



**GLOBAL INFRASTRUCTURE PARTNERS**

**External Privacy Policy**

*Last Updated: November 2022*

**1. Introduction**

Global Infrastructure Management, LLC (together its affiliates, “GIP”, “we”, or “us”) has adopted this privacy policy (“**Privacy Policy**”) to inform individuals about the personal data GIP collects about them, including through its website (<https://www.global-infra.com/>) (the “**Website**”), from individual investors or individuals associated with investors, personnel working on behalf of GIP’s commercial counterparties, including vendors, and visitors to GIP offices and events.

For purposes of this Policy, “personal data” means information that identifies or relates to, describes, references, is capable of being associated with, or could be reasonably linked, directly or indirectly, with an individual or household. Where applicable, it includes personal data or equivalent as defined in the applicable data protection and privacy laws, including the General Data Protection Regulation (“**GDPR**”) and the California Consumer Privacy Act (“**CCPA**”). GIP is the data controller in relation to personal data it collects through the Website and otherwise described in this Privacy Policy.

**2. How We Collect and Use personal data**

Depending on the context, we collect personal data from various sources, online or offline, including:

- directly from you, such as through subscription agreements and other forms or correspondence (written, telephonic or electronic);
- from third-party sources, including service providers, such as our placement agent, institutional investors with whom individuals may be associated, and our web host or website analytics provider; and
- audio or video recordings (e.g., of webcasts).

In the last 12 months, we have collected the following categories of personal information for the following purposes:

<b>Category of personal data</b>	<b>Business Purpose for Processing</b>  (see also Additional Uses of personal data below)	<b>Legal Basis for Processing</b>
<b>Identifiers:</b> including name, address, and other contact information; date of birth; picture; email address; usernames; copies of, or details from, passport, Social	<ul style="list-style-type: none"><li>• Conduct our investment program and perform contractual obligations with our investors,</li></ul>	<ul style="list-style-type: none"><li>• Legitimate interest (see below)</li><li>• Performance of contract</li><li>• Legal compliance</li></ul>

<p>Security Number, tax identification/status details, or other identification numbers or official documentation.</p>	<p>including by registering your initial investment.</p> <ul style="list-style-type: none"> <li>• For identity or address verification purposes;</li> <li>• To perform background screening of investors and investment partners;</li> <li>• To prevent fraud and conducting “Know Your Client”, anti-money laundering, terrorist financing, and conflict checks, and client due diligence checks;</li> <li>• To communicate with, pay funds to, provide funds performance updates to, keep records for, contract with, and provide services to investors, vendors, or other contacts;</li> <li>• To perform marketing and research services for Investors;</li> <li>• For our recruiting efforts, including to identify potential job applicants and to evaluate candidates as part of job applications;</li> <li>• To ensure a healthy and safe office environment for our investors, vendors, employees, and visitors;</li> <li>• To detect security incidents, protect against malicious, deceptive, fraudulent, or illegal</li> </ul>	<ul style="list-style-type: none"> <li>• Consent (where applicable)</li> </ul>
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	<p>activity, and assist in the prosecution of those responsible for that activity; and</p> <ul style="list-style-type: none"> <li>• To meet relevant regulatory requirements.</li> </ul>	
<p><b>Commercial Information:</b> such as bank account details, wire instructions, brokerage account information, account data and information about your participation in other investments that you provide to us in the course of transacting with us.</p>	<ul style="list-style-type: none"> <li>• To perform fund/subscription processes, accounts, records, marketing, and onboarding services for investors;</li> <li>• To perform background screening of investors and investment partners;</li> <li>• To prevent fraud and conducting “Know Your Client”, anti-money laundering, terrorist financing, and conflict checks, and client due diligence checks;</li> <li>• To communicate with, pay funds to, provide funds performance updates to, keep records for, contract with, and provide services to investors, vendors, or other contacts; and</li> <li>• To meet relevant legal and regulatory requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interest (see below)</li> <li>• Performance of contract</li> <li>• Legal compliance</li> </ul>
<p><b>Employment-Related Information:</b> such as job titles, place of employment, employer details; or other source(s) of wealth.</p>	<ul style="list-style-type: none"> <li>• To perform background screening of investors and investment partners;</li> <li>• To prevent fraud and conducting “Know Your Client”, anti-money laundering, terrorist</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interest (see below)</li> <li>• Performance of contract</li> <li>• Legal compliance</li> <li>• Consent (where applicable)</li> </ul>

	<p>financing, and conflict checks, and client due diligence checks; and</p> <ul style="list-style-type: none"> <li>• For our recruiting efforts, including to identify potential job applicants and to evaluate candidates as part of job applications.</li> </ul>	
<p><b>Health Information:</b> medical and health information such as vaccination status in response to public health guidance or mandates from government authorities, such as when you visit our office or attend in-person events.</p>	<ul style="list-style-type: none"> <li>• To ensure a healthy and safe office environment for our investors, vendors, employees, and visitors;</li> <li>• To meet relevant legal and regulatory requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interest (see below)</li> <li>• Legal compliance</li> <li>• Consent (where applicable)</li> </ul>
<p><b>Communications:</b> individuals' communications with GIP personnel, for example, when you contact us via email.</p>	<ul style="list-style-type: none"> <li>• To perform fund/subscription processes, accounts, records, marketing, and onboarding services for investors;</li> <li>• To communicate with, pay funds to, keep records for, contract with, and provide services to investors, vendors, or other contacts;</li> <li>• To accept/process funds from, pay funds to, keep records for, contract with, and provide services to investors, vendors, or other contacts.</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interest (see below)</li> <li>• Performance of contract</li> <li>• Consent (where applicable)</li> </ul>

<p><b>Inferences, preferences or characteristics that we obtain:</b> including through meetings, telephone conversations, and other interactions we may have with you.</p>	<ul style="list-style-type: none"> <li>• To perform fund/subscription processes, accounts, records, marketing, and onboarding services for investors;</li> <li>• To communicate with, pay funds to, keep records for, contract with, and provide services to investors, vendors, or other contacts;</li> <li>• To accept/process funds from, pay funds to, keep records for, contract with, and provide services to investors, vendors, or other contacts; and</li> <li>• To inform eligibility decisions.</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate interest (see below)</li> <li>• Performance of contract</li> <li>• Consent (where applicable)</li> </ul>
<p><b>Internet or other electronic network activity:</b> such as IP addresses when logging into the data site.</p>	<ul style="list-style-type: none"> <li>• To maintain the security of GIP services, for fraud detection, to detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, and assist in the prosecution of those responsible for that activity, and to protect GIP's rights; and</li> <li>• To manage GIP services and to collect and track information about user activities online over time and across different channels.</li> </ul>	<ul style="list-style-type: none"> <li>• Legitimate Interests</li> </ul>

<b>Location Information:</b> including the location of your IP address.	<ul style="list-style-type: none"> <li>To understand the audiences that visit our website.</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interest (see below)</li> </ul>
<b>Access Control Information:</b> including user names, email address, IP address, and location pings	<ul style="list-style-type: none"> <li>To authenticate users;</li> <li>To secure digital access control for investors, vendors, or other contacts; and</li> <li>To perform recordkeeping and tracking in enterprise and storage software.</li> </ul>	<ul style="list-style-type: none"> <li>Legitimate interest (see below)</li> </ul>
<b>Cookies &amp; Tracking Technologies</b>	<ul style="list-style-type: none"> <li><i>See below in Section "Cookies &amp; Tracking Technologies"</i></li> </ul>	<ul style="list-style-type: none"> <li><i>See below in Section "Cookies &amp; Tracking Technologies"</i></li> </ul>

Where we rely on the following legitimate interests to process your personal data:

- Exercising and complying with our rights and obligations at law or under regulation, including where such obligations are not set out under the laws of European Economic Area ("EEA") member states, the United Kingdom, and the Cayman Islands, or under contract, including for the establishment, exercise, or defense of legal claims;
- Managing and administering our business; maintaining and improving relationships with investors, vendors, or other contacts; and for marketing and business development activities and analysis;
- Managing our information technology systems and to help ensure their ongoing security and integrity;
- Making certain assessments in order to assess our investors' investment objectives, risk tolerance, and understanding of investment risk to assess the suitability of an investment in a Fund or other product offered by us or our affiliates; as necessary to discharge our legal and/or regulatory obligations, perform any contract with you, or further our legitimate interests in engaging in investment activities;
- Communicating with you regarding your relationship with us and/or our affiliates;
- Conducting risk assessment and control, for statistical and trend analysis, for system administration, operation, testing and support and to operate control systems and management information systems;

- Managing risk and to further our legitimate interest in, or in some cases legal obligation to, protect against, identify, and prevent fraud and other unlawful activity;
- Managing litigation; complying with requests from regulatory, law enforcement, or other governmental agencies;
- Investigating and responding to any complaints about our activities and business, maintaining quality, and dealing with complaints and disputes, including as necessary to discharge applicable legal and regulatory requirements;
- Maintaining the ongoing safety, security, and integrity of our business, services, and information technology systems and assets, monitoring and managing access to our systems and facilities, and customizing and securing any accounts held with us;
- Disclosing information to a governmental, tax or regulatory body, financial market, broker or other intermediaries, counterparties, court, auditors, or other third parties, and to conduct compliance activities, when it is necessary to further our legitimate interests, or those of a third party, in doing so, but where EEA (Member State) or UK law does not require us to make this disclosure or conduct those activities; and
- Establishing, exercising, or defending legal claims to protect and enforce or ensure our rights, property, or safety; or to assist LPs and associated individuals, or others, to do this where permissible under applicable law.

We use personal data only for the purposes for which we collected it as set out in this Privacy Policy or otherwise communicate to you and any purpose that is compatible with the same. If we need to use your personal data for an unrelated purpose, we will contact you, in accordance with our obligations under applicable data protection and privacy laws.

***Sensitive personal data***

We use sensitive personal data, including social security numbers, bank account numbers, race, gender and health information only as necessary to perform the services or provide the goods reasonably expected by an average consumer who requests those goods or services and do not use sensitive personal data to infer characteristics about individuals.

**3. How We Disclose the personal data We Collect**

We disclose the personal data to third parties for business, commercial, and legal purposes, depending on the context. In the past 12 months we have disclosed the categories of information noted above with the following parties:

- Affiliated companies, including, where applicable, a fund administrator;
- Portfolio companies;
- Service providers that provide services necessary to effect a transaction that you request, to service your account, or to otherwise provide services to us, such as accountants, attorneys, other advisors, portfolio managers, custodians, banks, insurers, or other administrators in the ordinary course of business.

Law enforcement agencies, regulatory or tax authorities and other governmental or public agencies or authorities to comply with our legal and regulatory obligations and as necessary to further or legitimate interest in protecting our business interests and legal rights.

GIP also may disclose information:

- to comply with our legal and regulatory obligations and as necessary to further our legitimate interest in protecting our business interests and legal rights;
- to cooperate in any government, law enforcement or similar investigation, or to conduct any internal investigation or similar function, either where required by applicable law or regulation or where it is in our legitimate interest to do so in order to protect our business, those we work with and/or other third parties;
- when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss;
- when we believe in good faith that such disclosure is necessary or appropriate in preventing any activity that violates the law (including relating to intellectual property, fraud, contracts, and privacy) or may expose us to liability, and it is in our legitimate interest in order to make such disclosure to minimize potential harm to our business or third parties; and
- in the event of a merger, acquisition, bankruptcy, or other transaction in which the third party assumes control of all or part of our business and where it is in our legitimate interest to share information to further that process for our benefit or that of our employees or other third parties.

GIP has not sold or shared for cross-contextual behavioral advertising purposes personal data in the past 12 months.

#### **4. Cookies & Tracking Technologies**

A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

We use cookies or other tracking technologies (collectively hereinafter, “Cookies”). Insofar as those Cookies are not strictly necessary for the provision of our Website and services, we will ask individuals to consent to our use of Cookies.

##### ***First-party Cookies***

First-party Cookies are set by us. These Cookies are used to collect information about how visitors use our Website. We use the information to compile reports and to help us improve the website. The Cookies collect information in a way that does not directly identify anyone, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited

#### **5. How We Respond to “Do Not Track” Signals**



We do not recognize or respond to automated browser signals regarding tracking mechanisms, which may include “do not track” instructions.

## **6. How Long Do We Retain Your personal data?**

We endeavor to ensure that personal information is kept as current as possible and that irrelevant or excessive data are deleted or made anonymous as soon as reasonably practicable. Our general approach is to only retain personal information for as long as is required to satisfy the purpose for which it was collected by us or provided by you. This will usually be the period of your investment plus the length of any applicable limitation period following the end of your investment, although some data may need to be kept for longer, such as contact information for the purposes of marketing further investment opportunities. Some personal information may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons.

## **7. International Data Transfers**

Our operations involve affiliated entities and non-affiliated service providers based in various global locations, including jurisdictions outside of the EEA, United Kingdom and Cayman Islands, including to the United States. Your personal data may, therefore, be transferred to, or processed in, those jurisdictions to enable us to operate and fulfil your investment, and meet our legal and regulatory obligations. Sometimes, the data protection laws and professional secrecy requirements in those jurisdictions are less protective than those in Luxembourg and the EEA more generally or the United Kingdom and Cayman Islands.

We make such transfers in accordance with applicable data protection requirements. Where necessary, we will do this by entering into appropriate data transfer agreements with third-party recipients of Personal Information incorporating standard contractual clauses approved by the European Commission governing the transfer of Personal Information from a country in the EEA to a country outside the EEA not offering an adequate level for the protection of personal data, including the United States.

## **8. Links to Third-Party Websites**

In some areas of the Website, links to other websites and digital services operated by third parties may be provided as a convenience. These external websites and services have their own policies regarding privacy and security, and we encourage you to review these policies. This Privacy Policy does not apply to, and we are not responsible for the content of, privacy policies or data practices of third parties that collect your information.

## **9. Updates to the Privacy Policy**

If we make any such changes in the way we use your personal data, we will notify you by prominently posting notice of the changes on the Website and updating the last updated date above, or, where required by law, obtain explicit consent to use your personal data for this new purpose.

Any update to this Privacy Policy will be effective upon posting of a modified Privacy Policy on our Website and revising the “Last Updated” date. We encourage you to periodically consult this Privacy Policy to learn about any modifications and updates.

If you have any questions or comments about this Privacy Policy, you can contact us as described in the “How to Contact Us” section below.

## **10. Children’s Privacy**

We are committed to protecting the privacy of children. The Website and our services are directed toward and designed for use by persons aged 16 or older. We do not intend to collect or have actual knowledge that we collect personal data from individuals under the age of 16. If you are under the age of 16, please do not provide us with any personal data. If you have reason to believe that a person under the age of 16 has provided personal data to us without parental consent, please contact us using any of the methods described in the “How to Contact Us” section of this Privacy Policy, and we will endeavor to delete that data from our systems.

GIP does not knowingly sell or share for cross-contextual behavioral advertising purposes personal information of individuals under the age of 16.

## **11. Your Rights**

Depending on the jurisdiction and applicable laws and other circumstances, you may have certain rights with respect to your personal data.

For individuals in the **EEA/UK** and for investors in funds established in the EEA/UK or whose managing general partner is established in the EEA/UK, these may include:

- The right to be informed as to how we collect and use your personal data;
- The right to access and receive a copy of the personal data we hold about you, free of charge, with a prescribed time limit for us to respond;
- The right to rectify or correct any personal data held about you that is inaccurate or incomplete;
- In some circumstances, the right to request the deletion of personal data held about you without undue delay or within a prescribed time limit 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;
- The right to request that your personal data is used only for restricted purposes, including the right to object to direct marketing;
- The right to object to your personal data being processed, if the lawful basis for processing your personal information is either our or a third party’s legitimate interests,;
- The right to be informed of a personal data breach (unless the breach is unlikely to be prejudicial to you);
- The right to require certain of your personal data to be transferred to you or a third party; and
- The right to lodge a complaint with the relevant data protection authority in your jurisdiction (for example, the Commission Nationale pour la protection des Données in Luxembourg, the Information Commissioner’s Office in the United Kingdom, and the Cayman Islands Ombudsman).

For individuals residing in **California**, these rights include:

- The right to request that we disclose to you the personal data we collect, use, and disclose, specifically:
  - the categories of the personal data collected about you;
  - the categories of sources from which your personal data is collected;
  - the business or commercial purposes for collecting your personal data;
  - the categories of third parties to whom we disclose your personal data; and
  - the specific pieces of your personal data we have collected about you.
- The right to request that we delete certain personal data we have collected from you. Please note that we may not be able to delete your data if we need it to comply with legal obligations or otherwise have reason to retain your information for a lawful purpose.
- The right to not receive discriminatory treatment by us if you choose to exercise any of your privacy rights under the CCPA.

#### ***How to Exercise Your Rights and Submit a Request***

To exercise any of the rights above, or if you consider that we have processed your personal data in violation of applicable law, or have any concerns about your privacy, please contact Global Infrastructure Management, LLC, 1345 Avenue of the Americas, 30th Floor, New York, New York 10105, Attention: General Counsel (email: Julie.Ashworth@global-infra.com).

#### ***Verifying Requests***

We may take steps to verify your identity before granting you access to your personal data or complying with your request. If you request access to or deletion of your personal data, we may require you to provide any of the following information: full name, address, email address, and/or phone number.

#### ***Request by an Authorized Agent***

If you designate an authorized agent to make an access, deletion, or request on your behalf, under the GDPR, CCPA, or otherwise, (a) we may require you to provide the authorized agent written permission to do so, and (b) for access and deletion requests, we may require you to verify your own identity directly with us (as described above).

## **12. How to Contact Us**

If you have any questions regarding this Privacy Policy or other privacy-related practices, or wish to notify us of any errors or changes as to any personal data you provide us through the Website, you can contact us in the following ways:

Email: GIPLegal@global-infra.com

Phone: +1 212 315-8100

This Privacy Policy is available in alternative formats upon request.