

SUN CAPITAL WEBSITE CCPA/CPRA PRIVACY ADDENDUM

CALIFORNIA PRIVACY NOTICE ADDENDUM

This PRIVACY NOTICE ADDENDUM (“Privacy Notice”) supplements the information contained in the Privacy Policy of Sun Capital Advisors, Inc. (“Sun Capital”) and applies solely to all visitors, users, and others who reside in the State of California (“consumers” or “you”). All references to Sun Capital, ‘our,’ ‘us,’ ‘we’ or ‘company’ within this notice are deemed to refer to Sun Capital. We adopt this notice and incorporate into our Privacy Policy to comply with the California Consumer Privacy Act of 2018, as amended (“CCPA”) and other privacy laws. Any terms defined in the CCPA have the same meaning when used in this Privacy Notice.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“personal information”). In particular, we have collected the following categories of personal information from consumers within the last twelve (12) months:

Category	Examples	Collected
A. Identifiers.	A real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, Social Security number, driver’s license number, passport number, or other similar identifiers.	Yes
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card 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.	Yes
C. Protected classification characteristics under California or federal law.	Age (40 years or older), race, color, ancestry, national origin, citizenship, religion or creed, marital status, medical condition, physical or mental disability, sex (including gender, gender identity, gender expression, pregnancy or childbirth and related medical conditions), sexual orientation, veteran or military status, genetic information	No

	(including familial genetic information).	
D. Internet or other similar network activity.	Browsing history, search history, information on a consumer’s interaction with a website, application, or advertisement.	Yes
E. Geolocation data.	Physical location or movements.	Yes
F. Professional or employment-related information.	Current or past job history or performance evaluations.	Yes
G. Inferences drawn from other personal information.	Profile reflecting a person’s preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	Yes

Please note that “personal information” does not include:

- Publicly available information from government records;
- De-identified or aggregated consumer information; or
- Information excluded from the CCPA’s scope, including:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

We do not knowingly collect or solicit personal information from anyone under the age of 18.

We do not collect or use sensitive personal information other than:

- To perform services, or provide goods, as would reasonably be expected by an average consumer who requests those goods or services;
- As reasonably necessary and proportionate to detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted personal information;
- As reasonably necessary and proportionate to resist malicious, deceptive, fraudulent, or illegal actions directed at us and to prosecute those responsible for such actions;
- As reasonably necessary and proportionate to ensure the physical safety of natural persons;
- For short-term, transient use (but not in a manner that discloses such information to another third party or is used to build a profile of you or otherwise alter your experience outside of your current interaction with us);
- To perform services on behalf of our business; and
- To collect or process sensitive personal information where such collection or processing is not for the purpose of inferring characteristics about a consumer.

Some internet browsers have incorporated “Do Not Track” features. Most of these features, when turned on, send a signal or preference (the “DNT Signal”) to websites you visit indicating that you do not wish to be tracked. At this time, we do not currently respond to DNT Signals.

We obtain the categories of personal information listed above from the following categories of sources:

- Directly from our employees, clients or their representatives. For example, from documents that our employees, clients or their representatives provide to us in the course of employment or providing services to them.
- Indirectly from our employees, clients or their representatives. For example, through information we collect from our employees, clients and their representatives in the course of employment or providing services to them.
- Directly and indirectly from activity on our websites. For example, from submissions through our website portals or website usage details collected automatically (such as cookies).
- From third parties that interact with us in connection with the services we perform or who provide services to us. For example, investors and their advisors (who may provide, among other things, personal information about individual investors), acquisition targets and their advisors (who may provide personal information about the acquisition target’s directors, officers, and employees), and service providers we engage in the ordinary course of business (who may provide, among other things, personal information regarding their clients or obtained in connection with background checks).

Use of Personal Information

We may use the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason for which the information is provided (*e.g.*, to perform due diligence in connection with hiring, acquisitions, or investments).
- To provide you with information, products or services that you request from us, including but not limited to:
 - the administrative processes (and related communication) in preparing for the admission of investors to the fund(s);
 - ongoing communication with potential investors, their representatives, advisors and agents (including the negotiation, preparation and signature of documentation) during the process of admitting potential investors to the fund and the execution of all relevant agreements;
 - the performance of obligations under the governing documents of the funds (and all applicable anti-money laundering, KYC and other related laws and regulations) in assessing suitability of potential investors in the applicable fund;
 - ongoing operations, administrative, accounting, tax and other reporting, account maintenance and other processes and communication required to operate the business of the funds in accordance with its governing documents and other documentation between the parties, including customer service, processing or fulfilling transactions, verifying personal information, processing contributions and distributions and financing;
 - keeping investors informed about the business of the general partner or managing member of the applicable fund and its affiliates generally, including offering opportunities to make investments other than to the applicable fund and related advertising;
 - administering, managing and setting up an investor’s account(s) to allow such potential investor to purchase its holding (of shares) in the fund(s);

- facilitating the execution, continuation or termination of the contractual relationship between a investor and the general partner and/or the fund(s); and
- facilitating the transfer of funds, and administering and facilitating any other transaction, between a potential investor and the fund(s).
- To audit and verify our services related to investor interactions, including but not limited to, verifying the quality and effectiveness of services and compliance.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us.
- To improve our website and present its contents to you.
- As necessary or appropriate to protect the rights, property or safety of us, our clients or others.
- To maintain the safety, security and integrity of our products and services, databases, technology assets and business, including detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of assets (either our assets or assets of a third party in connection with mergers, acquisitions, or other corporate transactions), in which personal information is among the assets transferred or is related to employees of acquired or sold businesses.

Additionally, we may use your personal information to keep you informed of our products and services, if you have provided your consent to us doing so, or where we have an existing relationship with you and we wish to contact you about products and services similar to those which we provide you, in which you may be interested. You may opt-in to certain kinds of marketing, or all forms of marketing at any time, by contacting us and you may unsubscribe to receiving emails by clicking on the "opt-out" or "unsubscribe" link provided in all our marketing emails.

We retain the categories of personal information set forth above in the "Information We Collect" section only as long as is reasonably necessary for those purposes set forth above, except as may be required under applicable law, court order or government regulations.

Sharing Personal Information

We do not share (i.e., disclose personal information for the purposes of cross context behavioral advertising) or sell any of the personal information we collect about you to third parties. In the preceding twelve (12) months, we have not sold or shared any of the personal information we collect about you to third parties.

Within the last twelve (12) months, we have disclosed personal information collected from you for a business purpose to the categories of third parties indicated in the chart below. We may also disclose your information to other parties as may be required by law or regulation, or in response to regulatory inquiries.

Personal Information Category	Category of Third-Party Recipients
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A. Identifiers	Affiliates, service providers, administrators (including, fund accounting administrators), lenders, banks, auditors, tax consultants, tax preparers, KYC/AML providers, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations (and including the SEC, FCA, and CIMA), consultants and placement agents.
B. Additional data subject to Cal. Civ. Code § 1798.80	Affiliates, service providers, administrators (including, fund accounting administrators), lenders, banks, auditors, tax consultants, tax preparers, KYC/AML providers, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations (and including the SEC, FCA, and CIMA), consultants and placement agents.
C. Internet or other similar network activity	Affiliates, service providers, law firms, government agencies or pursuant to legal process.
D. Inferences drawn from other personal information	Affiliates, service providers, law firms, government agencies or pursuant to legal process.

Your Rights and Choices

The CCPA provides consumers with specific rights regarding their personal information. This section describes your CCPA rights and explains how to exercise those rights.

Deletion Rights: You have the right to request that we delete any of your personal information that we retain, subject to certain exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations. We will notify you in writing if we cannot comply with a specific request and provide an explanation of the reasons.

Access and Data Portability Rights: You have the right to request that we disclose to you certain information regarding our collection and use of personal information specific to you. Such information includes:

- The categories of personal information we collected about you;
- The categories of sources from which the personal information is collected;
- Our business or commercial purpose for collecting such personal information;
- Categories of third parties to whom we disclose the personal information;
- The specific pieces of personal information we have collected about you; and
- Whether we disclosed your personal information to a third party, and if yes, the categories of personal information that each recipient obtained.

Correction Right: You have the right to request that we correct any inaccuracies in the personal information that we retain, subject to certain statutory exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations. We will notify you in writing if we cannot comply with a specific request and provide an explanation of the reasons.

No Discrimination: We will not discriminate against you for exercising your rights under the CCPA, including by denying you goods or services, charging you different prices for goods or services or providing you a different level or quality of goods or services. However, we may offer you certain

financial incentives with respect to the sale and deletion of your personal information that are permitted under the CCPA.

How to Exercise Your Rights: To exercise any of your rights under the CCPA, please submit a request using any of the methods set forth below.

- Call us using the following toll-free number: 888-424-7023
- Email us at the following email address: dcouch@suncappart.com
- Submit a request online using the following online portal:
<https://suncappart.com/webform-data-request/>
- Write to us at the following address:
Sun Capital Advisors, L.P.
Attn: Sun Capital General Counsel
5200 Town Center Circle, 4th Floor
Boca Raton, FL 33486
(561) 394-0550

We will contact you to confirm receipt of your request under the CCPA and request any additional information necessary to verify your request. We verify requests by matching information provided in connection with your request to information contained in our records. Depending on the sensitivity of the request and the varying levels of risk in responding to such requests (for example, the risk of responding to fraudulent or malicious requests), we may require you to use the authentications process through our investor portal in order to verify your request.

You may designate an authorized agent to make a request under the CCPA on your behalf, provided that you provide a signed agreement verifying such authorized agent's authority to make requests on your behalf, and we may verify such authorized person's identity using the procedures above. If we request you verify your request and we do not receive your response, we will pause processing your request until such verification is received.

Our goal is to respond to any consumer request within forty-five (45) days of our receipt of such request. We will inform you in writing if we cannot meet that timeline and may contact you if we need additional information to process your request (*e.g.*, to confirm your identity or to inform you how to remedy a technically deficient consumer request).

Changes to Our Privacy Notice

We reserve the right to amend this Privacy Notice from time to time and for any reason, in our sole discretion, without notice, by updating this Privacy Notice. Accordingly, users are strongly encouraged to review our Privacy Notice regularly. If we decide to change our Privacy Notice, we will post those changes so our users are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If at any point we decide to collect personal information or use any collected information in a manner different from that stated at the time it was collected, we will notify users by posting changes on this page. We will use information only in accordance with the Privacy Notice under which the information was collected. Your continued access or use of this site following the posting of changes to this Privacy Notice means that you accept such revisions, changes and/or amendments. If you object to any of the changes to this Privacy Notice, please stop accessing this site. Please check this page frequently and review any changes to this Privacy Notice carefully so you are aware of any changes, as they are binding on you.

This Privacy Policy was last updated December 2022.

Contact Information

If you have any questions or concerns about this Privacy Policy, please contact Pia Terol (Marketing Communications Manager) or Deryl Couch (Managing Director and General Counsel) at:

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