



Hamilton Lane®

Alliance Holdings

Privacy Notice

Data Protection Privacy Notice

The privacy of your personal data is of the utmost concern for Hamilton Lane Alliance Holdings and its subsidiaries and affiliates (collectively, “Hamilton Lane”, “we”, “us” or “our”). This data privacy notice (the “Notice”) details Hamilton Lane’s practices concerning the personal information of clients, investors and other parties to both affiliates of Hamilton Lane and nonaffiliated third parties. Recipients of this Notice include current, former and prospective clients and investors; employees of Hamilton Lane; and non-affiliated managers or general partners with whom Hamilton Lane has, or may in the future, conduct business (each a “Data Subject”). This website uses cookies and similar technologies. For further information on how the website uses cookies, please see here <https://www.hamiltonlane.com/Privacy-Policy/>.

Hamilton Lane is a data controller within the meaning of the European Union’s General Data Protection Regulation (“GDPR”). Hamilton Lane agrees to hold any nonpublic personal information provided in accordance with GDPR rules.

The registered address for Hamilton Lane (UK) Limited is 8-10, Great George Street, 3rd Floor, London, United Kingdom, SW1P 3AE.

Hamilton Lane collects non-public personal information about Data Subjects through the following: (i) limited partnership subscription agreements; (ii) information from your transactions and interactions with us and/or custodian banks and administrators; and (iii) forms or other documents prepared in the course of establishing and maintaining a relationship with us.

Third parties from whom we collect non-public personal information include: (i) companies who maintain anti-money laundering and terrorism sanction screening and know your customer databases; (ii) publicly available sources of know your customer information, including those made available through the Internet; and (iii) third-parties acting on your behalf such as consultants, accountants, custodians, legal advisors and other service providers or agents.

Non-public personal information will be processed by Hamilton Lane for the following purposes:

to comply with our legal and regulatory obligations;

to comply with our obligations under contract; and/or

there is a legitimate business interest in processing it.

Hamilton Lane has physical, electronic and procedural safeguards in place to protect a Data Subject’s non-public personal information. All third parties that handle information must agree to follow the standards for confidentiality that Hamilton Lane has established. Hamilton Lane generally may share a Data Subject’s non-public personal information with Hamilton Lane’s affiliates for legitimate commercial interests, including business administration and reporting. Hamilton Lane’s affiliates will be required to maintain such non-public personal information

confidential in a manner consistent with the GDPR or other privacy laws as applicable based on Hamilton Lane's or the Data Subjects' jurisdiction.

If a Data Subject prefers that Hamilton Lane not disclose nonpublic personal information about such Data Subject to its affiliates, such Data Subject may opt out of information sharing. However, notwithstanding any such opt-out, Hamilton Lane will be permitted to disclose personal information to its affiliates to the extent necessary or appropriate for such affiliates to perform services for the benefit of the Data Subject.

Except as required by applicable law and as described in this privacy notice, Hamilton Lane will not share any other nonpublic personal information about a Data Subject with its affiliates.

Disclosure of Non-public Personal Information to Non-Affiliates

Hamilton Lane does not sell or market a Data Subject's personal information to non-affiliated third parties. However, in order to serve Data Subjects better, Hamilton Lane will disclose personal information to non-affiliated third parties (including service providers such as administrators, tax preparers and accountants of HL funds into which a client invests as well as sponsors of underlying investors and their respective service providers to Hamilton Lane), but only to the extent necessary or appropriate for such third parties to perform services for the benefit of the Data Subject and only if Hamilton Lane received undertakings that such personal information will be kept confidential by such third parties after such disclosure. Where Hamilton Lane needs to process the Data Subject's personal information, and the Data Subject withholds their personal information, HL may not be able to perform or enter into its contract with the Data Subject or perform services for the Data Subject. Except as required by applicable law and described in this privacy notice, Hamilton Lane will not share any other nonpublic personal information about a Data Subject with non-affiliated third parties.

Occasionally, Hamilton Lane may also share a Data Subject's personal information where: (i) the Data Subject has consented to this; (ii) we buy or sell any business or assets, or if we are under a duty to disclose or share the Data Subject's personal information to comply with a legal obligation or to enforce this Privacy Policy or our Terms of Use; or (iii) where it is fair and reasonable to do so in the circumstances.

Where a Data Subject withdraws their consent to our processing of their personal information, this will not affect the lawfulness of any processing carried out by us prior to the withdrawal of the consent.

Disclosure of Non-public Personal Information outside the European Union

Non-public personal information may be transferred to countries outside the EEA which may not have the same or equivalent data protection laws or protections for the rights of Data Subjects to the EEA. Any such transfer will be made in compliance with applicable data protection legislation, and appropriate agreements are or will be in place to ensure compliance with applicable privacy rules and regulations. If you would like further information on the safeguards

we use in relation to personal information transferred outside the EEA, please contact gdpr@hamiltonlane.com.

Under the GDPR, Data Subjects have rights that can be exercised under certain circumstances in relation to nonpublic personal information that we hold:

The right to be informed;

The right of access;

The right to rectification;

The right to erasure;

The right to restrict processing;

The right to data portability; and

The right to object.

Please note that these are only available where the provision of such rights are provided for by the data protection and privacy laws and regulations of the governing regulatory authority. These rights will be exercisable, subject to limitations as provided for in EEA data protection legislation. Any Data Subject may make a request to Hamilton Lane to exercise these rights by contacting us at gdpr@hamiltonlane.com.

Please note that nonpublic personal information will be retained by Hamilton Lane for the duration of a Data Subject's investment or engagement with Hamilton Lane, and afterwards in accordance with Hamilton Lane's legal and regulatory obligations, including but not limited to Hamilton Lane's record retention policy.

For queries, requests or comments in respect of this Notice, or the way in which Hamilton Lane uses your non-public personal information, please contact us at gdpr@hamiltonlane.com.

A Data Subject can make a complaint to us by contacting us at gdpr@hamiltonlane.com or to the data protection supervisory authority – in the UK, this is the Information Commissioner's Office ("ICO"), at <https://ico.org.uk>.

Hamilton Lane reserves the right to update its Data Protection Policy at any time and, in such cases, we will make an updated copy available on our website, or where required by law, we will contact you directly.

Our Data Protection Officer provides help and guidance to make sure we apply the best standards to protecting your personal information. Should you have any questions about how we use your personal information please contact our DPO at fshaw@hamiltonlane.com or gdpr@hamiltonlane.com.

If you are a Data Subject to whom the California Consumer Privacy Act ("CCPA") applies, you may contact Hamilton Lane regarding CCPA requests at privacy@hamiltonlane.com or (484) 439 - 4819.