

APPENDIX C - PRIVACY NOTICE

JUNE 2024

FACTS

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

WHY?	Financial companies choose how they share your personal information. Applicable U.S. federal law gives consumers the right to limit some but not all sharing. Such U.S. federal law, and other applicable U.S. and non-U.S. data protection and privacy laws also requires us to tell you how we collect, share, and protect your personal information. Please read this Privacy 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: <ul style="list-style-type: none"> ○ Name, address and identifying numbers (including your social security number) ○ Income ○ Assets ○ Transaction history ○ Wire Transfer Instructions
HOW?	All financial companies need to process and 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 under applicable U.S. law; whether Sycamore shares your personal information for such purposes; and whether you can limit this sharing. While we do not share your personal information with third parties to offer our products and services to you, we may keep you informed from time to time of other opportunities to make similar investments. You can opt out of receiving such marketing communications at any time by contacting our Chief Compliance Officer at 212-796-8544 or cvogel@sycamorepartners.com .

Reasons we can share your personal information	Does Sycamore Share?	Can you limit this sharing under applicable U.S. federal law?
For our everyday business purposes - such as to perform our contractual and legal obligations under the Subscription Agreement (including applicable anti-money laundering and know-your-customer obligations); to perform ongoing administrative, accounting, reporting and other processes and communications required to operate the business of the applicable Sycamore fund in accordance with applicable the partnership agreement(s) and other applicable documentation between the parties; to process your transactions; to maintain your accounts(s); or to respond to court orders and legal investigations.	Yes, with our affiliates, other investors, service providers, other contractual counter-parties and governmental authorities, as required for the specific business purpose	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	Yes, with our affiliates	No
For our affiliates’ everyday business purposes – information about your creditworthiness	No	We don’t share

For nonaffiliates to market to you	No	We don't share
Questions?	Call our Chief Compliance Officer at 212-796-8544	
What we do		
How does Sycamore protect my personal information?	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.	
How does Sycamore collect my personal information?	We collect your personal information in various ways. Examples include: <ul style="list-style-type: none"> ○ Submitting Subscription Agreements and other investor onboarding documentation ○ Entering into an investment advisory contract ○ Providing requisite wire transfer instructions to facilitate capital calls, distributions or other associated transactions in connection with your Sycamore fund investment ○ Providing your employment history ○ From consumer credit reporting agencies or other nonaffiliated third parties, to verify information received from you or others 	
Why can't I limit all sharing?	Applicable U.S. federal law gives you the right to limit only: <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 State or non-U.S. laws and individual companies may give you additional rights to limit sharing.	
Information About Our Former Customers	We do not disclose nonpublic 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.	
Definitions		
Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ○ Our affiliates include companies with a common corporate identity 	
Nonaffiliates	Companies not related by common ownership or control. They can be financial and nonfinancial companies. <ul style="list-style-type: none"> ○ Sycamore does not share with nonaffiliates so they can market to you. 	
Joint Marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. <ul style="list-style-type: none"> ○ Sycamore does not jointly market. 	

Privacy Notice Supplement for California Residents

This notice supplements the Privacy Notice set forth above with respect to specific rights granted under the California Consumer Privacy Act of 2018, as amended (the “**CCPA**”) to natural person California residents and provides information regarding how such California residents can exercise their rights under the CCPA. This supplement is only relevant to you if you are a resident of California as determined in accordance with the CCPA. Information required to be disclosed to California residents under the CCPA regarding the collection of their personal information that is not set forth in this CCPA supplement is otherwise set forth above in the Privacy Notice. To the extent there is any conflict with the privacy requirements under the Gramm-Leach-Bliley Act and/or Regulation S-P (“**GLB Rights**”), GLB Rights shall apply.

Categories and Disclosure of Personal Information We Collect: We collect from individuals the categories of personal information indicated in the chart below.

We do not share for the purpose of cross-context behavioral advertising or sell (as such terms are defined in the CCPA) any of the personal information we collect about you to third parties. We disclose personal information collected from you for a business purpose to the categories of third parties indicated in the chart below. We may also disclose your information to other parties as may be required by law or regulation, or in response to regulatory inquiries.

Category	Examples	Collected	Category of Third-Party Recipients
A. Identifiers	Name, contact details and address (including physical address, email address and Internet Protocol address), and other identification (including social security number, passport number and driver’s license or state identification card number).	YES	Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents.
B. Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e))	Telephone number, signature, bank account number, other financial information (including accounts and transactions with other institutions and anti-money laundering information), and verification documentation and information regarding investors’ status under various laws and regulations (including social security number, tax status, income and assets).	YES	Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents.
C. Protected classification characteristics under California or federal law	Date of birth, citizenship and birthplace.	YES	Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents.

D. Commercial information	Account data and other information contained in any document provided by investors to authorized service providers (whether directly or indirectly), risk tolerance, transaction history, investment experience and investment activity, information regarding a potential and/or actual investment in the applicable fund(s), including ownership percentage, capital investment, income and losses, source of funds used to make the investment in the applicable fund(s).	YES	Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents.
E. Internet or other similar network activity	Use of our website, fund data room and investor reporting portal (e.g., cookies, browsing history and/or search history), as well as information you provide to us when you correspond with us in relation to inquiries.	YES	Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents.
F. Sensitive Personal Information (see further information on use of sensitive personal information below)	Social security, driver's license, state identification card, or passport numbers; account 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; union membership; genetic data; the contents of a consumer's mail, email, and text messages unless you are the intended recipient of the communication; biometric information for the purpose of uniquely identifying a consumer; and personal information collected and analyzed concerning a consumer's health, sex life, or sexual orientation.	YES, as to the following types of information: social security, driver's license, state identification care, or passport numbers, account log-in, financial account.	Administrators, lenders, banks, auditors, law firms, governmental agencies or pursuant to legal process, self-regulatory organizations, consultants and placement agents.

We do not collect or use sensitive personal information other than:

- To perform services, or provide goods, as would reasonably be expected by an average consumer who requests those goods or services;

- As reasonably necessary and proportionate to detect security incidents that compromise the availability, authenticity, integrity, and confidentiality of stored or transmitted personal information;
- As reasonably necessary and proportionate to resist malicious, deceptive, fraudulent, or illegal actions directed at us and to prosecute those responsible for such actions;
- For short-term, transient use (but not in a manner that discloses such information to another third party or is used to build a profile of you or otherwise alter your experience outside of your current interaction with us);
- To perform services on behalf of our business;
- To verify or maintain the quality or safety of a service or to improve, upgrade, or enhance such service or device; and
- To collect or process sensitive personal information where such collection or processing is not for the purpose of inferring characteristics about a consumer.

Purposes for Collecting Personal Information: We may collect or disclose the personal information we collect about you for one or more of the following business or commercial purposes:

- Performing services to you, including, but not limited to:
 - the administrative processes (and related communication) in preparing for the admission of investors to the fund(s), including administering, managing and setting up an investor's account(s) to allow such potential investor to purchase interests in the fund(s);
 - ongoing communication with potential investors, their representatives, advisors and agents (including the negotiation, preparation and signature of documentation) during the process of admitting potential investors to the fund and the execution of all relevant agreements;
 - the performance of obligations under the governing documents of the funds (and all applicable anti-money laundering, KYC and other related laws and regulations) in assessing suitability of potential investors in the applicable fund;
 - ongoing operations, administrative, accounting, reporting, account maintenance and other processes and communication required to operate the business of the funds in accordance with its governing documents and other documentation between the parties, including customer service, processing or fulfilling transactions, verifying personal information, processing contributions and distributions and financing;
 - keeping investors informed about the business of the general partner or managing member of the applicable fund and its affiliates generally, including offering opportunities to make investments other than to the applicable fund and related advertising;
 - facilitating the execution, continuation or termination of the contractual relationship between an investor and the general partner or managing member, the investment adviser and/or the fund(s);
 - facilitating the transfer of fund interests, and administering and facilitating any other transaction, between an investor, the general partner or managing member, the investment adviser and/or the fund(s);
- auditing and verifications related to investor interactions, including, but not limited to, verifying the quality and effectiveness of services and compliance;
- maintaining the safety, security and integrity of our products and services, databases, technology assets and business, including detecting security incidents and protecting against malicious, deceptive, fraudulent, or illegal activity;
- enabling any actual or proposed assignee or transferee of the fund(s) to evaluate proposed transactions;
- facilitating business asset transactions involving the funds; and
- complying with U.S., state, local and non-U.S. laws, rules and regulations.

We collect personal information from the sources set forth in the Privacy Notice above. We retain the categories of personal information set forth above in the “Categories of Personal Information We Collect” section of this Privacy Notice Supplement only as long as is reasonably necessary for those purposes set forth above, except as may be required under applicable law, court order or government regulations.

Rights under the CCPA

Deletion Rights: You have the right to request that we delete any of your personal information that we retain, subject to certain exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations. We will notify you in writing if we cannot comply with a specific request and provide an explanation of the reasons.

Disclosure and Access Rights: You have the right to request that we disclose to you certain information regarding our collection, use, disclosure and sale of personal information specific to you. Such information includes:

- The categories of personal information we collected about you;
- The categories of sources from which the personal information is collected;
- Our business or commercial purpose for collecting such personal information;
- Categories of third parties with whom we disclose the personal information;
- The specific pieces of personal information we have collected about you; and
- Whether we disclosed your personal information to a third party, and if so, the categories of personal information that each recipient obtained.

Correction Right: You have the right to request that we correct any inaccuracies in the personal information that we retain, subject to certain statutory exceptions, including, but not limited to, our compliance with U.S., state, local and non-U.S. laws, rules and regulations. We will notify you in writing if we cannot comply with a specific request and provide an explanation of the reasons.

No Discrimination: We will not discriminate against you for exercising your rights under the CCPA, including by denying service, suggesting that you will receive, or charging, different rates for services or suggesting that you will receive, or providing, a different level or quality of service to you.

How to Exercise Your Rights: To exercise any of your rights under the CCPA, or to access this notice in an alternative format, please submit a request on your behalf using any of the methods set forth below.

Call us using the following number: (212) 796-8544

Submit a request online using the following online form:
<https://www.sycamorepartners.com/contact>.

Email us at the following email address: info@sycamorepartners.com

We will contact you to confirm receipt of your request under the CCPA and request any additional information necessary to verify your request. We verify requests by matching information provided in connection with your request to information contained in our records. Depending on the sensitivity of the request and the varying levels of risk in responding to such requests (for example, the risk of responding to fraudulent or malicious requests), we may request further information or your investor portal access credentials, if applicable, in order to verify your request. We may also verify your request. You may designate an authorized agent to make a request under the CCPA on your behalf, provided that you provide a signed agreement verifying such authorized agent’s authority to make requests on your behalf,

and we may verify such authorized person's identity using the procedures above. If we request you verify your request and we do not receive your response, we will pause processing your request until such verification is received.

Please contact the Chief Compliance Officer of Sycamore Partners at 212-796-8544 or cvogel@sycamorepartners.com with any questions about this Privacy Notice.

Supplement for EU and UK Investors

We are providing this Supplemental Notice to you to comply with the requirements of Regulation (EU) 2016/679, which is an EU law which regulates the handling of personal information about individuals, and the equivalent legislation in the United Kingdom (together, the “GDPR”). In our use of investor data, the relevant Sycamore fund will be characterized as a “**controller**” for the purposes of the GDPR.

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. Please note that we do not perform any automated individual decision-making involving 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 57th Street, 31st 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, or if you reside in the United Kingdom, the UK Information Commissioner's Office.

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 (“EEA”) and the United Kingdom, which may be in the USA or other countries which may not be considered by the European Commission or the UK Government to offer an equivalent level of protection of personal data as the level afforded in the European Union and the United Kingdom. Personal data transferred to countries outside of the EEA and the United Kingdom 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 Act (As Revised) of the Cayman Islands (“**DPA**”) 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 DPA. The fund’s affiliates and delegates may act as “**data processors**” for the purposes of the DPA.

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 DPA, 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 57th Street, 31st 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 DPA. For the purposes of the DPA, 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 DPA.