

ADDENDUM TO PRIVACY POLICY

In order to comply with the requirements of the European General Data Protection Regulation (GDPR) for our limited partners resident in the European Union, this Addendum to the Privacy Policy outlines the legal basis on which we process your personal data and provides other information required by the GDPR.

INFORMATION ABOUT YOUR PERSONAL DATA

"Personal Data" is information that can be used to identify you, directly or indirectly, alone or together with other information. This includes things such as name, email address, and phone number. JMI collects, uses, discloses and processes Personal Data as outlined in this Addendum and our Privacy Policy in connection with your investment or interest in investment funds advised or managed by JMI.

LEGAL BASIS FOR PROCESSING

For the purposes of applicable data protection laws, JMI, Management, Inc. is the controller of the Personal Data you provide to us ("Data Controller"). As a Data Controller, we process the Personal Data we maintain about you in accordance with this Addendum and our Privacy Policy and such processing is necessary in connection with your investment or interest in investment funds advised or managed by JMI.

DATA RETENTION

JMI will retain your Personal Data for as long as you maintain an investment or interest in investment funds advised or managed by JMI and as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements. Where we no longer need to process your Personal Data for the purposes set out in this Addendum and our Privacy Policy, we will delete your Personal Data from our systems and where permissible, we will also delete your Personal Data upon your request.

YOUR RIGHTS

If you reside in the European Economic Area, you have certain rights to the Personal Data that we have collected about you. To exercise your rights to your Personal Data, please contact us at compliance@jmi.com and we will respond to reasonable requests as soon as practicable, and in any event, within the time limits prescribed by law.

We encourage you to contact us directly and allow us to work with you to address your concerns. Nevertheless, you have the right to lodge a complaint with a competent data protection supervisory authority if you consider that the processing of Personal Data relating to you infringes applicable data protection laws.

QUESTIONS OR REQUESTS

If you have a question or a complaint about this Addendum please contact us at compliance@jmi.com,