

TRUE WIND CAPITAL
WEBSITE PRIVACY POLICY

Thank you (“**you**” or “**user**”) for visiting the website of True Wind Capital Management, L.P. and its affiliates (together, “**True Wind**”, “**we**” or “**us**”). Your visit to this website (the “**Site**”) is subject to this Privacy Policy. By visiting the Site, you agree to this Privacy Policy, which may be updated by us at any time. If we update our Privacy Policy, we will post the updated document here. Any such changes will be effective upon posting. We urge you to review the Privacy Policy each time you visit the Site. If you do not agree with any provision of the Privacy Policy, you should not visit or use the Site.

This Privacy Policy concerns only the Site and does not concern any website to which the Site may link. Should you choose to visit these third-party sites, you should review their privacy policies to ensure that you understand and are comfortable with their practices concerning your personal information. Similarly, this Privacy Policy does not concern your interaction with True Wind in any manner other than your use of the Site. Finally, this Privacy Policy does not address our privacy practices with respect to any nonpublic personal information we may collect from you as an investor in investment vehicles that we sponsor or manage. We address these practices in separate notices to investors or potential investors.

We are committed to protecting the privacy of visitors to the Site. This Privacy Policy seeks to help you understand whether and how we collect information about you when you visit the Site, and how we use such information.

If you have any questions or comments about our Privacy Policy, you can email us at compliance@truewindcapital.com or write to us at True Wind Capital Management, L.P., Four Embarcadero Center, Suite 2100, San Francisco, CA 94111, Attn. Compliance.

What Information We Collect

When you enter and browse the Site, we may collect two different types of information about you: information you provide to us and information we collect through technology. True Wind may retain any information collected through the Site for an indefinite period of time.

In order to obtain access to certain information or materials provided via the Site, you may have to provide information that we collect and store in a way that allows us to relate it to you personally, including but not limited to your name, e-mail address, mailing address and phone number. We refer to such information as personal information. In addition, you may choose to contact us using links or contact information available on our Site. In such instances, you may provide information that we collect and store in a way that allows us to relate it to you personally, including but not limited to your name, e-mail address, mailing address and phone number. We may collect and retain a record of all communications with you, and we may monitor and record other activity on our Site for any reason or for no reason.

We may collect information about you through technology. For example, we may collect your IP address each time you request a page during a visit to the Site. (An IP address is often

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associated with the portal through which you enter the Internet.) At times, we may also use IP addresses to collect information regarding the frequency with which users browse various parts of the Site.

The Site may also use other technical methods to track and analyze the traffic patterns on the Site, such as the frequency with which our users visit various parts of the Site. These technical methods may involve the transmission of information either directly to us or to another party authorized by us to collect and process information on our behalf. We may also use these technical methods in e-mails that we send our Site users to determine whether such users have opened those e-mails and/or clicked on links in those e-mails. We may collect the information from use of these technical methods in a form that is personally identifiable.

During some visits to our Site, we may use software tools such as JavaScript to measure and collect session information, including page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse overs), and methods used to browse away from the page. We may use this information to measure Site activity, to develop ideas for improving our websites and for any other purpose to the extent permitted by applicable law.

How We Use Cookies

Our Site may use “cookies” to facilitate your ongoing access to and use of our Site and helps us in the ongoing maintenance of our Site. Cookies are small text files that may be placed on your browser when you visit our web site.

True Wind uses cookies primarily to capture anonymous analytics to improve our web site experience and performance. This includes compiling statistical information concerning, among other things, the frequency of use of our site, the pages visited, and the length of each visit, as well as information about your computer, operating system, browser, language, and country.

Using the settings on your Internet browser, you can choose to have your computer warn you each time a cookie is being sent, or you can choose to turn off all cookies. Consult your browser’s HELP menu to learn your options with respect to cookies. If you choose to turn off cookies, you may not have access to many features that make your browsing of our Site smoother, and some page navigation may not function properly. You may, at any time, delete any cookies by using the relevant option of your Internet browser or by deleting the cookies on your hard drive.

If you continue to use the Site with a browser set to accepting cookies, we will assume that you accept receipt of all cookies coming from the Site.

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Google Analytics

We use Google Analytics to collect information about your use of the Site. Google Analytics collects information such as how often users visit the Site, what pages users visit, and what other sites they visited prior to or after coming to the Site. More information on how Google Analytics uses your data can be found at www.google.com/policies/privacy/partners/. We use the information we get from Google Analytics only to improve the Site. By using the Site with your browser set to accepting cookies, you consent to Google Analytics' use of cookies on the Site.

Our Disclosure and Use of Your Personal Information

True Wind does not disclose any nonpublic personal information about its Site users to any nonaffiliated third party, except as set forth below.

We may use or disclose certain personal information we collect about you when you visit and browse the Site as part of our normal business operations.

We may also use third-party service providers in connection with the Site, such as Intralinks, which we use as a service provider for True Wind's online portal. More information on how Intralinks uses your data can be found at <https://www.intralinks.com/privacy>. These companies and individuals may have access to and use your personal information, as needed to perform their functions.

We will disclose personal information when we believe that such disclosures are required by law, regulation, legal process, subpoena, document or governmental request. We may also do so to protect your safety or security or to protect the safety and security of tangible or intangible property that belongs to us, to you or to third parties. Also, in the event that True Wind, or any portion of our assets or businesses, are acquired by or merged with another entity, whether an affiliate or a third party, user information may be one of the transferred assets. We may transfer all user information (which may include personal information) to our acquirers or successors. Other than as part of such transaction, we will not sell any of your personal information without your consent.

How We Use Your Non-Personal Information

Non-personal information is information that does not personally identify you, including anonymous information and aggregate data. We may use this information to understand better how our visitors use the Site, research our visitors' demographics, interests, and behavior, improve the Site, provide visitors with customized services and information, and for other similar purposes. We may combine this information with personal information. We may share this information with others and use this information in any manner permitted by law, but any disclosure that identifies you personally will be governed by the previous section.

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Protection of Information

We endeavor to protect your personal information. We use technical, administrative and physical methods to maintain the integrity and security of our databases, including firewalls. Please be aware though that there is no such thing as “perfect security” on the Internet, and third parties may unlawfully intercept or access transmissions or private communications. We will not be responsible or liable for any damages, losses or causes of action arising out of or in connection with the disclosure of your personal information. You use our Site and send us information at your own risk.

Do Not Track

We do not track visitors of the Site over time and across third party websites to provide targeted advertising and therefore do not respond to Do Not Track (“DNT”) signals. However, some third party sites do keep track of your browsing activities when they serve you content, which enables them to tailor what they present to you. If you are visiting such sites, your browser allows you to set the DNT signal so that third parties (particularly advertisers) know you do not want to be tracked. You may consult the help pages of your browser to learn how to set your preferences so that websites do not track you.

Information Requests

You have the right to request that we disclose to you or delete certain information about our collection and use of your personal information. Once we receive your request and verify your identity, we will disclose such information to you or delete the same, unless a legal exception applies. For example, we may deny your deletion request if retaining the information is necessary for us or our providers to complete the transaction for which we collected the personal information, provide a service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you.

To exercise the rights described above, please submit a request to us by either:

- Calling us toll-free at 866-780-9189
- Emailing us at compliance@truewindcapital.com

Your request must:

- Provide sufficient information that allows us to reasonably verify that you are the person about whom we collected personal information or an authorized representative of such person.
- Describe your request with sufficient detail to allow us to properly understand, evaluate, and respond to it.

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We cannot respond to your request or provide you with non-public personal information if we cannot verify your identity or authority to make the request and confirm that the requested personal information relates to you. We will use the information provided in a request solely to verify your identity or authority to make the request.

California's Shine the Light Law

California Civil Code Section 1798.83, known as the "Shine The Light" law, permits our Site users who are California residents to request and obtain from us a list of their personal information (if any) we disclosed to third parties for direct marketing purposes in the preceding calendar year and the names and addresses of those third parties. Requests may be made only once a year and are free of charge. We currently do not share any personal information with third parties for their direct marketing purposes.

Governing Law

The laws of the State of California govern this Privacy Policy. Any dispute relating to this Privacy Policy or your use of the Site or the Content shall be resolved solely in the state or federal courts located in San Francisco, California. You agree to waive trial by jury in any such action.

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