

PRIVACY NOTICE

(Last Revised October XX, 2022)

Washington Harbour Partners, LP, inclusive with its affiliate Manager/General Partner (as applicable) for Washington Harbour Partners, LP (“WASHINGTON HARBOUR”)

Information We Collect About You and How We Collect It

We collect several types of information from and about users of services via forms supplied to customers and potential customers and our web site, including the following categories of information:

- (i) Identifiers. Legal name, postal address, email address, telephone number, password, social security number, birthdate, marital status, tax identification number, bank account information, driver’s license number, passport number, or copies of ID cards or other forms of identification.
- (ii) Contact Information. Residence address, principal place of business address, email address, and telephone numbers.
- (iii) Financial/Transaction Information. Bank account information, payment, and/or billing details.
- (iv) Investment Information. Investment objectives, prior investment experience, prior investment activity and documentation, and service-related investment terms and information.
- (v) Communications. Email or Website based communications and responses.
- (vi) Content. Any content which you provide to be posted or displayed (hereinafter, “posted”) on our Website, including but not limited to account profiles, preference settings, and other contributions.
- (vii) Personal information categories listed in the California Civ. Code Section 1798.0(e), if applicable, including, name, signature, Social Security number, physical characteristics or description, address, telephone number, passport number, driver’s license or state identification card number, bank account number.
- (viii) Internet or other similar network activity. Internet protocol (IP) address, your login information, browser type and version, the equipment you use to access our website (“Website”), and usage details.

We collect this information:

- (i) Directly from you when you provide it to us.
- (ii) Automatically as you navigate through our Website. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- (iii) From third parties, for example, our customers, business partners, and third-party services used by our Website to provide technical, customer, and sales support functions.

The information we collect on or through our Website may include:

- (i) Information that you provide by filling in forms or posting materials on our Website. This includes information provided at the time of registering to use our Website, creating or updating account profiles, and posting documents and other materials. We may also ask you for information when you report a problem with our Website.
- (ii) Records and copies of your correspondence (including email addresses).
- (iii) Your responses to surveys that we might ask you to complete for research purposes.
- (iv) Information posts or transmissions to third parties are done at your own risk.

Additionally, we cannot control the actions of other users of our Website with whom you may choose to share access and cannot and do not guarantee that your posts or transmitted material will not be viewable by others.

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- (i) Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on our Website.
- (ii) Information about your computer and internet connection, including your IP address, operating system, browser type, and crash data.
- (iii) The information we collect automatically may include personal information. Such information helps us to improve our Website and to deliver better and more personalized services, including by enabling us to:
 - (a) Estimate our audience size and usage patterns.
 - (b) Store information about your preferences, allowing us to customize our Website according to your individual interests.
 - (c) Speed up your searches.
 - (d) Recognize you when you return to our Website.

The technologies we use for this automatic data collection may include:

- (i) Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to the Website.
- (iv) Web Beacons. Pages of the Website and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages or opened an email and for other related

statistics (for example, recording the popularity of certain content and verifying system and service integrity).

- (v) Third Party Services. We may use third-party services, such as Google Analytics, to help understand your use of the Website.
- (vi) You may set preferences by utilizing the Google Analytics Opt Out Browser and similar features for other Third Party Services, but such preference may prevent you from accessing certain information or using certain services offered on the Website.

We do not intentionally collect personal information automatically, but we may tie automatically collected information to personal information about you that we collect from other sources you provide to us.

We do not currently respond to Do Not Track signals that provide a method to opt out of the collection of information about users' activities. If we do so in the future, we will update this privacy policy accordingly.

FACTS	WHAT DOES WASHINGTON HARBOUR PARTNERS, LP 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 to collect, share, and protect your personal information.
What?	<p>The types of personal information we collect and share depend on the product or service you apply for or have with us. This information can include: Social Security number, income, and employment information. Account balances, transaction history, and credit information Assets and investment experience.</p> <p>We use information that we collect about you or that you provide to us, including any personal information:</p> <ul style="list-style-type: none"> ● To provide you with information, products, or services that you request from us. ● To fulfill any other purpose for which you provide it. ● To provide you with notices about your user and account registration. ● To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, or between us and our customers. ● To notify you about changes to the Website or any products or services we offer or provide through it, including important services-related notices, updates to our privacy policy and Terms of Use ● In any other way we may describe when you provide the information. ● For any other purpose with your consent. ● We will only retain your information for as long as necessary to fulfill our service obligations. To determine the appropriate retention period of your information, we consider the amount, nature, and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure of the information, and the applicable legal and regulatory requirements.

	<ul style="list-style-type: none"> We will not sell any of your personal information to any third party for purposes of advertising, soliciting, or telemarketing.
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 WASHINGTON HARBOUR PARTNERS, LP chooses to share; and whether you can limit this sharing.

Reasons we can share your personal information	Does WASHINGTON HARBOUR PARTNERS, LP 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	Yes.	No.
For joint marketing with other financial companies	No	N/A.
For our affiliates' everyday business purposes — information about your transactions and experiences	Yes.	No.
For our affiliates' everyday business purposes — information about your creditworthiness	Yes.	Yes.
For our affiliates to market to you	No.	N/A.
For nonaffiliates to market to you	No	N/A

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of service and other agreements, including for enforcing contracts or policies, reporting on security breaches, or assisting with investigating and preventing fraud or security incidents.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of WASHINGTON HARBOUR PARTNERS, LP our customers, or others.

To limit our sharing	Email us at: ops@washingtonharbour.com or call us at: (202) 891-6202 Mail the form below Please note: If you are a <i>new</i> customer, we can begin sharing your information 45 days from the date we sent this notice. When you are <i>no longer</i> our customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.
Questions?	Email us at: ops@washingtonharbour.com or call us at: (202) 891-6202

Who we are

Who is providing this notice?	WASHINGTON HARBOUR PARTNERS, LP
What we do	
How does WASHINGTON HARBOUR PARTNERS, LP 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 WASHINGTON HARBOUR PARTNERS, LP collect my personal information?	<p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> • Request information on the https://washingtonharbour.com website • Apply to open an account with us • Subscribe for interests in funds managed by us <p>We also collect your personal information from others, such as such as fund administrators, identity verification and “know your customer” service providers, affiliates, or other companies.</p>
Why can’t I limit all sharing?	<p>Federal law gives you the right to limit some but not all sharing related to:</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 nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>
What happens when I limit sharing for an account I hold jointly with someone else?	Your choices will apply to everyone on your account—unless you tell us otherwise.
Definitions	
Affiliates	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <p>Our affiliates include Towards WASHINGTON HARBOUR PARTNERS, LP LLC.</p>
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies.
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you.
Other important information	
<p>Do not call policy. This notice is our Do Not Call Policy under the Telephone Consumer Protection Act. We do not solicit via telephone numbers listed on the state or federal Do Not Call lists, unless the law allows. Our employees receive training on how to document and process telephone marketing choices. Consumers who ask not to receive telephone solicitations from us will be placed on our Do Not Call list and will not be called in future campaigns, including those of our affiliates.</p>	
<p>Call Monitoring and Recording. If you communicate with us by telephone, we may monitor or record the call.</p>	
<p>For Nevada residents only. We are providing you this notice under state law. You may be placed on our internal Do Not Call List by following the directions in the To Limit Our Sharing section. Nevada law requires we provide the</p>	

following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Suite 3900, Las Vegas, NV 89101; Phone number: 702.486.3132; email: aginfo@ag.nv.gov;

For California residents only. The California Consumer Privacy Act (CCPA) gives California residents certain rights concerning defined non-public “personal information”.

Categories of information collected include:

- Identifiers.
- Personal information categories listed in the California Customer Records statute (Cal. Civ. Code Section 1798.0(e)).

In the preceding twelve (12) months, we have disclosed identifiers and personal information categories to contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.

In the preceding twelve (12) months, we have not sold any of your personal information.

The CCPA provides California users with specific rights regarding their personal information including:

- **Access to Specific Information and Data Portability Rights.** You have the right to request a statement about our collection of your personal information over the past twelve (12) months. Upon receipt of a verifiable user request, we will disclose to you the categories of personal information collected, our business or commercial purpose for collecting that information, any third-parties who we have disclosed such information if we sold or disclosed any personal information for a business or commercial purpose.
- **Deletion Request Rights.** You have the right to request that we delete your personal information, subject to certain exceptions. Upon receipt of a verifiable user request, we will delete (and direct any third parties who we have disclosed such information to delete) your personal information from our records, unless an exception applies. We may deny your deletion request if retention of the information is required for us to complete the transaction for which we collected the personal information, detect, protect, and prosecute against illegal activity, debug and repair products, and comply with a legal obligation.
- California’s “**Shine the Light**” law (Civil Code Section § 1798.83) permits users of the Website that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes.

To exercise any of the rights specified above, please submit a verifiable user request to us by emailing us at ops@washingtonharbour.com or call us at: (202) 891-6202. Please provide sufficient information that allows us to reasonably verify you are the person from whom we collected personal information, and describe your request sufficiently for us to understand, evaluate, and respond to it. We cannot respond to the request if we are unable to verify your identity and confirm the personal information relates to you. We will respond to a verifiable user request within forty-five (45) days of receipt by mail or electronically, including any basis for denial of a request to delete. If we require additional time to respond (up to ninety (90) days), we will inform you of the reason and extension in writing to the email connected to your user account.

Residents of California, New Mexico, North Dakota, and Oregon. We will not share information we collect about you with nonaffiliates, unless the law allows. For example, we may share information with your consent, to service your accounts, or to provide rewards or benefits you are entitled to. We will limit sharing among our companies to the extent required by law.

Other Important Information For Vermont Customers. We will not disclose information about your creditworthiness to our affiliates and will not disclose your personal information, financial information, credit report, or health information to nonaffiliated third parties to market to you, other than as permitted by Vermont law, unless you authorize us to make those disclosures. For additional information concerning our privacy policies email us at: ops@washingtonharbour.com .

For EU Customers.

WASHINGTON HARBOUR PARTNERS, LP is the Controller/Processor for purposes of the General Data Protection Regulation (“**GDPR**”). If you are a resident of the European Union, you have the rights under this privacy policy and by law, to:

- Access Your Personal Data. You have the right to obtain a copy of the information collected by us.
- Rectification. You have the right to request the modification of your information, including the correction of errors and updating of incomplete information.
- Erasure. You have the right to deletion or removal of your personal information from the Website or any other records in which it is stored when such information is no longer necessary in relation to the purpose it was collected. You also have the right to request deletion where you have exercised your right to object to processing.
- Restrict Data Processing. You have the right to request that all processing of your information be stopped to (1) contest the accuracy of such information; (2) where such information processing is unlawful; (3) where the Controller/Processor no longer needs the information for processing, (4) or where you have exercised your right to object to processing.
- Notification. You have the right to be notified about the uses of your personal information including any rectification, erasure, or restriction of processing.
- Data Portability. You have the right to receive the personal information provided to us through automated means, in a structured, commonly used machine-readable format, or to have that information transmitted to another controller.
- Objection. You have the right to object to the processing of your personal information where we are relying on legitimate interest as the legal basis for our processing and there is something about your particular situation, which makes you want to object to the processing of your information. You also have the right to object where personal information is processed for direct marketing purposes.
- Reject Automated Individual Decision-Making. You have the right not to be subject to a decision based solely on automated processing, including profiling unless subject to the creation or performance of a contract or such processing is based on your explicit consent.
- Withdraw Consent. You have the right to withdraw consent where we are relying on consent to process your information. If you withdraw consent, we may not be able to provide you with full access to the Website or services related to its functionalities. We will provide you with a notification at the time you withdraw consent.

You will not have to pay a fee to access your personal information or to exercise any of the rights. We may, however, charge a reasonable fee if your request is manifestly unfounded, repetitive or excessive, or we may refuse to act upon the request.

To exercise the rights specified above or submit a complaint, please submit a verifiable user request to us by emailing us at ops@washingtonharbour.com. Please provide sufficient information that allows us to reasonably verify you are the person from whom we collected personal information, and describe your request sufficiently for us to

understand, evaluate, and respond to it. We cannot respond to the request if we are unable to verify your identity and confirm the personal information is yours. We will respond to a verifiable user request within thirty (30) days of receipt by mail or electronically, including any basis for denial of a request. If we require additional time to respond, we will inform you of the reason and extension in writing. If you have submitted a complaint and feel that it has not been adequately resolved, you have the right to contact your local data protection supervisory authority.

Personal Information from Children under the Age of 18

We do not knowingly collect personal information from children under 18. If we learn we have collected or received personal information from a child under 18 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 18, please contact us as indicated above.

2 Accessing and Correcting Your Information

You can review and change various portions of your personal information by logging into the Website and visiting your user/investor account profile(s). You may also send us an email at ops@washingtonharbour.com or call us at: (202) 891-6202 to request access to, correct, or delete any personal information that you have provided to us. We cannot delete your personal information except by also deleting your user account(s). We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your user account(s) from the Website, copies of your account information may remain viewable in cached and archived pages, in archived pages related to fund investments, or that might have been copied or stored by other Website users. Proper access and use of information provided on the Website, including user or third-party posting, is governed by our [\[Terms of Use\]](#).

3 Data Security

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. The use of, and access to, your personal information by us is restricted to employees and third parties who need to know that information to provide services to you. All information you provide to us is stored on our secure servers behind firewalls. Personal information will be encrypted using industry-standard encryption mechanisms.

The safety and security of your information also depend on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

As part of your user account, you may authorize any number of users to view your information with both the right to invite and revoke these permissions at any time. Customers are encouraged to secure their profiles via two-factor authentication.

4 Changes to Our Privacy Policy

It is our practice to post any changes we make to this policy with a notice on the date it was last revised identified at the top. If we make material changes to how we treat our users' personal information, we will notify you by email to the primary email address connected with your user account and/or through a notice on the Website home page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting the Website and this privacy policy to check for any changes.

Leave Blank OR	Mark any/all types of personal information that you want to limit:		
If you have a joint account, your choice(s) will apply to everyone on your account unless you mark below.	<input type="checkbox"/> Do not share information about my creditworthiness with your affiliates for their everyday business purposes. <input type="checkbox"/> Do not allow your affiliates to use my personal information to market to me. <input type="checkbox"/> Do not share my personal information with nonaffiliates to market their products and services to me.		
<input type="checkbox"/> Apply my choices only to me	Name		WASHINGTON HARBOUR PARTNERS, LP
	Address		1201 Wilson Blvd Suite 2210
	City, State, Zip		Rosslyn, VA 22209
	Account #		