

## *Privacy Notice*

March 2020

### **FACTS**

### **WHAT DOES SYCAMORE PARTNERS (“SYCAMORE”) DO WITH YOUR PERSONAL INFORMATION?**

<b>WHY?</b>	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.	
<b>WHAT?</b>	The types of personal information we collect and share depend on the product or service you have with us. This information can include: <ul style="list-style-type: none"> <li>• Name, address and identifying numbers (including your social security number)</li> <li>• Income</li> <li>• Assets</li> <li>• Transaction history</li> <li>• Wire Transfer Instructions</li> </ul>	
<b>HOW?</b>	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 Sycamore chooses to share; and whether you can limit this sharing.	
<b>Reasons we can share your personal information</b>	<b>Does Sycamore Share?</b>	<b>Can you limit this sharing?</b>
<b>For our everyday business purposes</b> - such as to process your transactions, maintain your accounts(s) or respond to court orders and legal investigations.	Yes	No
<b>For our marketing purposes</b> - to offer our products and services to you	No	We don’t share
<b>For joint marketing with other financial companies</b>	No	We don’t share
<b>For our affiliates’ everyday business purposes</b> - information about your transactions and experiences	Yes	No
<b>For our affiliates’ everyday business purposes</b> – information about your creditworthiness	No	We don’t share
<b>For nonaffiliates to market to you</b>	No	We don’t share
<b>Questions?</b>	Call our Chief Compliance Officer, Carla Vogel , at 212-796-8544	
<b>What we do</b>		
<b>How does Sycamore protect my personal information?</b>	At Sycamore, we recognize the importance of keeping information about you secure and confidential. 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.	

<b>How does Sycamore collect my personal information?</b>	<p>We collect your personal information in various ways. Examples include:</p> <ul style="list-style-type: none"> <li>• Submitting Subscription Agreements and other investor onboarding documentation</li> <li>• Entering into an investment advisory contract</li> <li>• Providing requisite wire transfer instructions to facilitate capital calls, distributions or other associated transactions in connection with your Sycamore Fund investment</li> <li>• Providing your employment history</li> <li>• From consumer credit reporting agencies or other nonaffiliated third parties, to verify information received from you or others</li> </ul>
<b>Why can't I limit all sharing?</b>	<p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>• sharing for affiliates' everyday business purposes—information about your creditworthiness</li> <li>• affiliates from using your information to market to you</li> <li>• sharing for nonaffiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing.</p>
<b>Information About Our Former Customers</b>	<p>We do not disclose non-public personal and financial information about former customers to nonaffiliates unless required or requested to do so by a court order, judicial subpoena or regulatory inquiry, or otherwise where we believe in good faith that disclosure is required or permitted by law.</p>
<b>Definitions</b>	
<b>Affiliates</b>	<p>Companies related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• <i>Our affiliates include companies with a common corporate identity</i></li> </ul>
<b>Nonaffiliates</b>	<p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>• <i>Sycamore does not share with nonaffiliates so they can market to you.</i></li> </ul>
<b>Joint Marketing</b>	<p>A formal agreement between nonaffiliated financial companies that together market financial products or services to you.</p> <p><i>Sycamore does not jointly market.</i></p>

## *Supplement for EU Investors*

We are providing this Supplemental Notice to you to comply with the requirements of Regulation (EU) 2016/679 (“GDPR”) which is an EU law which regulates the handling of personal information about individuals.

### **Your Rights**

Subject to certain conditions and limitations provided for by applicable law, you have the right:

- i. to access and receive a copy of the personal information we hold about you, free of charge, with a time limit of one month to respond;
- ii. to rectify any personal information held about you that is inaccurate or incomplete;
- iii. to request the erasure of personal data held about you without undue delay when the use or other processing of such personal data is no longer necessary for the purposes for which it was collected or otherwise processed, and in certain other circumstances;
- iv. to restrict the processing of your personal data by us; and
- v. to request receipt or transmission to another organization, in a machine-readable form, of the personal information data that you have provided to us where we are using your personal data.

From time to time we may ask you to confirm the accuracy of your personal data.

### **Our lawful basis for processing your Personal Information**

We are obliged under the GDPR to specify the lawful basis on which we may process your personal information. Depending on the circumstances, the lawful basis will be because the processing is necessary either:

- i. for the purposes of the performance of contractual obligations with customers and consumers;
- ii. for compliance with legal and regulatory obligations, such as applicable company and financial laws and other legal obligations applicable to us; or
- iii. for the purposes of our legitimate interests, such as maintaining relations with customers; facilitating the on-going administration and operation of our business; marketing and promoting products and services; protecting against, identifying and preventing fraud and other unlawful activity; complying with requests from regulatory, law enforcement or other government agencies; and investigating and responding to complaints.

### **Further Information and Complaints**

You may request further information about the way we manage your personal information, make a request to exercise your rights or lodge a complaint by contacting our Privacy Officer on the contact details below.

You can contact us by calling us on +1 212.796.8544 or by writing to:

The Privacy Officer

C/O Chief Compliance Officer  
Sycamore Partners  
9 West 57<sup>th</sup> Street, 31<sup>st</sup> Floor  
New York, NY 10019

This is without prejudice to your right to file a complaint with the competent data protection authority in the EU member state in which you reside.

### **Retention Periods**

We will retain your personal data for as long as we reasonably require it for the purposes specified in this Privacy Notice, unless a longer period is required under applicable law or is needed to resolve disputes or establish, defend or exercise our legal rights. We will retain personal data for at least as long as our relationship continues, other than where we receive a valid request from you to delete your personal data. In determining data retention periods, we consider local laws, regulatory requirements and guidance, as well as contractual obligations and your reasonable expectations and requirements.

### **Transfers outside the European Economic Area**

Your personal information will be stored outside the European Economic Area, which may be in the USA or other countries which may not be considered by the European Commission to offer an equivalent level of protection of personal data as the level afforded in the European Union. Personal data transferred to countries outside of the EEA will, where possible, be protected by appropriate safeguards.

## ***Supplement for Cayman Investors***

This Supplemental Notice is being sent to you by and on behalf of the Cayman domiciled funds managed by Sycamore Partners and its affiliated and management entities ("**Sycamore**", "**we**" or "**our**"). We are providing this Supplemental Notice to you to comply with the requirements of Data Protection Law, 2017 of the Cayman Islands ("DPL") which regulates the handling of personal information about individuals and which apply to Cayman Islands funds.

In our use of investor data, the relevant Sycamore fund will be characterized as a "data controller" for the purposes of the DPL. The fund's affiliates and delegates may act as "data processors" for the purposes of the DPL.

### **Who this Affects**

If you are a natural person, this Supplemental Notice will affect you directly. If you are a corporate investor (including, for these purposes, legal arrangements such as trusts or exempted limited partnerships) that provides us with investor data on individuals connected to you for any reason in relation to your investment with us, this will be relevant for those individuals and you should transmit this document to such individuals or otherwise advise them of its content.

### **Your Rights**

Subject to certain conditions and limitations provided for by the DPL, you have certain rights, including:

- i. to access and receive a copy of the personal information we hold about you;
- ii. to rectify any personal information held about you that is inaccurate or incomplete; and
- iii. to restrict the processing of your personal data by us.

From time to time we may ask you to confirm the accuracy of your personal data.

### **Our lawful basis for processing your Personal Information**

We may collect, store and use personal information for lawful purposes, including, in particular:

- i. where this is necessary for the performance of our rights and obligations under the subscription agreement and/or the constitutional and operational documents of the fund;
- ii. where this is necessary for compliance with a legal and regulatory obligation to which we is subject (such as compliance with anti-money laundering and FATCA/CRS requirements); and/or
- iii. where this is necessary for the purposes of our legitimate interests and such interests are not overridden by your interests, fundamental rights or freedoms.

We may share your personal information with our service providers, including but not limited to lawyers, auditors, accountants, insurers, or back office service providers. They may either process personal data on our behalf or for their own lawful purposes in connection with services provided to us.

### **Further Information and Complaints**

You may request further information about the way we manage your personal information, make a request to exercise your rights or lodge a complaint by contacting our Privacy Officer on the contact details below.

You can contact us by calling us on +1 212.796.8544 or by writing to:

The Privacy Officer  
C/O Chief Compliance Officer  
Sycamore Partners  
9 West 57<sup>th</sup> Street, 31<sup>st</sup> Floor  
New York, NY 10019

This is without prejudice to your right to file a complaint with the Ombudsman of the Cayman Islands.

### **Retention Periods**

We will retain your personal data for as long as we reasonably require it for the purposes specified in this Privacy Notice, unless a longer period is required under applicable law or is needed to resolve disputes or establish, defend or exercise our legal rights. We will retain personal data for at least as long as our relationship continues, other than where we receive a valid request from you to delete your personal data. In determining data retention periods, we consider local laws, regulatory requirements and guidance, as well as contractual obligations and your reasonable expectations and requirements.

### **International Data Transfers**

Your personal information will be stored outside the Cayman Islands, which may be in the USA or other countries which may not be considered to offer an equivalent level of protection of personal data as the level afforded by the DPL. For the purposes of the DPL, where applicable, any transfer of personal data by us or our duly authorized affiliates and/or delegates to countries not having an adequate level of protection shall be in accordance with the requirements of the DPL.