
RAINE PRIVACY NOTICE

Last updated: April 2023

Raine (as defined below) considers privacy to be fundamental to our relationship with investors. We are committed to maintaining the confidentiality, integrity and security of investors' personal data. We appreciate that we have access to information about our investors that is generally available to the public and understand Raine's obligation to protect the privacy of that information.

As used in this Notice, "Raine" means (i) Raine Capital LLC ("Raine Capital"), an Investment Adviser registered with the SEC; (ii) Raine Securities LLC ("Raine Securities") Raine Capital's affiliated broker dealer registered with the SEC and a member of FINRA; and (iii) any entity controlled by or under common control with Raine Capital, excluding any Portfolio Companies. "Portfolio Companies" means any portfolio companies in which Funds (as defined below) invested or propose to invest

This Privacy Notice (the "Notice") details how the relevant members/affiliates of Raine ("we" or "us") (including the general partners of limited partnerships/managing members of limited liability companies composing investment funds sponsored or managed by Raine (each a "Fund") in which existing, former and prospective investors in the Funds ("Investors") invest), process personal data received about such Investors or any person acting on behalf of an Investor, as the contact person or ultimate beneficial owner of an institutional investor) (the Investor and any such persons acting on its behalf each referred to herein as "you") in relation to the investment or potential investment in the relevant Fund. We collect, share, and process such personal data and your rights and obligations in relation to your personal data the course of your investment (or, where you act on behalf of an Investor, during the course of that Investor's investment). For information about personal data collected about individuals outside this context, please see [our website privacy policy](#)

This Notice also describes the measures we have taken in order to protect the confidentiality, integrity and security of personal data regarding investors for our purposes for collecting such information, Investors' rights regarding their personal data and the way to contact Raine to exercise those rights. It also describes the limited extent to which we may share that information with affiliates and affiliated third parties of the Funds.

This Notice and the policies described herein are subject to change at any time.

Data Controller Contact Details

Raine Capital is the data controller in relation to personal data relating to Investors (or persons representing such Investors). Relevant information to Raine Capital and applicable affiliates of Funds is available in the Fund's legal documents and subscription agreements. These documents are accessible to existing Investors at the following third party investor portals: (1) the JPMorgan SG Investor Portal (for Raine's growth equity, gaming and venture capital funds); and (2) O'Connor Davis Administration ("ODA") Investor Portal (for Raine's hedge fund) or can be made available by emailing FundLegal@raine.com. These documents are available to new Investors (or persons acting on behalf of such Investors) for the Funds which are open for subscription, via a secure data room available only during the fundraising period, or can be made available by emailing FundLegal@raine.com

Collection of Information

Where you are an Investor who is an individual where you are acting on behalf of an Investor (you are an advisor, employee or contact person of an Investor (or its affiliates) or you are an ultimate beneficial owner of an institutional investor or an advisor, employee or contact person of such ultimate beneficial owner), you and/or the Investor will provide your personal data to us by completing the subscription forms and associated documentation, by communicating with us by phone, or otherwise (including through our advisors) or by the electronic subscription document accessible on the Investor onboarding portal for the Funds, Fund Form. In addition, some of the personal data you provide to us will be accessible to you via the above mentioned JPMorgan and ODA Investor portals

In all cases, we may collect and process the following personal data about you:

- Contact and/or personal data such as first name, last name, telephone number, email address, residential address, business address;
- Government issued identifiers such as passport number, driver's license number, tax ID numbers;
- Other information we collect from investor questionnaires, subscription agreements and/or other forms of communications with you, such as social security numbers, net worth and sources of income;
- Information about transfers of your interests in our funds to third parties and parties to and terms of such transactions with third parties;
- Bank details and wire instructions;
- Screening against OFAC and various other lists, criminal searches and newspaper records;
- KYC and/or AML documentation including proof of identity and proof of address (for example, utility bills, bank statements, driver's license, passport or other photo ID);
- Transactions within the Funds, including capital account balances, investments and redemptions;
- With regard to each of your visits to the above mentioned JPMorgan and [Northern Investor] portals we automatically collect technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- Information in relation to your net worth, history of investments, investment preferences and/or tax position, allocation of interests in any Funds and/or allocation of profit or other distributions from such Funds

Purpose of Processing

We process your personal data in reliance upon the legal basis and for the purposes set out below.

Purpose of Use	Categories of Personal Data processed for each purpose	Legal Basis for Processing
<p>Account administration, handling of orders, management of subscription, redemption and transfer of interests, maintaining the register of partners or members and distributions, managing distributions including the allocations of profit and loss between Investors, internal audits, validations, communications events, investor relations and more generally performance of services requested by and operations in accordance with the instructions of the Investor.</p>	<p>Where you are acting on behalf of an Investor:</p> <p>Contact and/or personal data such as first name, last name, telephone number, email address, residential address, business address; and</p> <p>Government issued identifiers such as passport number, driver's license number, tax ID number.</p>	<p>Where you are acting on behalf of an Investor (including direct or indirect directors, officers, owners, beneficial owners, employees or advisors of an Investor) it is necessary for our legitimate interests (to ensure effective administration of the investment).</p>
	<p>Where you are an Investor who is an individual:</p> <p>Contact and/or personal data such as first name, last name, telephone number, email address, residential address, business address, dietary preferences;</p> <p>Government issued identifiers such as passport number, driver's license number, tax ID number;</p> <p>Information in relation to your net worth, history of investments, investment preferences and/or tax position, allocation of interests in any Funds in which you are an investor and/or allocation of profit or other distributions from such Funds and</p> <p>Wire instructions.</p>	<p>Where the Investor is an individual: it is necessary for entry into and performance of contract.</p>

Purpose of Use	Categories of Personal Data processed for each purpose	Legal Basis for Processing
	<p>address, residential address; business address;</p> <p>Government issued identifiers such as passport number, driver's license number, tax ID number; and</p> <p>KYC and/or AML documentation including proof of identity and proof of address (for example, utility bills, bank statements, driver's license, passport or other photo ID).</p>	
<p>Monitoring electronic communications for quality and business analysis.</p>	<p>Where you are acting on behalf of an Investor or where you are an Investor who is an individual:</p> <p>Contact information such as first name, last name, username, telephone number, email address, date and content of call.</p>	<p>Necessary for our legitimate interests (to run an efficient and successful fund).</p>
<p>For the purpose of receiving marketing materials and information about fundraising activities for new funds and investment entities. You can opt out of receiving such communications at any time by contacting us at IR@raine.com</p>	<p>Where you are acting on behalf of an Investor or where you are an Investor who is an individual:</p> <p>Contact information such as first name, last name, telephone number, email address.</p>	<p>Consent, where required, for legitimate interests.</p>
<p>For the purpose of processing payments</p>	<p>In relation to the Investor or those who may be acting on the Investors behalf:</p> <p>Contact information such as first name, last name, telephone number, email address.</p>	<p>Where the Investor is a</p>

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Protection of Information

We maintain physical, electronic and procedural safeguards that comply with federal standards to protect personal data regarding investors. We use reasonable best efforts to require that any person or institution to which we disclose personal data regarding an investor will protect the confidentiality of that investor information and use the information only for the purposes for which we disclose the information to them. In addition, we restrict access to nonpublic personal data regarding investors to those employees who need to know that information in the course of their job responsibilities.

Data Subject Rights

The General Data Protection Regulation (the "GDPR") and other national privacy laws provide data subjects with certain rights regarding their personal data. To the extent applicable, Investors whose personal data is collected, processed, stored, or transmitted by us are entitled to exercise these rights.