

FIVESPAN PARTNERS, LP **PRIVACY NOTICE FOR CALIFORNIA CONSUMERS**

This notice contains disclosures required by the California Consumer Privacy Act, as amended by the California Privacy Rights Act (“CPRA”). Terms defined in the CPRA have the same meaning when used in this notice. This notice is only relevant to California residents (“consumers” or “you”) and applies only to the collection or other use of “personal information” that is subject to the CPRA.

Information We Collect

We may collect, retain, and disclose certain types of personal information (“Personal Information”) for business purposes. Such information may include (i) identifiers, such as name, alias, email address, postal address, Internet Protocol (IP) address, account name, Social Security number, driver’s license number, passport number, or other similar personal identifiers, (ii) other personal information categories, as listed in the California Customer Records Statute, such as a signature, physical characteristics or description, telephone number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information, (iii) protected classification characteristics under California or federal law, such as age, race, citizenship, marital status, sex, veteran or military status, (iv) commercial information, such as records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies, (v) internet or other similar network activity, such as browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement, (vi) professional or employment-related information, such as current or past job history or performance evaluations, (vii) non-public education information, such as education records directly related to a student maintained by an educational institution or party acting on its behalf, (viii) inferences drawn from other personal information, such as a profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes, or (ix) other sensitive personal information, such as a driver’s license, state ID card, or passport number; account log-in data in combination with any access code, password, or account credentials; precise geolocation; racial/ethnic origin, religious/philosophical beliefs, or union membership; contents of mail, email, and text messages.

Personal Information does not include information that is publicly available, de-identified/ aggregated, or subject to Health Insurance Portability and Accountability Act (HIPAA) or the Gramm-Leach Bliley Act (GLBA).

We may collect Personal Information from the following categories of sources:

- Your communications with us;
- By observing your actions on our website;
- Service providers, including, but not limited to: administrators, lenders, banks, brokers, auditors, law firms, consultants, placement agents, employment agencies, credit bureaus;
- Portfolio companies;
- Nonprofit organizations; and
- Government entities.

We do not knowingly sell or share with third parties (for cross-context behavioral advertising) Personal Information from anyone under the age of 16.

Purpose for Collection and Use of Personal Information

We may collect or use Personal Information for one or more of the following purposes:

- Providing you with information about our products and services;

- Providing you with performance and other updates;
- One or more of the following business purposes:
 - Performing services (for us or our service provider or contractor) such as account servicing, processing orders and payments, and analytics;
 - Legal compliance;
 - Detecting and protecting against security incidents, fraud, and illegal activity;
 - Debugging;
 - Internal research for technological improvement;
 - Internal operations;
 - Activities to maintain and improve our services; and
 - Short-term, transient use, such that the Personal Information is not disclosed to another third party and is not used to build a profile about you.

The use of sensitive personal information is limited to only those purposes authorized under the CPRA.

Disclosing Personal Information

We may disclose Personal Information to:

- Service providers, including but not limited to: administrators, lenders, banks, brokers, auditors, law firms, consultants, placement agents, employment agencies, credit bureaus;
- Affiliates;
- Business partners;
- Legal or government regulatory authorities as required by applicable law;
- Third parties to whom you or your agents authorize us to disclose such information in connection with services we provide to you.

In the past 12 months, we have not sold or shared (for cross-context behavioral advertising) Personal Information to third parties.

Length of Time

We will keep your Personal Information for as long as necessary to comply with our regulatory obligations.

Rights of California Consumers

The CPRA provides a California consumer the following rights, subject to certain exceptions and limitations:

- The right to request: (a) the categories and specific pieces of Personal Information we collect about you; (b) the categories of sources from which we collect your Personal Information; (c) our business or commercial purposes for collecting, selling or sharing your Personal Information; (d) the categories of Personal Information disclosed for a business purpose or shared with third parties (for cross-context behavioral advertising) and the categories of persons to whom it was disclosed or shared; (e) the categories of your Personal Information (if any) that we have either sold, shared, or disclosed.
- The right to request that we delete your Personal Information, subject to certain exceptions.
- The right to opt out of our sale(s) (if any) of your Personal Information to third parties or sharing with such third parties for the purpose of cross-context behavioral advertising.
- The right to request we correct any inaccurate Personal Information maintained about you.

- The right to limit our use of your sensitive personal information to only use that is necessary to perform the services expected or provide the goods reasonably expected.
- The right not to receive discriminatory treatment for exercising your CPRA rights.

You may submit requests relating to your exercise of CPRA rights to us via:

phone: 415.318.7900

or

email: info@fivespan.com

Questions

If you have questions regarding this Notice, please contact us at info@fivespan.com.

Last updated: March 2024