclose or delete any information until such individual's identity is verified. If you are making a request for access, we may not be able to provide specific pieces of personal information if the disclosure creates a substantial, articulable, and unreasonable risk to the security of your personal information, your account with us, or our systems or networks. If you are making a request for erasure, we will ask that you confirm that you would like us to delete your personal information again before your request is submitted. In certain circumstances, we may not erase all personal information, as permitted by applicable law.

You may designate an authorized agent to submit a request on your behalf by providing that agent with your signed permission to do so. If an agent makes a request on your behalf, we may still ask that you verify your identity directly with us and directly confirm with us that you provided the authorized agent permission to submit the request before we can honor the request. Agents who make requests on behalf of individuals will be required to verify the request by submitting signed authorization from the individual. We will not honor any requests from agents until authorization is verified.

California Disclosures

In the preceding 12 months, we have collected and used Personal Data in the manner described above in the sections "Notice of Collection and Use of Personal Data – *What Categories of Personal Data we Collect; – How we Collect your Personal Data; – How we Use your Personal Data.*" We may have disclosed to third parties for our business purposes all of the categories of Personal Data as described above in that section. We will not discriminate against you for exercising data subject access rights. Our website does not respond to Do Not Track Signals.

California's "Shine the Light" law permits California residents to annually request and obtain information free of charge about what personal information is disclosed to third parties for direct marketing purposes in the preceding calendar year. We do not share personal information with outside parties for their direct marketing.

Contact Us

We are committed to processing your Personal Data lawfully and to respecting your data protection rights. Please contact us if you have any questions, concerns or complaints about this notice or the Personal Data we hold about you. You may contact us by calling (855) 964-1786 or writing to us at information@dragoneer.com or at the following address:

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Attn: General Counsel

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