

Privacy Policy

Last Updated: January 2023

Introduction

TriplePoint Capital, LLC, and its affiliates, (“**TriplePoint**”, “**we**”, “**us**” or “**our**”) understand the importance of keeping your personal information private. This Privacy Policy (“**Policy**”) describes our practices concerning the information we receive or collect when you visit our websites (“**Websites**”), located www.triplepointcapital.com and www.tpv.com, or use our services (“**Services**”).

This Policy describes the information we collect, how and for which purposes we may use such information, where we store it and for how long we retain the information, with whom we may share it, our use of tracking technologies and communications, our security practices, your choices and rights regarding such information, our policy concerning children, and how to contact us if you have any concerns regarding this Policy or your privacy.

A PDF version of this Policy for printing is available [here](#).

Information Collection

We may collect one or more of the following categories of personal information about the visitors to our Websites, actual users of our Services or potential users (“**Users**”) of our Services through the following sources: (i) from your interactions with us when you visit our Websites; (ii) from you directly when you contact us or when you request additional information about our Services; (iii) from registrations and other forms when you register for our Services or complete a transaction; or (iv) from your communications, calls to our customer service team or through your other interactions with us.

Category of Personal Information Collected	Types of Personal Information Collected	Sources of Personal Information	Business Purpose for Collection of Personal Information
Identifiers	Business Contact Information, including Name (first and last); Email Address; Phone Number; Postal Address.	Directly from our Users.	To open, administer, and manage your accounts; to provide you with customer service support; to contact you with information regarding your accounts; to prevent or detect unlawful acts; to protect or enforce our legal rights; to ensure the security of your accounts; and to comply

			with the applicable laws of the jurisdictions where we conduct business.
Geolocation Data	Device Location	Cookies and Other Online Tracking Technologies.	To prevent or detect unlawful acts; to protect or enforce our legal rights; to ensure the security of your accounts; and to comply with the applicable laws of the jurisdictions where we conduct business.
Audio, Electronic, Visual, Thermal, Olfactory, or Similar Information	Recordings of User Phone Calls	Directly from our Users.	To open, administer, and manage your accounts; to provide you with customer service support; to contact you with information regarding your accounts; to prevent or detect unlawful acts; to protect or enforce our legal rights; to ensure the security of your accounts; and to comply with the applicable laws of the jurisdictions where we conduct business.
Commercial Information	Details related to transactions, including Services used, or considered; Transaction history or tendencies.	Directly from our Users.	To open, administer, and manage your accounts; to provide you with customer service support; to contact you with information regarding your accounts; to prevent or detect unlawful acts; to protect or enforce our legal rights; to ensure the security of your accounts; and to comply with the applicable laws

			of the jurisdictions where we conduct business.
Professional or Employment-Related Information	Business Contact Information.	Directly from our Users.	To open, administer, and manage your accounts; to provide you with customer service support; to contact you with information regarding your accounts; to prevent or detect unlawful acts; to protect or enforce our legal rights; to ensure the security of your accounts; and to comply with the applicable laws of the jurisdictions where we conduct business.
Internet, Computer or Other Similar Network Activity	Browser; Operating System; IP Address; Device Location.	Cookies and Other Online Tracking Technologies.	To open, administer, and manage your accounts; to provide you with customer service support; to contact you with information regarding your accounts; to prevent or detect unlawful acts; to protect or enforce our legal rights; to ensure the security of your accounts; and to comply with the applicable laws of the jurisdictions where we conduct business.

Cookies & Other Tracking Technologies: When you visit our Websites, our servers may automatically collect some personal information about you and the device you are using to access our Websites, including the type of browser and operating systems you are running, your IP address assigned to your computer or Internet connection, and the IP address of any website that referred you to our Websites. We use this information to understand how visitors to our Websites navigate our Websites, to enhance your experience while using our Websites, and to update our Websites as needed.

Legitimate Interests / Consent: To the extent we rely on our legitimate interests as a legal basis for processing of personal information, we have considered the balance between our own interests (among other things, the lawful and efficient operation and provision of our Services) and the interests of our clients, potential clients, and visitors to our Site and believe that (a) the kind of processing referenced above would be reasonably expected by you and (b) such processing will not cause any harm to you and/or will not seriously impact your rights and freedoms with respect to the privacy of your personal information. Where we rely on your consent as a legal basis for processing personal information, you have the right to withdraw such consent at any time.

Purposes of Information Use

We use your personal information as necessary for the performance of our Services; for complying with applicable law; and based on our legitimate interests in maintaining and improving our Services and offerings, understanding how our Services are used, optimizing our marketing, customer service and support operations, and protecting and securing our users, ourselves, and members of the general public.

Specifically, we use Personal Information for the following purposes:

- To facilitate, operate, and provide our Services;
- To authenticate the identity of our Users, and to allow them to access and use our Services;
- To provide our Users with assistance and support;
- To further develop, customize and improve the Services and your User experience;
- To support and enhance our data security measures, including for the purposes of preventing and mitigating the risks of fraud, error, or any illegal or prohibited activity; and
- To comply with any applicable laws and regulations.

How We Share Your Information in Connection with the Services

We do not sell your personal information. However, we may share your personal information in order to provide our Services, with the following categories of recipients:

1. **TriplePoint Service Providers.** We may engage selected third-party companies and individuals to perform services complementary to our own or to support our business functions (collectively, “**Service Providers**”). These Service Providers may have access to your personal information, depending on each of their specific roles and purposes in facilitating and enhancing our Services, and may only use it for such purposes.
2. **Subsidiaries and Affiliated Companies.** We may share personal information internally within our family of companies, for the purposes described in this Policy.
3. **Business Transfers.** Should TriplePoint or any of its affiliates undergo any change in control, including by means of merger, acquisition, or purchase of substantially all of its assets, your personal information may be shared with the parties involved in such event.

If we believe that such change in control might materially affect your personal information then stored with us, we will notify you of this event and the choices you may have via e-mail or prominent notice on our Services.

4. **Legal and Regulatory Authorities.** We may provide legal and regulatory authorities access to your personal information, including to respond to a subpoena or court order, judicial process, or regulatory inquiry; to defend against fraud, lawsuits, claims or other liabilities; to prevent physical harm or financial loss in connection with any suspected or actual illegal activity; or where we have a good faith belief that we are legally compelled to do so.

We may also share your personal information with others if we believe in good faith that this will help protect the rights, property, or personal safety of TriplePoint, any of our users, or any members of the general public or in instances where you have provided to us your consent.

Cross-Border Data Transfers, Retention, and Protection of Information

a. **Cross-Border Transfers:** We may transfer your personal information to a jurisdiction other than the one from which we have collected your personal information, including to countries that may not have the same level of protections as the country where you are located. If we do transfer your personal information to another jurisdiction, we will do so following due diligence and provided that the data recipient is subject to contractual agreements imposing obligations on it to ensure appropriate technical and organizational measures are implemented and maintained at all times to prevent the unauthorized and unlawful processing of personal information, and the accidental loss or destruction of, or damage to, personal information, consistent with our obligations under applicable data protection laws. By using our Services, you agree to the transfer of your personal information to other jurisdictions.

b. **Retention of Personal Information:** We will retain your personal information for as long as you use the Services or as necessary to fulfill the purpose(s) for which it was collected, provide our products and services, resolve disputes, establish legal defenses, conduct audits, pursue legitimate business purposes, enforce our agreements, and comply with applicable law. If we are required to maintain a record of any information, you may not be able to delete such information due to such requirements.

c. **Security of Personal Information:** We maintain administrative, technical, and physical safeguards that are designed to protect the privacy and security of your personal information. For example, all information you provide is accessible only to designated staff. We note, however, that the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of information transmitted to our Website or via the Services. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website. In addition, where you have chosen a password for access to certain parts of our Website, you are responsible for keeping this password confidential.

Third Party Links

We may provide links to other sites or resources provided by third parties. These links are provided for your convenience only. We have no control over the content of those sites or resources and accept not responsibility for them or for any loss or damages that may arise from

your use of them. If you decide to access any third-party links on the Website, you do so entirely at your own risk and subject to the terms and conditions of those websites.

Do-Not-Track Settings

Do Not Track (“DNT”) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third parties. We do not respond to DNT signals.

Children

Our Services are not directed to children under 13 years of age, and we do not knowingly collect information from children under 13. If we become aware that a child under 13 has provided us with personal information, we will prohibit and block such use and will make all efforts to promptly delete any personal information stored with us with regard to such child.

Your Privacy Rights

Depending upon where you reside, certain choices and rights may be available to you under applicable data protection laws, including the right to request access to or correction of your personal information or to have your personal information deleted. If you have any questions about what rights may apply to you, please contact us at privacy@triplepointcapital.com.

“Shine the Light” and “Eraser” Laws: Residents of the State of California may request a list of all third parties to which we have disclosed certain information during the preceding year for those third parties’ direct marketing purposes.

California Consumer Privacy Act (CCPA)/California Privacy Rights Act (CPRA): The CCPA, as amended by the CPRA, provides California residents and/or their authorized agents with specific rights regarding the collection and storage of their personal information.

Your Right to Know: California residents have the right to request that we disclose the following information to you about our collection and use of your personal information over the past twelve (12) months. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Upon verification, we will disclose to you:

1. The categories of personal information we have collected about you.
2. The categories of sources for the personal information we have collected about you.
3. The specific pieces of personal information we have collected about you.
4. Our business or commercial purpose for collecting or selling your personal information.
5. The categories of third parties to whom we have sold or shared your personal information, if any, and the categories of personal information that we have shared with each third-party recipient.

Your Right to Opt-Out of Sale or Sharing of Personal Information: California residents have the right to opt-out of the sale of their personal information by contacting us using the information in the “Contact Us” section below.

Please note that we do not knowingly sell the personal information of any individuals under the age of 16.

Where we are sharing your personal information with third parties for the purposes of cross-context behavioral advertising or profiling, you may opt-out of such sharing at any time by submitting a request as directed on the homepage of our website or by contacting us using the information in the “Contact Us” section below.

Your Right to Limit Use of Sensitive Personal Information: California residents have the right to request that we limit our use of any sensitive personal information to those uses, which are necessary to perform the Services or for other specifically enumerated business purposes under the CCPA, as amended by the CPRA.

Your Right to Delete: California residents have the right to request that we delete any of the personal information collected from you and retained by us, subject to certain exceptions. We may ask you to provide certain information to identify yourself so that we may compare it with our records in order to verify your request. Once your request is verified and we have determined that we are required to delete the requested personal information in accordance with the CCPA, we will delete, and direct our third-party service providers to delete, your personal information from their records. Your request to delete personal information that we have collected may be denied if we conclude it is necessary for us to retain such personal information under one or more of the exceptions listed in the CCPA.

Your Right to Correct: Under the CCPA, as amended by the CPRA, California residents have the right to request that we correct any inaccurate personal information we maintain about you, taking into account the nature of the personal information and the purposes for which we are processing such personal information. We will use commercially reasonable efforts to correct such inaccurate personal information about you.

Non-Discrimination: You will not receive any discriminatory treatment by us for the exercise of your privacy rights conferred by the CCPA.

Verifying Your Request: Only you, or a person that you authorize to act on your behalf, may make a request related to your personal information. In the case of access and deletion, your request must be verifiable before we can fulfill such request. Verifying your request will require you to provide sufficient information for us to reasonably verify that you are the person about whom we collected personal information or a person authorized to act on your behalf. We will only use the personal information that you have provided in a verifiable request in order to verify your request. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority. Please note that we may charge a reasonable fee or refuse to act on a request if such request is excessive, repetitive or manifestly unfounded.

For Individuals located in the European Union, United Kingdom or Switzerland: You have a number of rights under applicable data protection laws in relation to the collection and use of your personal information. Under certain circumstances, you have the right to:

- Access your personal information;
- Request we delete your personal information;
- Request we correct your personal information;

- Restrict the processing of your personal information;
- Object to further processing of your personal information, including to object to marketing from us;
- Make a data portability request;
- Withdraw any consent you have provided to us for the processing of your personal information;
- Restrict any automatic processing of your personal information;
- Submit a complaint to the appropriate Supervisory Authority.

Contact Us

If you have questions or concerns regarding this Policy, please contact us at 1-800-305-6302 or by email at privacy@triplepointcapital.com

If you are located in the European Union, United Kingdom, or Switzerland and believe we have not adequately resolved any issues, you may contact the Supervisory Authority concerned.

Changes to this Policy

This Policy is effective as of the date stated at the top of this page. Please read this Policy carefully. TriplePoint will occasionally update this Policy. By accessing and using the Website after we notify you of such changes to this Policy, you are deemed to have accepted such changes. Please refer back to this Policy on a regular basis.