

Privacy Policy

Last Updated: April 17, 2023

Commitment to Privacy

Tactical Infrastructure Partners, LP and its affiliates (collectively, “**TIP**,” “**we**,” “**us**” or “**our**”) are committed to responsibly handling personal information¹ that we collect or otherwise process regarding our investors (including, for the purposes hereof, potential investors or former investors) and individuals who visit our website (the “**Website**”) or otherwise communicate or engage with us (“**you**” or “**your**”).

Our intention with this privacy policy (this “**Privacy Policy**”) is to provide you with clear, transparent and easily understandable information about how TIP uses and otherwise processes your personal information and certain rights you may have relating to such use and other processing. We reserve the right to change this Privacy Policy at any time, as circumstances or requirements change. All updates are effective immediately when we post them here and apply on a go-forward basis. For this reason, we encourage you to review this Privacy Policy whenever you visit the Website so you are aware of any updates, as they will be applicable to you and your personal information.

Collection of Personal Information

The types of personal information collected by or on behalf of TIP about you varies based on TIP’s interactions with you (for example, whether you are an investor or an individual visiting the Website).

Personal information collected by or on behalf of TIP about individuals visiting the Website is obtained directly from you or certain third parties. The personal information we collect about you in the course of your interaction and correspondence with us via the Website includes, but is not limited to, the following:

- IP address and other online identifiers/web beacons;
- details of your online browsing activities on the Website, including, but not limited to, the full Uniform Resource Locators (URL), clickstream to, through and from the site (including, but not limited to, date and time), services you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;

¹ For the purposes of this Privacy Policy, the term “personal information” has the meaning given to such term (or to terms of similar intent, such as “personal data”) under applicable law, as and to the extent applicable to your rights and our obligations with respect to such information, including (as and to the extent applicable): (i) “personal information” as defined under the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020, (ii) “non-public personal information” as defined under the Gramm-Leach-Bliley Act (Public Law 106-102), and/or (iii) “personal data” as defined under the General Data Protection Regulation (EU) 2016/679 or the UK General Data Protection Regulation (i.e., the GDPR as implemented into the laws of the United Kingdom).

- your browser type and version, relevant plug-ins, operating system and platform; and
- your time zone settings.

If you are an investor, additional personal information collected by or on behalf of TIP about you is obtained directly from you, your professional advisors or other third parties, and generally comes from sources such as subscription agreements, investor questionnaires, other required forms, documents and agreements or other correspondence (including, but not limited to, written, telephone, videoconference or electronic contacts) with you regarding your accounts or transactions with non-affiliated third parties. The personal information we collect about you as an investor in the course of your interaction and correspondence with TIP and its representatives includes, but is not limited to, the following:

- basic personal details, including, but not limited to, your name and address (and proof of name and address), email address, telephone number, any other contact details you may supply, social security number, passport number, driver's license number, state identification card, tax details, nationality, citizenship, tax residency, and date of birth;
- details of your company's directors, shareholders, secretaries, authorized signatories and other comparable officers and/or beneficiaries, and identification documents;
- financial information, including, for example, wire transfer information and/or banking details;
- information regarding your assets, income and/or financial dealings, including, for example, net worth, account transactions and investment history;
- personal characteristics, including, for example, your signature;
- details of business advisers you may employ, including, for example, wealth managers and independent financial advisers;
- records of all communications, including, for example, recordings of your attendance (or your representative's attendance) at certain meetings/phone calls, and electronic communications with TIP's staff and meeting notes (see below for more details); and/or
- personal information about transactions with us or others, such as ownership of certain types of accounts or other account data.

If you are an investor, TIP also may collect or receive personal information about you from third parties such as service providers to TIP's sponsored funds, investor advisors (including, but not limited to, independent financial advisors), vendors, and publicly available sources such as company websites. We may collect or receive any of the personal information noted above from such third parties, and in addition, we may collect or receive the following:

- details of any complaints made by you with respect to your dealings with the relevant service provider to the fund;
- data received from due diligence activities (such as due diligence relating to anti-money laundering, politically exposed persons and sanctions checks); and/or

- fraud inquiries (for example, information from police reports).

In addition, if you are an investor, TIP obtains personal information about your interests in funds (such as capital account balances and percentage interests) from the funds themselves and their other non-affiliated service providers.

Of the above categories of personal information that we may collect about you, the following may be considered “sensitive” categories under certain applicable laws: social security number, passport number, driver’s license number, state identification card and financial account information. This Privacy Policy, and the practices described herein, applies equally to our collection, use, disclosure and other processing of such “sensitive” personal information.

Please see the section entitled “Cookies” below for a discussion of our use of cookies on the Website.

The Website is not intended for children and we do not knowingly collect data relating to children (including any minors under the age of 16).

Use of Personal Information Collected

TIP uses your personal information to operate its business, including as follows:

- to provide you with services that you have requested and to fulfill TIP’s contractual obligations, including, but not limited to, any contractual obligations as the general partner(s) and/or the investment advisor to a fund in which you have subscribed (including, for the avoidance of doubt, the preparation of Schedules K-1 and other tax forms or other filings);
- to operate the Website and our other IT systems, and safeguard their security;
- to fulfill our contractual obligations to other third parties to whom you have provided your information;
- for TIP’s internal business administration, record keeping and security purposes;
- for legal and regulatory compliance purposes, including, for example, as necessary to respond to governmental, regulatory or law enforcement agency requests;
- where required or considered appropriate, including, for example, prior to admitting you to a fund, prior to accepting capital contributions or making a capital distribution, carrying out “know-your-client” (KYC) checks as deemed appropriate and other procedures that TIP undertakes in the course of TIP’s ongoing business relationship with you; and/or
- to provide information to future purchasers or merger partners of all or a portion of TIP or any of its funds, or to provide information as may be necessary in connection with other corporate transactions, such as financings or restructurings.

TIP generally does not send marketing messages; however, from time to time, TIP will provide you with information on TIP-sponsored funds that we may be raising. You have the right to ask us not to send you marketing messages by post, telephone or e-mail or any combination of these at

any time; however, you acknowledge that such information may be included in general update letters and while you may choose not to receive such updates, we are under no obligation to provide redacted versions of such letters or otherwise create separate reports on your behalf excluding such marketing information. You can also let us know at any time that you wish to change your mind and to start receiving such messages. You can do this by replying directly to the marketing message or at any time by contacting us.

We do not use or otherwise process your personal information, including “sensitive” personal information, for purposes of automated decision-making, including profiling.

We do not use or otherwise process your “sensitive” personal information other than as described herein.

Disclosure of Personal Information

We do not disclose any personal information about you except as detailed in this Privacy Policy. We disclose your personal information to the following categories of third parties:

- our employees, for purposes of operating our business;
- vendors and service providers needed to operate the Website, and the fund(s) in which you are invested, including, but not limited to: (i) legal counsel, (ii) accountants, (iii) audit firms, (iv) banks, (v) administrators, (vi) tax consultants, (vii) tax preparers, (viii) placement agents, (ix) financial advisors, (x) broker-dealers, (xi) transfer agents, (xii) custodians, (xiii) investor portal service providers, (xiv) persons or entities that are assessing our compliance with industry standards, and (xv) vendors supporting the Website or our other IT systems;
- law enforcement agencies and regulators, government agencies or departments or competent authorities of the U.S. (including, for example, the U.S. Securities and Exchange Commission) or of other countries with whom a fund (or a fund’s portfolio company) transacts who request or require such information in order to issue business or regulatory licenses or permits;
- any person or entity, including, without limitation, any governmental agency, regulatory authority or self-regulatory organization having jurisdiction over us or our affiliates, if (i) we determine in our discretion that such disclosure is necessary or advisable pursuant to or in connection with any United States federal, state or local, or non U.S., law, rule, regulation, executive order or policy, including, without limitation, any anti-money laundering law, the USA PATRIOT Act of 2001 or any subpoena, court order or judicial process, and (ii) such disclosure is not otherwise prohibited by applicable law, rule regulation, executive order or policy; and
- third parties with whom a fund (or a fund’s portfolio company) transacts who require information to comply with local anti-money laundering laws, including, but not limited to, banks and other financing counterparties.

In addition, we may disclose personal information as follows:

- to law enforcement agencies and regulators, government agencies or departments or competent authorities of the U.S. (including, for example, the U.S. Securities and Exchange Commission) or of other countries, where we are under a duty to disclose or share your personal information in order to comply with any legal or regulatory obligation, or if we reasonably consider that such disclosure is necessary or advisable to help prevent or detect fraud or other crimes or to protect our rights, property, or safety, or that of our clients, investors or others. Such disclosure (including, but not limited to, tax status, identity or residency or other personal or payment information, documents or self-certifications) may be made directly to such regulators or competent authorities or made indirectly to our advisers or service providers who may make such filings or disclosures on our behalf;
- if we are under a duty to disclose or share your personal information with tax authorities, such information requested by such tax authorities, who may transfer such information to the government or the tax authorities in another country where you may be subject to tax. Such disclosure may be made directly to such regulators or competent authorities or made indirectly to our advisers or service providers who may make such filings or disclosures on our behalf;
- subject to any contractual confidentiality obligations, we may disclose investor names, investors' participation on any limited partner advisory committee, and investors' respective jurisdictions and/or commitment sizes, in each case, to other limited partners or prospective investors of a TIP-sponsored fund;
- if you use a financial or other adviser (as indicated on your subscription agreement or subsequently communicated to us), the details of your investments and valuations may also be provided to such adviser(s);
- to future or potential purchasers or merger partners (i) for due diligence purposes on a need to know basis, (ii) as necessary for pre-closing integration planning, or (iii) in connection with the consummation of a sale or merger transaction; and/or
- on a need to know basis to current, future or potential lenders or other relevant persons as necessary in connection with other corporate transactions, such as financings or restructurings.

We do not sell or offer to sell any personal information about you to third parties or share your personal information with third parties for purposes of cross-context behavioral advertising.

Data Retention

Personal information processed by us shall be kept for at least as long as is required for the purpose for which it was collected and otherwise in order to meet our statutory, regulatory, or other obligations under applicable law. Further details of our data retention policies and procedures are available in our retention policy, information about which you can request by contacting us. When determining relevant retention periods, we take into account factors, including, but not limited to, the following:

- our contractual and business relationships with you;

- legal obligations under applicable law to retain personal information for a certain period of time;
- the amount, nature and sensitivity of your personal information;
- the potential risk of harm from unauthorized use or disclosure of your personal information;
- statutes of limitation under applicable law;
- (potential) disputes; and
- guidelines issued by relevant supervisory authorities.

Data Security

We acknowledge that the personal information you provide may be confidential, and we maintain policies and procedures designed to maintain the confidentiality of and protect your personal information in accordance with our normal procedures and applicable law. We maintain physical, electronic, and administrative measures designed to safeguard your personal information and prevent unauthorized access thereto.

Unfortunately, the storage and transmission of electronic information is not completely secure. Although we strive to protect your personal information, we cannot guarantee the security of information stored on our or our vendors' servers or transmitted via email or through the Website; you transmit personal information to us at your own risk. In addition, links on the Website may take you to third-party websites over which we have no control. While such links are provided for your convenience, you should be aware that the information handling practices of the linked websites might not be the same as ours. You should review any privacy policies or cookie policies on those linked websites. We are not responsible for any linked websites.

Further, you may have created or may in the future create an account with our third-party fund administrator(s) (including through its service provider(s)). We are not responsible for the websites of our third-party fund administrator(s) or its service provider(s), and you should review any separate privacy policies or cookie policies that they provide to you or that they post on their websites.

Cookies

What are Cookies?

Cookies are files or pieces of information that may be stored on your computer (or other internet-enabled devices, such as a smartphone or tablet) when you visit a website. A cookie will usually contain the name of the website from which the cookie has come from, the "lifetime" of the cookie (i.e., how long it will remain on your device) and a value, which is usually a randomly generated unique number.

How we use Cookies

When you visit the Website, one or more "cookies" are generated and deployed with your consent (if required) using Google Analytics. We use cookies to make the Website easier to use and to

better tailor our web presence and products to your interests and needs. Cookies may also be used to help speed up your future activities and experience on the Website. We also use cookies to compile anonymous, aggregated statistics that allow us to understand how people use our web properties and to help us improve web structure and content. These cookies do not identify you as an individual. All data is collected and aggregated anonymously.

Two types of cookies may be used on the Website – “session cookies” and “persistent cookies.” Session cookies are temporary cookies that remain on your device until you leave the Website. A persistent cookie remains on your device for much longer or until you manually delete it (how long the cookie remains on your device will depend on the duration or “lifetime” of the specific cookie and your browser settings).

Google may adjust its cookies from time to time. Please visit the following website to review its latest details on cookies:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage#analyticsjs>.

Your choices with respect to Cookies

If you do not agree to our use of cookies, you should set your browser settings accordingly or not use the Website. Most internet browsers are initially set up to automatically accept cookies. You can change the settings to block cookies or to alert you when cookies are being sent to your device. There are a number of ways to manage cookies. For one way to opt out of the aggregation and analysis of data collected about you on the Website by Google Analytics, if you so choose, visit <https://tools.google.com/gaoptout> and download and install the Google Analytics Opt-out Browser Add-on. Please refer to your browser instructions or help screen to learn more about how to adjust or modify your browser settings.

If you disable the cookies that we use, this may impact your experience while using the Website. For example, you may not be able to visit certain areas of the Website.

If you use different devices to view and access the Website (e.g., your computer, smartphone, tablet), you will need to ensure that each browser on each device is adjusted to suit your cookie preferences.

Additional Information for Individuals Whose Personal Data is Subject to the GDPR or the UK GDPR

Residents of the European Economic Area (“EEA”) and the United Kingdom (“UK” and such residents of either, “EEA/UK Residents”) have certain rights with respect to their personal data² pursuant to the General Data Protection Regulation (EU) 2016/679 (“GDPR”) or the UK General Data Protection Regulation (i.e., the GDPR as implemented into UK law, the “UK GDPR”), as applicable and as further described in this section. If you are an EEA/UK Resident and do not agree with TIP’s use of your personal data as set forth in this Privacy Policy, you should not submit your personal data to TIP. However, if you do not submit certain personal data to TIP, or if you exercise your rights to prevent TIP from using such personal data, you should be aware that TIP may not be able to do business with you.

For the purposes of applicable data privacy legislation, TIP is a “controller” of EEA/UK Residents’ personal data. We transfer, use, store and/or otherwise process your personal data outside of the EEA or the UK, primarily in the U.S. (and may do so in certain other countries), and the laws of the U.S. and certain other destination countries may not offer the same standard of protection for personal data as countries within the EEA or UK. EEA/UK Residents’ personal data also may be processed by staff operating outside the EEA or UK who work for us or for one of our vendors (for example, those who supply support services to us).

In cases of cross-border transfers to countries outside of the EEA or UK, as applicable, if your personal data will be processed in a country with laws that may not be equivalent to, or as protective as, the laws of your home country, TIP will take appropriate steps, in accordance with applicable laws, to require or maintain an adequate level of protection and security for your personal data. For additional information regarding such steps, please contact us using the details set forth at the end of this Privacy Policy.

1. Our bases for collecting and using personal data

We are entitled to use your personal data in the ways set out in this Privacy Policy on the following bases:

- the use of personal data is necessary for the performance of a contract with you for provision of our products and/or services (including, for example, fund subscription agreements and fund limited partnership agreements) or to take steps at your request prior to entering into such a contract;
- we have legal obligations that we are required to discharge (including, for example, legal obligations set forth in fund limited partnership agreements, investment advisory agreements and/or other operative documents);
- the use of your personal data is necessary for our legitimate interests (including, for example, in marketing to prospective investors for the fund in which you are invested, successor funds thereto or other TIP-sponsored funds);
- you have consented to such use; and/or

² For the purposes of this section, “personal data” has the meaning given to such term in the GDPR or UK GDPR, as applicable.

- to establish, exercise or defend our legal rights for the purposes of legal proceedings.

We do not expect to process “sensitive” or “special” categories of personal data under the GDPR or UK GDPR;³ however, if we were to process such personal data, we would do so only where we have asked for your explicit consent, or otherwise where necessary for the establishment, exercise or defense of legal claims, or as otherwise may be permitted under applicable laws.

Provision of certain of your personal data is a legal and contractual requirement to becoming an investor in any TIP-sponsored fund or other pooled vehicle. If you choose not to provide such personal data, we may not be able to perform some of the tasks we need to in order to provide certain products or services to you. If you choose to provide your consent with respect to certain processing of your personal data, you can withdraw such consent at any time by contacting us.

2. Your rights in connection with personal data

Under certain circumstances, by law you have the right to:

- request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are processing it lawfully;
- request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate personal data we hold about you corrected;
- object to processing of your personal data where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also may have the right to object where we are processing your personal data for direct marketing purposes;
- request erasure of your personal data. This enables you to ask us to delete or remove your personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see above);
- request the restriction of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it; and/or
- request the transfer of your personal data to another party in a machine-readable, commonly used and structured format.

If you want to exercise any of these rights, please contact us using the details set forth at the end of this Privacy Policy. The various rights are not absolute and each is subject to certain exceptions or qualifications. For example, if you wish to withdraw your consent or object to processing, we

³ “Special” or “sensitive” categories of personal data include, among other things, data concerning your health, revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or concerning your sexual orientation.

may need to discuss with you whether our use of your personal data needs to continue for other lawful purposes, such as fulfilment of a legal or contractual requirement.

We will respond to your request within one month of receipt of your request. In some cases, we may not be able to fulfil your request to exercise the right before this date, and may need to request more time. Where we cannot provide a full response to you for any reason, we will let you know about this in our initial reply to your request.

3. Your duty to inform us of changes

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your working relationship with us.

4. Fees

You will not have to pay a fee to access your personal data (or to exercise any of the other above-listed rights). In some cases, we may charge a reasonable fee if your request for access is clearly unfounded or excessive, or if you request multiple copies of the relevant information. Alternatively, we may refuse to comply with the request in such circumstances.

5. What we may need from you

To access your personal data (or to exercise any of the other above-listed rights), we may need to request specific information from you to help us confirm your identity and ensure your right to access the personal data (or to exercise any of your other above-listed rights). This is another appropriate security measure designed to ensure that personal data is not disclosed to any person who is not entitled to receive it.

6. Right to complain

If you wish to request further information about any of the above-listed rights, or if you are unhappy with how we have handled your personal data, please contact us using the details set forth at the end of this Privacy Policy. If you are not satisfied with our response to your complaint or believe our processing of your information does not comply with the GDPR, UK GDPR or other applicable data privacy legislation, you can make a complaint to the supervisory authority in your country. For example, in the UK you should contact the Information Commissioner's Office: <https://ico.org.uk/global/contact-us/> or 0303 123 1113.

Additional Information for Individuals Whose Personal Information is Subject to the CCPA/CPRA

Residents of the state of California have certain rights with respect to their personal information⁴ pursuant to the California Consumer Privacy Act of 2018, as amended by the California Privacy Rights Act of 2020 (collectively, the “CCPA”) and as further described in this section. Please note that the rights under the CCPA do not apply to personal information collected, processed, sold or disclosed subject to the Gramm-Leach-Bliley Act (Public Law 106-102), the Fair Credit Reporting Act (12 CFR 1022) and/or the California Financial Information Privacy Act.

Under certain circumstances, under the CCPA you may have the right to:

- request that we disclose, free of charge, the categories and specific pieces of personal information we collect about you (and, if applicable, sell or otherwise disclose to a third party and the categories of such third parties), the sources from which such personal information was collected, and the business purpose for collecting, selling or disclosing such personal information;
- opt out of the sale of your personal information. As noted above, we do not currently sell your personal information or share your personal information with third parties for purposes of cross-context behavioral advertising;
- request that we delete the personal information we have collected about you; and
- request that we correct any inaccurate personal information we have collected about you.

We will not discriminate against any California resident who exercises the rights set forth in this section.

You have the right to appoint an authorized agent to exercise these rights on your behalf. If you want to exercise any of these rights, or have your authorized agent exercise any of these rights on your behalf, then please contact us using the details set forth at the end of this Privacy Policy. To exercise any of these rights, we may need to request specific information from you or your authorized agent to help us confirm your identity and ensure your right to exercise these rights.

These rights are not absolute and each is subject to certain exceptions or qualifications. For example, if you are currently an investor in one of our funds and you request that we delete the personal information we have collected about you, the CCPA permits us to deny such request and retain your personal information to the extent necessary to manage the applicable fund and our business relationship with you in connection with that fund.

For consumers with disabilities who need to access this Privacy Policy in an alternative format, please contact us using the details set forth at the end of this Privacy Policy.

⁴ For the purposes of this section, “personal information” has the meaning given to such term in the CCPA.

Contact Us

Should you have any questions or concerns relating to this Privacy Policy or the processing of personal information we hold about you, please contact us:

By post: 590 Madison Ave, Floor 21, New York, NY 10022

By phone: 817-689-8755

By email: info@tacticalinfra.com