

WARBURG PINCUS PRIVACY NOTICE

Warburg Pincus' commitment to data privacy principles

This Privacy Notice is provided by Warburg Pincus LLC and its affiliates listed in *Appendix 1* (“Warburg Pincus”, “we”, “our”, and “us”). We are firmly committed to ensuring compliance with our data protection obligations. Through this Privacy Notice, we wish to inform you about the ways in which we interact with individuals (“Data Subjects”) in connection with our business and describing in general terms how we collect, use, store, process, disclose and transfer information that we may collect from Data Subjects. For the purpose of this Privacy Notice, Data Subjects may include, without limitation:

- Employees, contractors, consultants, and other representatives of Warburg Pincus;
- Candidates for employment at Warburg Pincus;
- Investors in Warburg Pincus Funds, including but not limited to registered users of our Investor Reporting Portal;
- Prospective Investors in Warburg Pincus Funds and their representative agents;
- Visitors to our website;
- Directors, officers, employees, and other representatives of portfolio companies in which we have invested or are considering making an investment;
- Individual representatives of third-party sellers, placement agents, deal finders, investment bankers, consultants, accountants, advisers, lawyers, and other service providers, whether engaged or not by Warburg Pincus.

This Privacy Notice will be updated from time to time in order to reflect any changes to the data privacy laws or changes to our practices. We will also issue additional notices to certain categories of Data Subjects.

1. Collection of Personal Data and/or Information

Personal Data as defined under the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 (“GDPR”) is any information relating to an identified or identifiable natural person. Personal Information as defined under the California Consumer Privacy Act, as amended (“CCPA”), is any information that identifies, relates

to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

1.1 Types of Personal Data collected

During the course of regular business, we collect (purposefully or incidentally) many types of Personal Data, including but not limited to the following:

- Identification information (e.g., name, passport number, national ID number, nationality, place and date of birth, gender, your image, IP address);
- Contact information (e.g., residence / mailing address, personal / professional email address, phone numbers);
- Family situation (e.g., marital status, number of dependents, number of children);
- Tax status (e.g., tax identification number, tax residence, tax jurisdiction);
- Education and Employment information (e.g., level of education, employment history, employers' names, salary information);
- Financial data (e.g., bank account details, wire instructions, money transfers, your financial advisor information, investor profile, credit history);
- Background data (e.g., criminal history, unlawful conduct)

1.2 Categories of Personal Information collected

During the course of regular business, we may collect the following categories of Personal Information:

- Identifiers and Contact Information. This category includes names, addresses, telephone numbers, mobile numbers, email addresses, signatures, account names, dates of birth, bank account information, and other similar contact information and identifiers.
- Protected Classification Information. This category includes characteristics of protected classifications under California or federal law.
- Commercial Information. This category includes, without limitation, products and services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.

- Education Information. This category includes, without limitation, information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. section 1232g, Sec. 1232g; 34 C.F.R. Part 99).
- Internet or Other Electronic Network Activity Information. This category includes, without limitation, browsing history, search history, or a consumer's interactions with a website, application, or advertisement.
- Geolocation Data. This category includes, without limitation, location information collected when using one of our apps, devices, or vehicles.
- Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information. This category includes, without limitation, information collected from voicemail messages, while speaking with one of our service representatives, and/or by video camera.
- Biometric Information. This category includes, without limitation, an individual's physiological, biological, or behavioral characteristics used or intended for use – singly or in combination with each other or with other identifying data – to establish individual identity.
- Professional and Employment-Related Information. This category includes, without limitation, information regarding job applications, information related to onboarding for payroll and benefits, and information needed for evaluating performance.
- Sensitive Personal Information. This category includes:
 - social security, driver's license, state identification card, or passport number;
 - log-in, financial account, debit card, or credit card number, in combination with any required security or access code, password, or credentials allowing access to an account;
 - precise geolocation;
 - racial or ethnic origin, religious or philosophical beliefs, or union membership;
 - content of mail, email, and text messages (unless we are the intended recipient of the communication);
 - genetic data;

- o biometric information;
 - o health information; and
 - o information regarding sex life or sexual orientation.
- Consumer Profile. This category includes information drawn from any of the categories above to create a profile about a consumer reflecting the consumer's preferences, characteristics, and behaviors.

1.3 Means of collecting Personal Data and/or Information

- Personal Data and/or Information provided by the Data Subject (e.g., you provide us with the information as a candidate for employment or consultant role; as an employee; as a potential or existing investor; as a visitor to our website);
- Personal Data and/or Information obtained from other sources (e.g., from public records, bankruptcy registers, tax authorities, government and competent regulatory authorities, credit agencies, fraud prevention and detection agencies and organizations).

1.3 Cookies

In addition to the means described under 1.2 above, we automatically collect certain data from Data Subjects who visit our external website www.warburgpincus.com by using cookies. Cookies are files or parts of files stored on any machine connected to the internet that contain personal information such as IP address, customized preferences, or a record of your browsing history. Through the use of cookies, we are able to track certain statistics such as the number and frequency of visitors to our external website. Our separate [Website Privacy Notice](#) provides a detailed description of how we use Cookies.

2. Use of Personal Data and/or Information

We use your Personal Data and/or Information for business purposes, including, but not limited to:

- Compliance with various legal and regulatory obligations (e.g., Know-Your-Client and Anti-Money Laundering laws and regulations, the Foreign Corrupt Practices Act, the UK Bribery Act 2010, as well as various rules and regulations imposed on us by the SEC from our role as a registered Investment Adviser, such as the Pay-to-Play Rule);
- Legitimate purpose (e.g., communications with you, the Data Subject, or your representatives and agents appointed by you; performance of activities relating to client management, financial management, and administration of the funds; legal disputes; monitoring and auditing compliance with internal policies and procedures, legal obligations and requirements and orders of regulatory authorities; consideration of applications for employment or an investment into our funds that will include evaluation of your suitability and accuracy of any information submitted);
- Performing a contract with you, the Data Subject, in furtherance of your employment or your status as an investor.

3. Sharing Personal Data and/or Information

3.1 Internal sharing

Within Warburg Pincus we share Personal Data and/or Information for legitimate business purposes. With respect to Personal Data: In order to afford you the same protection in the jurisdictions outside of the EU, Warburg Pincus' global offices have signed agreements adopting the principals of GDPR, which shall govern your Personal Data unless such agreements conflict with national law in which case, the national law shall prevail.

3.2 External sharing

We share Personal Data and/or Information with third parties, when they are acting as Service Providers that perform services on our behalf (e.g., hosting service for our website, investor portal). These service providers may have access to your Personal Data and/or Information but will process your data only on the basis of the contract with the scope of processing limited by the contract and bound by confidentiality of the contract. A Transaction / Corporate Event may reveal your Personal Data and/or Information in pursuit of execution of corporate transactions, when you act as a representative of our firm or are a party to an agreement, such as a merger, acquisition, joint venture, financing, or sale of Portfolio Company. Your Personal Data and/or Information may also be disclosed in the event of insolvency, bankruptcy, or receivership. Legal Requirement may compel us to disclose your Personal Data and/or Information in order to make disclosures required by applicable law to the government or private parties in connection with a lawsuit, subpoena, investigation, or legal proceeding, or as part of our legislative and / or regulatory reporting.

4. Protection of Personal Data and/or Information

We take our data protection and information security responsibilities very seriously and are committed to the protecting of your Personal Data and/or Information. We have policies and procedures that govern access to your Personal Data and/or Information. We make all reasonable efforts to ensure that (i) all Personal Data and/or Information is kept secure and safe from loss or unlawful or unauthorized destruction, alteration, access, disclosure, or use, and (ii) that any Personal Data and/or Information held by us is stored in a secure and safe place, and only accessible by persons, who have a legitimate business or need to know (whether Warburg Pincus employees or third parties).

If you are located outside of the United States, please be aware that the Personal Data we collect may be processed and stored in the United States or other jurisdiction in which the data protection and privacy laws may be less stringent as those in the country where you reside or are a citizen of. To extend the level of protection regarding Personal Data, we have executed a series of agreements between our global affiliates and our European offices that adopt the principals outlined in the GDPR.

5. Keeping your Personal Data accurate and up to date

In general, we seek to ensure that we keep your Personal Data accurate and up to date. This entails taking all reasonable measures to ensure that inaccurate Personal Data, having regard to the purposes for which they are processed, are erased, or rectified without delay. Nonetheless, you are responsible for any changes to your Personal Data (such as a change in your contact details). Please contact us by sending an e-mail to PersonalData@warburgpincus.com in case you want to update or edit your Personal Data that we have on file, including your communication preferences.

6. Timeframe for retaining Personal Data and/or Information

In general, we will process and store your Personal Data and/or Information for as long as it is necessary in order to fulfill our contractual, regulatory, and statutory obligations, and/or to provide you services, process your application for employment, or manage your employment with us. Our goal is to keep Personal Data and/or Information for no longer than is necessary for the purposes for which the Personal Data and/or Information is processed. Personal Data and/or Information will be kept in accordance with our data retention policies. To determine the appropriate retention period for your Personal Data and/or Information, we consider various factors, such as the amount, nature, and sensitivity of your information; the potential risk of unauthorized access, use or disclosure; the purposes for which we collect or process your information; and applicable legal requirements. In some instances, we retain your Personal Data and/or Information in a deidentified or aggregated form so that it can no longer be associated with you. In case you have any questions in relation to our data retention policies, please contact us by sending an e-mail to PersonalData@warburgpincus.com.

7. Data Subjects who are Residents of the European Economic Area (the “EEA”) and the General Data Protection Regulation (EU) 2016/679 of the European Parliament and of the Council of 27th April 2016 (“GDPR”)

Warburg Pincus LLC is headquartered at 450 Lexington Avenue, New York, NY 10017, United States of America. As a data controller, we are accountable for deciding how we store, use, process and how long we keep your Personal Data.

and **7.1 GDPR Data Protection Principles govern the collection, holding, storage, use, and processing of your Personal Data and as such:**

- We will process the data lawfully, fairly and in a transparent way;
- We will obtain the data only for valid purposes that we described above and will not use the data in any way that is not compatible with those purposes;
- The data we collect will be relevant to the purposes we have told you about and limited only to those purposes;
- We will take steps to ensure that the data is accurate and kept up to date;
- Subject to applicable legal or other requirements; we will keep the data only as long as it is necessary;
- We will use appropriate technical and / or organizational measure to ensure security of the data.

7.2 Transfer of Personal Data outside of the EEA

The transfer of Personal Data from and to our affiliates located in the UK/EEA is governed by agreements which incorporate the principals of GDPR, and the execution of Standard Contractual Clauses approved by the European Commission.

In case Personal Data is processed on our behalf by third parties outside the UK/EEA, we will ensure appropriate safeguards are in place to adequately protect it, as required by applicable law, including adoption of GDPR principles and execution of Standard Contractual Clauses if the recipients are not located in a country with adequate data protection laws (as determined by the European Commission).

7.3 Data Subject's rights under GDPR

GDPR grants an EEA-resident Data Subjects certain individual rights with the respect to the Personal Data that our firm can hold about them. These include:

- the right to request access to your personal information and obtain a copy of the information we hold about you;

- the right to correct your personal information that we hold where it is incomplete or inaccurate;
- the right to have your personal information erased where there is no good reason for us continuing to use or retain it;
- the right to request that your personal information is used only for restricted purposes;
- if the lawful basis for processing your personal information is either our or a third party's legitimate interests, the right to object to your personal information being processed;
- the right to require certain parts of your personal information to be transferred to you or a third party;
- the right to withdraw consent, at any time, to our use of your personal information where our use is based solely on your consent; and
- the right to lodge a complaint with the relevant data protection authority in your jurisdiction (for example, the Information Commissioner's Office in the United Kingdom).

In order to exercise these rights please contact PersonalData@warburgpincus.com. Although, we will not charge you a fee to access your Personal Data or exercise any of your rights under GDPR, we reserve the right to charge you a reasonable fee if your request for access is clearly unfounded or excessive.

7.4 Automated decision-making process

During our regular course of business, we do not utilize automated decision making as described by GDPR. However, under our current legal and regulatory obligations to combat money laundering, terrorism financing, and offenses that pose a danger to our clients and assets under our management, we may process some of your Personal Data automatically with a goal of assessing certain personal aspects as outlined by those legal and regulatory measures.

8. Data Subjects who are Residents of California

This section applies only to California residents. It supplements and amends the information contained in this Privacy Notice with respect to California residents. The other provisions of the Privacy Notice continue to apply, except as modified in this section.

8.1 Shine the Light

California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your Personal Information by us to third parties for the third parties' direct marketing purposes. Such requests must be submitted to us in accordance with the instructions in the Contact Us section of this Privacy Notice. Please mention when contacting us that you are making a "California Shine the Light" inquiry. Within 30 days of receiving such a request, we will provide a list of the categories of Personal Information disclosed to third parties for third-party direct marketing purposes during the immediately preceding calendar year, along with the names and addresses of these third parties. This request may be made no more than once per calendar year. We reserve our right not to respond to requests submitted other than in accordance with the instructions specified in this paragraph.

8.2 Eraser Law

If you are a California resident under the age of 18, and a registered user of any site where this policy is posted, California law permits you to request and obtain removal of content or information you have publicly posted. You may submit your request using the contact information at the end of this Privacy Notice. Please be aware that such request does not ensure complete or comprehensive removal of the content or information you have posted and that there may be circumstances in which the law does not require or allow removal even if requested.

8.3 CCPA

The following provisions describe our policies and practices regarding the collection, use, and disclosure of Personal Information, including information we obtain when you access or use our website or through other channels (e.g., phone and email conversations, when you visit our locations or attend our events, or through our authorized services providers), in accordance with the CCPA. Any terms defined in the CCPA have the same meaning when utilized in this section. The other provisions of the Privacy Statement continue to apply except as modified herein.

Please read this section carefully before using our website or submitting Personal Information to us. By accessing or visiting our website, or submitting Personal Information to us, you indicate your understanding that the collection, use, and sharing of your Personal Information is subject to the terms of this section. Except as otherwise noted, any capitalized terms not defined in this section have the meaning set forth in the Privacy Notice.

Consumer Rights

If you are a California resident, you may have certain rights related to your Personal Information, subject to certain exceptions. Specifically:

- *Right to Know.* You have the right to request that we disclose the following to you upon receipt of your verifiable consumer request:
 - The categories of Personal Information we have collected about you
 - The categories of sources from which we collected that information
 - The business or commercial purposes for collecting, selling, or sharing that information
 - The categories of Personal Information we sold or disclosed for a business purpose
 - The categories of third parties to whom we sold or disclosed that information
 - The specific pieces of Personal Information we collected about you
- *Right to Delete.* You have the right to request that we delete your Personal Information from our records, subject to certain exceptions. Upon receipt of a verifiable consumer request, and as required by the CCPA, we will delete and direct any service providers to delete your Personal Information. We are not required to comply with deletion requests if we, or our service providers or contractors, need the subject information in order to:
 - Complete the transaction for which the Personal Information was collected, provide a good or service requested by you or reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform a contract between us and you.
 - Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for that activity.
 - Debug to identify and repair errors that impair existing intended functionality.

- o Exercise free speech, ensure the right of another consumer to exercise their right of free speech, or exercise another right provided for by law.
 - o Comply with the California Electronic Communications Privacy Act pursuant to Chapter 3.6 (commencing with Section 1546) of Title 12 of Part 2 of the Penal Code.
 - o Enable solely internal uses that are reasonably aligned with your expectations based on your relationship with us and compatible with the context in which you provided the information to us.
 - o Comply with a legal obligation.
 - o Otherwise use your Personal Information, internally, in a lawful manner that is compatible with the context in which you provided the information.
- *Right to Correct.* You have the right, subject to certain limitations, to request that we correct any inaccurate Personal Information we maintain about you. Upon receipt of a verifiable consumer request, and as required by the CCPA, we will take appropriate steps to respond to your request.
 - *Right to Opt-Out of Selling or Sharing.* You have the right, subject to certain limitations, to opt-out of having your Personal Information sold or shared. However, we do not sell or share your Personal Information, as those terms are defined in the CCPA, and do not have actual knowledge that we have sold Personal Information of minors under age 16.
 - *Right to Limit Use or Disclosure of Sensitive Personal Information.* You have the right, subject to certain exceptions, to request that we limit the use and disclosure of your Sensitive Personal Information, as that term is defined in the CCPA. Upon receipt of a verifiable consumer request, and as required by the CCPA, we will take appropriate steps to respond to your request.
 - *Right Against Discrimination.* You have the right not to be discriminated against for exercising any of the rights described in this section. For example, we generally will not provide you a different level or quality of goods or services if you exercise these rights.

Submitting Consumer Rights Requests

To submit a consumer rights request, please contact us at toll-free number:

1-866-803-3661 between 9:00 a.m. and 6:00 p.m. Eastern Time, via an online form: <https://www.warburgpincus.com/personal-information-request/>, or email us at the following email address: PersonalData@warburgpincus.com.

Verification. We reserve the right to only respond to verifiable consumer requests. A verifiable consumer request is one made by:

- the consumer who is the subject of the request,
- a consumer on behalf of the consumer's minor child, or
- a natural person or business entity authorized to act on behalf of a consumer.

To verify your identity, we may ask you to verify Personal Information we already have on file for you. If we cannot verify your identity from the information we have on file, we may request additional information from you, which we will only use to verify your identity, and for security or fraud-prevention purposes. Making a verifiable consumer request does not require you to create an account with us. Additionally, you will need to describe your request with sufficient detail to allow us to review, understand, assess, and respond.

Authorized Agents. You may authorize a natural person or business entity to act on your behalf with respect to your rights under this section. Unless you have provided the authorized agent with a qualifying power of attorney, you must provide your authorized agent written permission, signed by you, to act on your behalf and verify the authorized agent's identity with us. We reserve the right to deny requests from persons or businesses claiming to be authorized agents that do not submit sufficient proof of their authorization. We may not be able to respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Our Response. We reserve the right to charge a fee to process or respond to your request if it is excessive, repetitive, or manifestly unfounded. If we determine that a request warrants a fee, we will attempt to notify you as to why we made that decision and provide a cost estimate before completing your request. We will endeavor to respond to a verifiable consumer request within forty-five (45) calendar days of receipt, but we may require an extension of up to forty-five (45) additional calendar days to respond and we will notify you of the need for the extension. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option. Any disclosures we provide will only cover the 12-month period preceding the receipt of your verifiable consumer request. With respect to Personal Information collected on and after January 1, 2022, and to the extent expressly permitted by applicable regulation, you may request that such disclosures cover a period beyond the 12 months referenced above, provided doing

so would not be impossible or require a disproportionate effort by us. The response we provide will also explain the reasons we cannot comply with a request, if applicable. To the extent permitted by the CCPA, we will respond to no more than two requests during any 12-month period.

8. Contact us

Questions, comments, requests, and complaints regarding this Privacy Notices and/or use of your Personal Data and/or Information should be addressed to PersonalData@warburgpincus.com. Any Personal Data and/or Information you provide us by filing a complaint will be treated in accordance with this Privacy Notice and only processed in review of your complaint.

Appendix 1

Warburg Pincus LLC

Address: 450 Lexington Avenue, New York, NY 10017, USA

Warburg Pincus (Texas) LLC

Address: 4400 Post Oak Parkway, Suite 1900, Houston, TX 77027, USA

Warburg Pincus S.a R.L.

Address: 46 A, Avenue J.F. Kennedy, L-1855 Luxembourg

Warburg Pincus Asia LLC

Address: Two International Finance Centre, 8 Finance Street, Suite 6703, Hong Kong

Warburg Pincus Asia Ltd

Address: 8th Floor, Newton Tower, Sir William Newton Street, Port Louis, Mauritius;

Email Address: wp@iqeq.com

Warburg Pincus do Brasil Ltda.

Address: Avenida Brigadeiro Faria Lima 2277, 9º andar, Jardim Paulistano, 01451-001, São Paulo–SP, Brazil

Warburg Pincus B.V.

Address: Atrium, Strawinskylaan 3051, 1077 ZX Amsterdam, The Netherlands

Warburg Pincus Deutschland GmbH

Address: Fasanenstrasse 65, 10719 Berlin, Germany

Warburg Pincus India Private Limited

Address: 7th Floor Express Towers, Nariman Point, Mumbai 400 021, India

Warburg Pincus International LLC

Address: 28 King Street, St. James, SW1Y 6QW London, United Kingdom

Beijing Warburg Pincus Investment Consulting Company Limited

Address: 26/F, China World Tower A, 1 Jianguomenwai Avenue, Beijing 100004, China

Warburg Pincus Singapore Pte. Ltd

Address: 50 Collyer Quay, #06-04, OUE Bayfront (Level 6), Singapore 049321, Singapore