

PRIVACY NOTICE FOR CALIFORNIA CONSUMERS

Last updated: March 2023

This notice contains disclosures required by the California Privacy Rights Act ("CPRA"). Terms defined in the CPRA have the same meaning when used in this notice. This notice is only relevant to California residents ("consumers" or "you").

Information We Collect. In the past 12 months, we have collected and shared for a business purpose the following categories of personal information ("Personal Information"):

Category	Examples	Collected	Shared for Business Purpose
A. Identifiers	A real name, alias, email address, postal address, Internet Protocol (IP) address, account name, Social Security number, driver's license number, passport number, or other similar personal identifiers.	YES	YES
B. Other personal information categories, as listed in the California Customer Records Statute	A signature, physical characteristics or description, telephone number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information.	YES	YES
C. Protected classification characteristics under California or federal law	Age (40 years or older), race, citizenship, marital status, sex, veteran or military status.	YES	YES
D. Commercial information	Account activity, records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES	YES
E. Biometric information	Fingerprints, faceprints, voiceprints, and iris or retina scans.	NO	NO

F. Internet or other similar network activity	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.	YES	YES
G. Geolocation data	Physical location or movements.	YES	YES
H. Sensory data	Audio, electronic, visual, thermal, olfactory, or similar information.	NO	NO
I. Professional or employment-related information	Current or past job history or performance evaluations.	YES	YES
J. Non-public education information (per the Family Educational Rights and Privacy Act)	Education records directly related to a student maintained by an educational institution or party acting on its behalf.	NO	NO
K. Inferences drawn from other personal information	Profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.	NO	NO
L. Sensitive personal information	A consumer's SS, driver's license, state ID card, or passport number; account log-in or debit/credit card number in combination with any access code, password, or account credentials; precise geolocation; racial/ethnic origin, religious/philosophical beliefs, or union membership; contents of mail, email, and text messages; genetic data; biometric information; PHI; or sex life or sexual orientation.	YES	YES

Personal Information does not include information that is publicly available, de-identified/ aggregated, or subject to HIPAA or GLBA.

We collect Personal Information from the following categories of sources:

- Your communications with us;
- By observing your actions on our website;

- Service providers, including, but not limited to: administrators, lenders, banks, brokers, auditors, law firms, consultants, placement agents, employment agencies, credit bureaus, or other providers that collect your data on our behalf;
- Affiliates not under the Pantera Capital brand;
- Portfolio companies;
- Nonprofit organizations; and
- Government entities.

We do not knowingly collect, solicit or sell Personal Information from anyone under the age of 18.

Purpose for Collection and Use of Personal Information. We may collect or use Personal Information for one or more of the following purposes:

- Providing you with information about our products and services;
- Providing you with performance and other updates;
- One or more of the following business purposes:
 - Performing services (for us or our service provider or contractor) such as account servicing, processing orders and payments, and analytics;
 - Auditing related to our interactions with you (e.g., counting ad impressions to unique visitors, verifying positioning/quality of ad impressions, and auditing compliance, etc.);
 - Legal compliance;
 - Detecting and protecting against security incidents, fraud, and illegal activity;
 - Debugging;
 - Internal research for technological improvement;
 - Internal operations;
 - Activities to maintain and improve our services; and
 - Short-term, transient use, such that the personal information is not disclosed to another third party and is not used to build a profile about you;
 - Other commercial purposes, including, but not limited to: includes activities that are directed to advancing a commercial or economic interests, such as inducing a person to buy, rent, lease, join, subscribe to, provide or exchange products or services, or enabling or effecting a commercial transaction.

Sharing Personal Information. We may disclose Personal Information to:

- Service providers, including but not limited to: administrators, lenders, banks, brokers, auditors, law firms, consultants, placement agents, employment agencies, credit bureaus or other providers that collect your data on our behalf;
- Affiliates;
- Business partners;
- Legal or government regulatory authorities as required by applicable law;
- In connection with a potential business transfer; and
- Third parties to whom you or your agents authorize us to disclose such information in connection with services we provide to you.

In the past 12 months, we have not sold Personal Information to third parties.

Length of Time. We will keep your Personal Information for as long as necessary to comply with our regulatory obligations.

Rights of California Consumers. The CPRA provides a California consumer the following rights, subject to certain exceptions and limitations:

- The right to request: (a) the categories and specific pieces of Personal Information we collect about you; (b) the categories of sources from which we collect your Personal Information; (c) our business or commercial purposes for collecting, selling or sharing your Personal Information; (d) the categories of Personal Information disclosed for a business purpose and the categories of persons to whom it was disclosed; (e) the categories of your Personal Information (if any) that we have either sold, shared, or disclosed.
- For certain categories of Personal Information, the right to request a list of what we disclosed to third parties for their own direct marketing purposes in the past 12 months and the names and addresses of those third parties.
- The right to request that we delete your Personal Information, subject to certain exceptions.
- The right to opt out of our sale(s) (if any) of your Personal Information.
- The right to request we correct any inaccurate Personal Information maintained about you.
- The right to limit our use of your sensitive personal information to only use that is necessary to perform the services expected or provide the goods reasonably expected.
- The right not to receive discriminatory treatment for exercising your CPRA rights.

You may submit requests relating to your exercise of CPRA rights to us via:

Phone 650-852-1700;

or

email legal@panteracapital.com

or

via online form available here: <https://www.panteracapital.com/contact>.

You may only make a verifiable request for access or data portability twice within a 12-month period. All verifiable requests must provide (1) enough information that allows us to reasonably verify you are the person about whom we collected Personal Information or an authorized representative and (2) sufficient detail that allows us to properly evaluate and respond to it.

We endeavor to respond to a verifiable request within 45 days of its receipt. If we require more time, we will inform you of the reason and extension period in writing. We will deliver our written response by mail or electronically, at your option.

Questions

If you have questions regarding this Notice, please contact us at legal@panteracapital.com.