

DATA PRIVACY NOTICE

The purpose of this Data Privacy Notice is to provide you with information on our collection, use and disclosure of Personal Data (as defined below). Our privacy practices are founded on global best practices based on international privacy laws, including the EU and UK General Data Protection Regulations, the Cayman Islands Data Protection Act (As Revised), the Hong Kong Personal Data (Privacy) Ordinance, and the California Consumer Privacy Act (the “CCPA”). The CCPA does not apply to data processed pursuant to the U.S. federal financial data protection law.

In this Data Privacy Notice, “we”, “us” and “our” refers collectively to Dragoneer Investment Group, LLC, Dragoneer Asia Limited, and their 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.

If you are a natural person investor in a Fund or the holder of an account managed directly or indirectly by us (or, in either case, their representative), please refer to the Investor Privacy Notice for Natural Persons (as available in our investor portal or otherwise provided to you) for further information about how Dragoneer collects and processes personal information about its current, prospective and former investors. 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. In the event of any conflict between the terms of that notice and this Data Privacy Notice, the terms of our Investor Privacy Notice for Natural Persons will control. This Data Privacy Notice is sometimes referred to as our “Online Privacy Policy” and can be accessed online at www.dragoneer.com.

If you are located outside the European Economic Area (“EEA”), the United Kingdom (“UK”) or the Cayman Islands, by accessing and using this website or using our services, you agree and consent to the collection, use and disclosure of your Personal Data as outlined in this Data Privacy Notice. If you are in the EEA, the UK or the Cayman Islands, this Data Privacy Notice is provided for informational purposes only.

“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 Data 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.

Some of the Personal Data we collect may be deemed sensitive under data protection laws, including identifiers such as Social Security number. We will use such information only for lawful purposes in compliance with data protection laws, and will not use sensitive personal information provided to infer characteristics about you other than as required to comply with law or legal process such as for anti-money laundering/know-your-customer purposes.

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.

You may be asked to provide some of the Personal Data referred to in this Data Privacy Notice for one or more of the purposes described above. If you fail to provide this Personal Data when requested, and the information is necessary for Dragoneer to comply with its legal or contractual obligations under applicable law, we may not be able to meet the obligations placed on us. In all other cases, the provision of Personal Data is voluntary.

How we Use your Personal Data

We collect, store and use your Personal Data for the following business or commercial purposes:

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;
- communicating within Dragoneer relating to our or our employees' activities;
- 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;
- maintaining our records, files, and other registers;
- 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.

In some cases, we rely on your consent to process your Personal Data. We will only rely on your consent where we have specifically asked for it and, in each case, you will have the right to withdraw your consent at any time.

Sharing your Personal Data

We do not sell any Personal Data 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 do not share Personal Data for purposes of cross-context behavioral advertising.

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, the Hong Kong Police (including without limitation the Joint Financial Intelligence Unit) 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.

We also may disclose Personal Data (1) when disclosure is necessary or appropriate to prevent harm or financial loss or in connection with an investigation of suspected or actual illegal activity, (2) to protect our operations, and (3) to establish and protect the rights, privacy, safety or property of Dragoneer, our affiliates, you, and others.

Cookies

We and our service providers use cookies and other online tracking mechanisms to track information about your use of our website. Cookies are alphanumeric identifiers that are transferred to your computer's hard drive through your web browser for record-keeping purposes. Some cookies allow us to make it easier for you to navigate our website, while others allow us to track your activities while using our website. Most web browsers automatically accept cookies, but if you prefer, you can edit your browser options to block them in the future. The Help portion of the toolbar on most browsers will tell you how to prevent your computer from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether.

Do Not Track (“DNT”) is a privacy preference that users can set in certain web browsers. We do not currently recognize or respond to browser-initiated DNT signals.

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 and regulatory authorities in the UK and the Cayman Islands have deemed that the United States and many other countries do not offer the same level of data protection as the EEA, the UK and the Cayman Islands. 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.

To the extent required by, and in accordance with, applicable data protection and privacy laws, we rely on appropriate or suitable safeguards in respect of international transfers of Personal Data, including:

- Using standard contractual clauses approved by relevant authorities as ensuring adequate safeguards;
- Obtaining your consent to transfer Personal Data after first informing you about the possible risks of such a transfer;
- When the transfer is necessary for the performance of a contract between you and us, or if the transfer is necessary for the performance of a contract between us and a third party, and the contract was entered into in your interest; and
- When the transfer is necessary to establish, exercise or defend legal claims.

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, including as required by applicable law. We may also retain Personal Data to investigate or defend against potential legal claims in accordance with the limitation periods of countries where legal action may be brought.

Automated Decision-making

We do not make 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, the kind of Personal Data we hold, and our policies and practices in relation to such data;
- confirm whether we hold any of your Personal Data and provide access to such 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;
- complain to a data protection authority;
- ask us to share a copy of your Personal Data in a portable format with another data controller;
- opt out of the sale or sharing of Personal Data; and
- require us to delete your Personal Data in some limited circumstances.

How to Exercise your Data Subject Rights

You can exercise any of these rights by contacting us using the contact information below. 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 in relation to their Personal Data 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 Data if the disclosure creates a substantial, articulable, and unreasonable risk to the security of your Personal Data, 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 Data again before your request is submitted. In certain circumstances, we may not erase all Personal Data, as permitted by applicable law. Depending on the jurisdiction, we may charge you a reasonable fee for processing Personal Data access requests. Please send any such requests using the contact information below.

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.

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.

Links to Other Websites

Dragoneer’s website may provide links to third-party websites. This Data Privacy Notice does not apply to those sites, which operate independently from Dragoneer’s website and are not under our control. These sites may have their own privacy notices in place, which we strongly suggest you review if you visit them. We are not responsible for the content of these sites, any products or services that may be offered through these sites or any other use of these sites, nor for any data processing and privacy practices associated with such sites.

Updates to this Privacy Notice

We may change this Data Privacy Notice from time to time at our sole discretion and encourage visitors to review this page for any updates to our Data Privacy Notice. It is your obligation to review this Privacy Notice from time to time. By using our services and visiting our website, you represent that you read, understand, and accept the terms of this Data Privacy Notice. Your continued use of our website and services following the posting of changes to terms contained in this notice will mean you understand and accept those changes.

Contact Us

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 (415) 539-3099 or writing to us at privacy@dragoneer.com or at the following address:

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