

PRIVACY POLICY OF POMONA MANAGEMENT LLC

FACTS	WHAT DOES POMONA MANAGEMENT LLC (“ POMONA ”) DO WITH YOUR PERSONAL INFORMATION?
Why?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share and protect your personal information. Please read this notice carefully to understand what we do.
What?	The types of personal information we collect and share depend on the product or service you have with us. This information can include: your social security number, name, address, account balances, assets, income, wire transfer instructions and transaction history. When you are no longer our customer, we may continue to share your information as described in this notice.
How?	All financial companies need to share customers’ personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers’ personal information; the reasons Pomona chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does Pomona share?	Can you limit this sharing?
For our everyday business purposes — such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes — to offer our products and services to you	No	We don’t share
For joint marketing with other financial companies	No	We don’t share
For our affiliates’ everyday business purposes — information about your transactions and experiences	No	We don’t share
For our affiliates’ everyday business purposes — information about your creditworthiness	No	We don’t share
For our affiliates to market to you	No	We don’t share
For non-affiliates to market to you	No	We don’t share

Questions?	Call Vivian Flynn at +1 (212) 593-3639
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What We Do	
How does Pomona protect my personal information?	To protect your personal information from unauthorized access and use, we use security measures that comply with federal law. These measures include computer safeguards and secured files and buildings.
How does Pomona collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • open an account • provide account information • seek information about your investments • make investments or withdrawals from your account • tell us where to send the money <p>We also collect your personal information from others, such as credit bureaus, affiliates, or other companies.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> • sharing for affiliates' everyday business purposes — information about your creditworthiness • affiliates from using your information to market to you • sharing for non-affiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p> <p>See Appendix A for more on your rights under state law.</p>
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>Pomona and its non-US affiliates collect and manage non-public information about our Clients and Investors through a centralized process that is used as part of day-to-day business of our organization.</i>
Non-affiliates	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> • <i>Pomona does not share with non-affiliates so that they can market to you. Non-affiliates we can share with include attorneys, accountants, lenders, auditors, placement agents, other service providers including information technology, persons or entities that are assessing our compliance with industry standards, underlying portfolio fund managers when required in order to participate in an investment or to such underlying portfolio fund managers and taxing authorities as may be requested from time to time in an effort to avoid or otherwise manage potential tax withholding.</i>
Joint marketing	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> • <i>Pomona does not jointly market.</i>
Other important information	
<p>See our Supplemental State-Specific Privacy Notice, attached as Appendix A, for additional information about the categories of personal information we collect and share, the individual rights granted under certain state laws, and how to exercise those rights. Pomona does not sell personal information. If you live in a state such as California or Vermont where the laws further restrict the sharing of your personal information, we will not share information we collect about you with nonaffiliates, unless the law allows, and we will limit sharing among our affiliates to the extent required by state law.</p>	

APPENDIX A

Supplemental State-Specific Privacy Notice

This notice applies to individuals only as and to the extent required by state law. You may live in a state that does not have an applicable law, or the law may contain exemptions that make this notice inapplicable to you.

DO NOT SELL	POMONA DOES NOT SELL PERSONAL INFORMATION
Purposes for which we collect personal information	The categories of personal information we collect depend on the product or service you have with us and may include your name, postal address, email address, Social Security number, driver's license number, passport number, professional or employment-related information and other financial information. If you visit our website, we may collect your Internet Protocol (IP) address, browsing history, search history and information regarding your interaction with our web sites, applications and advertisements.
Purposes for which we collect personal information	The business purposes for which we collect personal information include the provision of financial products and services (e.g. maintaining accounts, processing payments, servicing customers), auditing consumer interactions and transactions, detecting security incidents and preventing fraud, identifying and repairing errors that impair functionality, activities to verify or enhance the quality of services, and other internal uses permitted under applicable laws.
Third parties with which personal information is shared	All financial companies need to share personal information to run their everyday business. The categories of third parties with which Pomona shares personal information include service providers, third party administrators, brokers, banks, placement agents, and affiliates.
Individual Rights	Description
Right to deletion	Your right to request that Pomona delete your personal information, unless it is necessary for us to retain it for a purpose permitted by regulation or law.
Right to disclosure	Your right to request that Pomona disclose to you the following: (1) the categories of personal information we have collected about you, (2) the categories of sources from which the personal information is collected, (3) the business or commercial purpose for collecting the personal information, (4) the categories of third parties with which we share the personal information, and (5) the specific pieces of personal information we have collected about you.
Right to information about onward disclosures	Your right to request that Pomona disclose to you the following: (1) the fact that we do not sell your personal information, and (2) the categories of your personal information that we have disclosed for a business purpose.
Right to prohibit sales	Your right to direct a business that sells personal information to third parties not to sell your personal information. Pomona does not sell personal information.
Right to fair treatment	We may not discriminate against you for exercising any of your individual rights, such as by denying you products or services, charging you different prices or rates, or providing a different level or quality of products and services.

To exercise your individual rights, please call the telephone number listed on page 1 or visit <https://www.pomonacapital.com/contact>