

EEA Disclosure Notice

Effective Date: 25 May 2018

Last Updated: 22 May 2018

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I. Introduction

This Privacy Policy describes how we at Polygon Global Partners LLP and our family of companies, including our affiliates and subsidiaries (collectively, “we” or “Polygon”) collect, use and share the Personal Information that we gather through the websites and other digital properties that are owned and operated by Polygon and that link to this Privacy Policy (collectively, the “Services”).

If you are in the European Union, Polygon owns and operates the Service that you are visiting and will be the data controller responsible for the collection and use of your Personal Information.

If you have any questions about this Privacy Policy or our information practices, please contact us using the options provided below.

Please read this Privacy Policy carefully. By using our Services, you consent to the information practices and other terms set forth in this Privacy Policy.

II. How We Collect and Use Personal Information

When we use the term “Personal Information,” we mean information that can be used to identify you as an individual person. We collect several categories of Personal Information through our Services, including information you provide, information collected automatically from your device, and information we obtain from third party sources. We use and share this Personal Information for the purposes described below, including as described under Additional Uses of Personal Information.

We rely on separate and overlapping bases to process your Personal Information lawfully. By way of example only, it may be necessary for us to process your Personal Information in certain ways in order to process a transaction you have requested or otherwise in accordance with a contract between us, or in certain cases we may process your Personal Information where necessary to further our legitimate interests, where those legitimate interests are not overridden by your rights and interests

A. Information You Provide

We collect Personal Information you provide, for example when you enter the information into form fields on our Services. For example, we may collect:



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Category of Personal Data	Purposes of Processing (see also Additional Uses of Personal Information below)	Legal Bases for Processing
Contact Information <i>including</i> name, telephone number, address, email address, signature	<p>To communicate with, pay funds to, keep records for, contract with, and provide services to investors, vendors, and employees;</p> <p>To perform marketing and research services for investors;</p> <p>To perform due diligence on or monitor target or portfolio company's key organizational individuals, key customers, partners, suppliers, shareholders, and debtholders;</p> <p>To perform background screening of investors and employees;</p> <p>To perform employee recruiting;</p> <p>To authenticate users; and</p> <p>To meet relevant regulatory requirements.</p>	<p>Legitimate interest</p> <p>Performance of contract</p> <p>Legal compliance</p> <p>Consent (where applicable)</p>
Employment Information <i>including</i> title/role, institution/company, location, compensation, work history, qualification/training	<p>To perform marketing and research services for investors;</p> <p>To perform due diligence on or monitor target or portfolio company's key organizational individuals, key customers, partners, suppliers, shareholders, and debtholders;</p> <p>To perform background screening of investors and employees.</p>	<p>Legitimate interest</p> <p>Performance of contract</p> <p>Legal compliance</p> <p>Consent (where applicable)</p>
Account/Financial Information <i>including</i> Contact Information, date of birth, bank account information, wire transfer	<p>To perform subscription, accounts, records, marketing, and onboarding services for investors;</p>	<p>Legitimate interest</p> <p>Performance of contract</p>



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<p>information, expense details, beneficiary designation, credit information, investor commitments, ledgers, positions, balances, percentages of fund, and share or option numbers, values, and vesting</p>	<p>To perform background screening of investors and employees;</p> <p>To meet relevant regulatory requirements;</p> <p>To communicate with, pay funds to, keep records for, contract with, and provide services to investors, vendors, and employees; and</p> <p>To perform due diligence on or monitor target or portfolio company's key organizational individuals, key customers, partners, suppliers, shareholders, and debtholders.</p>	<p>Legal compliance</p> <p>Consent (where applicable)</p>
<p>Government Identification Information <i>including</i> NI number, taxpayer identification number, date of birth, driver's license, passport, other official government identification and numbers, legal work status, KYC details</p>	<p>To perform marketing and research services for investors;</p> <p>To perform background screening of investors and employees;</p> <p>To meet relevant regulatory requirements;</p> <p>To comply with tax requirements; and</p> <p>To pay funds to, keep records for, contract with, and provide services to investors, vendors, and employees.</p>	<p>Legitimate interest</p> <p>Performance of contract</p> <p>Legal compliance</p> <p>Consent (where applicable)</p>
<p>Investment Analytics Information <i>including</i> investment history, analysis or proposals, preferences</p>	<p>To perform investor advisory services; and</p> <p>To perform due diligence on target or portfolio company's shareholders and debtholders.</p>	<p>Legitimate interest</p> <p>Performance of contract</p>
<p>Identification Information <i>including</i> photo, log-ins, dial-ins, tokens, codes, biometrics</p>	<p>To perform investment presentations; and</p>	<p>Legitimate interest</p> <p>Employment (where applicable)</p>



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	To secure physical and digital access control, electronic communications, and electronic asset management.	
Certification Information <i>including</i> investor or employee certification/accreditation details, conflicts information, approvals, registrations, licenses, and consents	To meet relevant regulatory requirements; and To perform background screening of investors and employees.	Legitimate interest Legal compliance Consent (where applicable)

B. Information Collected Automatically

As is true of most digital platforms, we gather certain information automatically when you use our Services. This information may include browser, device, cookie and similar data that we collect as follows:

Category of Personal Data	Purposes of Processing <i>(see also Additional Uses of Personal Information below)</i>	Legal Bases for Processing
Log Files including IP addresses, browser type, internet service provider, referring/exit pages, operating system, date/time stamp and/or clickstream data	To maintain the security of Polygon services, for fraud detection, and to protect Polygon’s rights	Legitimate interests
Cookies, Analytics and Related Technologies For more information, see “Cookies, Analytics and Related Technologies” below.		
Access Control Information <i>including</i> user names, email address, IP address, location pings	To authenticate users; and To secure digital access control.	Legitimate interest
Location Information including latitude, longitude, date and time (the precision of this data varies greatly and is determined by factors controlled by your device or mobile service provider)	To offer certain location-based services, such as delivering marketing that is location-relevant, and to conduct analytics to improve Polygon services	Legitimate interests Consent (where applicable)

1. Cookies, Analytics and Related Technologies

We may collect Personal Data about you, or information that becomes Personal Data if combined with other information, when you visit our websites and online services in order



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to manage Polygon services and email messages and to collect and track information about user activities online over time and across different websites. We rely on legitimate interests and consent, where applicable, for processing such data. We may use cookies to collect this information, which are small data files placed on your computer or mobile device that allow us to collect certain information whenever you visit or interact with our websites or online services. We may also use other data collection technologies (such as web beacons, pixels or tags) that embed graphic files in our websites and online services to collect such information.

- **Strictly Necessary:** Necessary to deliver our services (for example, essential cookies);
- **Performance and Functionality:** Enhance the performance and functionality of our services but are non-essential to their use (for example, performance and functionality cookies); and
- **Analytics and Customization:** Allow us to understand the effectiveness of our services, as well as to customize our services based on this information (for example, customization cookies and analytical web beacons).

You can control the use of certain cookies and related technologies by setting or amending your web browser controls to accept or refuse cookies (please visit your browser's help menu for more information).

If you choose to reject certain cookies, you may still use our websites and online services, though your access to some functionality and features may be restricted. If you have any questions regarding our use of cookies and other related technologies, see "Contact Us" below.

C. Information We Obtain from Third Party Sources

We may obtain certain Personal Information about you from third party sources, which we may use to serve our legitimate interests, comply with legal obligations, perform a contract, or in some cases, in accordance with your consent.

Business Partners and Service Providers: We use business partners and service providers, such as background screening vendors and research providers, to perform services on our behalf. Some of these partners have access to Personal Information about you that we may not otherwise have and may share some or all this information with us. We use this information to administer the Services as well as to process transactions that you request.

Supplemental Information: We may receive additional Personal Information from third-party sources, such as credit reference agencies or public databases. We may use this supplemental information to process transactions that you request and to prevent fraud, deliver relevant marketing to you and to improve our operations, Services and our marketing.



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D. Additional Uses of Personal Information

In addition to the uses described above, we may use your Personal Information for the following purposes, which uses may under certain circumstances be based on your consent, may be necessary to fulfill our contractual commitments to you, and are necessary to serve our legitimate interest in the following business operations:

- Operating our business, administering the Services and managing your accounts;
- contacting you to respond to your requests or inquiries;
- Processing and completing your transactions including, as applicable, electronic confirmations, processing payments and delivering services;
- providing you with newsletters, articles, service alerts or announcements, event invitations, and other information that we believe may be of interest to you;
- providing you with marketing and other information that are personally tailored to your interests and investment profile and/or you have requested;
- conducting market research, surveys, and similar inquiries to help us understand trends and investor needs;
- administering investor profiles, analyzing your investments with us, and improving our services and other offerings;
- alerting you about a correction of previously disseminated;
- preventing, investigating, or providing notice of fraud, unlawful or criminal activity, or unauthorized access to or use of Personal Information, our website or data systems; or to meet legal obligations; and
- enforcing our Terms of Use and other agreements.

E. Legitimate Interests

We rely on several legitimate interests in using and sharing your Personal Information. These interests include:

- communicating with, paying funds to, keeping records for, contracting with, and providing Services for you;
- performing due diligence and contractual obligations;
- filing for regulatory and legal compliance;
- improving and customizing the Services for you;
- understanding how the Services are being used;
- exploring ways to grow, administer, develop and market our business;
- ensuring the safety, security, and legal compliance of the Services; and
- enhancing protection against fraud, spam, harassment, and crime and security risks, including through background screening.

F. Data Retention

We will retain your Personal Information only for as long as is necessary for the purposes set out in this Privacy Policy (for example, if you have an account, for as long as your account is active), subject to your right, under certain circumstances, to have certain of your Personal



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Information erased (see “Your Rights” below), unless a longer period is required under applicable law or regulation or is needed to resolve disputes or protect our legal rights.

III. How We Share and Disclose Personal Information

We share your Personal Information with third parties only in the ways described in this Privacy Policy. We may share your Personal Information within our family of companies, with service providers and business partners, in connection with business transfers and to comply with the law and enforce our legal rights.

Service Providers: We share your Personal Information with third-party service providers who complete transactions or perform services on our behalf or for your benefit, such as for payment processing, marketing, analytics, processing employment applications and to verify personal data, such as mailing addresses.

Affiliates: We may share your Personal Information with affiliated legal entities within our family of companies for purposes and uses that are consistent with this Privacy Policy.

Business Partners: We may share your Personal Information with our business partners for the purpose of administering programs and services, such as administering the Services and managing your accounts, providing you with newsletters, articles, service alerts or announcements, event invitations, and other information that we believe may be of interest to you, and/or other uses listed under “Additional Uses of Personal Information” listed above.

Legal Process, Safety and Terms Enforcement: We may disclose your Personal Information to legal or government regulatory authorities as required by applicable law or regulation. We may also disclose your Personal Information to third parties as required by applicable law or regulation in connection with claims, disputes or litigation, when otherwise required by applicable law or regulation, or if we determine its disclosure is necessary to protect the health and safety of you or us, or to enforce our legal rights or contractual commitments that you have made.

Business Transfers: We may disclose your Personal Information to legal or government regulatory authorities as required by applicable law or regulation. We may also disclose your Personal Information to third parties as required by applicable law or regulation in connection with background screens, claims, disputes or litigation, when otherwise required by applicable law, or if we determine its disclosure is necessary to enforce our legal rights or contractual commitments that you have made.

IV. International Data Transfers

Polygon may transfer your Personal Information within our family of companies and/or to the third parties discussed above. Your Personal Information may be transferred to, stored, and processed in a country other than the one in which it was collected. We may transfer



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your Personal Information outside the European Economic Area (“EEA”) and when we do so, we rely on appropriate or suitable safeguards recognized under data protection laws.

Adequacy Decision: We may transfer your Personal Information to Canada, Guernsey, Isle of Man, Jersey or Switzerland, which the European Commission has approved as providing adequate protection to personal information.

Standard Contractual Clauses: The European Commission has adopted standard data protection clauses, which provide safeguards for personal information transferred outside of the EEA. We generally use Standard Contractual Clauses when transferring Personal Information from a country in the EEA to a country outside the EEA. You can request a copy of our Standard Contractual Clauses by contacting us as set forth in “Contact Us” below.

EU-U.S. Privacy Shield: If we transfer any of your Personal Information from the EEA to a third party outside the EEA who is certified under the EU-U.S. Privacy Shield Framework as set forth by the U.S. Department of Commerce, we may rely on such certification to ensure adequate protection for your Personal Information so transferred. You can learn more about Privacy Shield by visiting <https://www.privacyshield.gov/>.

With your consent: In respect of certain cross-border personal data transfers, we will obtain your consent to transfer your Personal Information outside the EEA after first informing you about the possible risks of such a transfer.

By contract: We will transfer your Personal Information outside the EEA if the transfer is necessary to the performance of a contract between you and Polygon, or if the transfer is necessary to the performance of a contract between Polygon and a third party, and the contract was entered into in your interest.

In addition, we may transfer your Personal Information outside the EEA if the transfer is necessary to establish, exercise or defend legal claims or to protect your vital interests.

V. Country Specific Information and Additional Policies

The laws of certain countries require specific information to be included in a privacy policy. Please click below to review country-specific information.

VI. Children’s Privacy

We are committed to protecting the privacy of children. Our Services are not directed to, and we do not intend to or knowingly collect or solicit Personal Information online from children under the age of 18. If you are under the age of 18, do not provide us with any Personal Information.



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VII. Your Rights

We process all personal information in line with your rights, in each case to the extent required by and in accordance with applicable law (including in accordance with any applicable time limits and fee requirements).

Upon request, we will provide you with information about whether we hold any of your Personal Information along with any details required to be provided to you under applicable law. In certain cases, you may also have a right to:

- rectify any of your Personal Information that is inaccurate;
- to restrict or limit the ways in which we use your Personal Information;
- to object to the processing of your Personal Information;
- to request the deletion of your Personal Information; and
- to obtain a copy of your Personal Information in an easily accessible format.

To submit a request, please contact us as set forth in “Contact Us” below. We will respond to your request within a reasonable timeframe.

You also have the right to withdraw your consent to our processing of your Personal Information, where our processing is solely based on your consent. You can do this by discontinuing use of the Services, including by closing all of your online accounts with us and contacting us as set forth in “Contact Us” below to request that your Personal Information be deleted. If you withdraw your consent to the use or sharing of your Personal Information for the purposes set out in this Privacy Policy, you may not have access to all (or any) of the Services, and we might not be able to provide you all (or any) of the Services. Please note that, in certain cases, we may continue to process your Personal Information after you have withdrawn consent and requested that we delete your Personal Information, if we have a legal basis to do so. For example, we may retain certain information if we need to do so to comply with an independent legal or regulatory obligation, or if it is necessary to do so to pursue our legitimate interest in keeping the Services safe and secure.

If you have any complaints regarding our privacy practices, you have the right to lodge a complaint with your national data protection authority (*i.e.*, supervisory authority).

Under California Law, California residents have the right to request in writing from businesses with whom they have an established business relationship, (a) a list of the categories of Personal Information that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties’ direct marketing purposes and (b) the names and addresses of all such third parties. To request the above information, please contact us as set forth in “Contact Us” below.



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VIII. Links to Third-Party Sites

The Services may include links to websites and digital services operated by third parties. This Privacy Policy does not apply to, and we are not responsible for the content, privacy policies or data practices of third parties that collect your information. We encourage you to review the privacy policies for those third parties to learn about their information practices.

IX. Updates to the Privacy Policy

Privacy Policy is subject to occasional revision, and if we make any material changes in the way we use your Personal Information, we will notify you by sending you an email to the last email address you provided to us and/or by prominently posting notice of the changes on the Services and updating the effective date above.

Any changes to this Privacy Policy will be effective upon the earlier of thirty (30) calendar days following our dispatch of an email notice to you or thirty (30) calendar days following our posting of notice of the changes on the Services. These changes will be effective immediately for new users of our Services.

Please note that at all times you are responsible for updating your Personal Information to provide us with your most current email address. In the event that the last email address that you have provided us is not valid, or for any reason is not capable of delivering to you the notice described above, our dispatch of the email containing such notice will nonetheless constitute effective notice of the changes described in the notice.

If you do not wish to permit changes in our use of your Personal Information, you must so notify us prior to the effective date of the changes and discontinue using the Services. Continued use of our Services, following notice of such changes shall indicate your acknowledgement of such changes and agreement to be bound by the terms and conditions of such changes.

X. Managing Communication Preferences

If you have opted in to our marketing communications (or where permitted by law, if you have provided us with your contact information), we may send you email messages, direct mailings, or other communications regarding services depending on the method of communication selected. You may ask us not to do so when you access our websites, or change your preferences by updating any accounts you have with us. At any time, you may elect to discontinue receiving commercial messages from us by submitting an opt-out request to the contact information below or by following the unsubscribe instructions in the form of the communication you received, as described below.

If you have opted in to our marketing communications (or where permitted by law, if you have provided us with your contact information), we may send you email messages, direct mailings, or other communications regarding services depending on the method of



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communication selected. You may ask us not to do so when you access our websites, or change your preferences by updating any accounts you have with us. At any time, you may elect to discontinue receiving commercial messages from us by submitting an opt-out request to the contact information below or by following the unsubscribe instructions in the form of the communication you received, as described below.

Printed Materials: To opt out of receiving printed marketing materials at your postal address, please write to us at the address below. Please be sure to include your name and mailing address exactly as they appear on the printed marketing materials you received.

Emails: To opt out of receiving marketing communications via email, please send an unsubscribe request to the email address below or click on the unsubscribe link at the bottom of the email that was sent to you and follow the directions on the resulting web page. Please note that you may continue to receive certain transactional or account-related electronic messages from us.

XI. Contact Us

If you have any questions, comments, requests or concerns about this Privacy Policy or other privacy-related matters, you may contact us in the following ways:

IR@tetragoninv.com
+44 (0)207 901 8300

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