

## **StepStone Group Investor Privacy Notice (California)**

In this Investor Privacy Notice (California), we, StepStone Group LP, StepStone Group Real Estate LP, StepStone Group Real Assets LP, StepStone Group Private Wealth LLC, StepStone Group Private Debt LLC, and their subsidiaries and affiliates, as applicable, (collectively “**StepStone**”), address disclosure requirements towards you, our investors residing in California, under the California Consumer Privacy Act of 2018 and its regulations (“**CCPA**”) at or before the point of collection. These disclosures do not reflect our personal information handling practices with respect to California residents' personal information where an exception or exemption applies under the CCPA.

This notice applies to you if you are a California resident who invests in any of StepStone’s products or services (“**Investor**”).

### **1. WHAT CATEGORIES OF PERSONAL INFORMATION DO WE COLLECT?**

The list below sets out the categories of personal information and sensitive personal information (as defined by the CCPA) that we collect from our investors (in the following bullets, a “consumer” means an investor of ours residing in California).

#### **Non-Sensitive Personal Information:**

- Identifiers such as a real name, alias, postal address, unique personal identifier, online identifier, Internet Protocol address, email address, account name, social security number, driver's license number, passport number, or other similar identifiers.
- Any information that identifies, relates to, describes, or is capable of being associated with, a particular individual, including, but not limited to, his or her name, signature, social security number, physical characteristics or description, address, telephone number, passport number, driver's license or state identification card number, insurance policy number, education, employment, employment history, bank account number, credit card number, debit card number, or any other financial information, medical information, or health insurance information, but excluding publicly available information that is lawfully made available to the general public from federal, state, or local government records.
- Characteristics of protected classifications under California or federal law.
- Commercial information, including records of personal property, products or services purchased or other purchasing or consuming histories or tendencies.
- Internet or other electronic network activity information, including, but not limited to, information regarding a consumer's interaction with an internet website application, or advertisement.
- Geolocation data.
- Audio, electronic, visual, or similar information, including data relating to your use of computers, software, networks, communications devices, and other similar systems that: (i) we or our affiliates own or make available to you; or (ii) you connect to or use for the purposes of providing services to us or our affiliates.
- Professional or employment-related information.
- Education information, defined as information that is not publicly available personally identifiable information as defined in the Family Educational Rights and Privacy Act (20 U.S.C. Sec. 1232g; 34 C.F.R. Part 99).

- Inferences drawn from any personal information to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

**Sensitive Personal Information:**

- A consumer's social security, driver's license, state identification card, or passport number.
- A consumer's account log-in, financial account, debit card, or credit card number in combination with any required security or access code, password, or credentials allowing access to an account.
- A consumer's racial or ethnic origin.
- The processing of biometric information for the purpose of uniquely identifying a consumer.
- Personal information collected and analyzed concerning a consumer's sexual orientation.

**2. FOR WHAT PURPOSES DO WE COLLECT AND USE PERSONAL INFORMATION?**

We use non-sensitive personal information about our investors to:

- Establish and verify your identity and the accuracy of your information.
- Manage user relationship and communicate with you, including to respond to your inquiries and fulfill your requests, and for purposes of business continuity.
- Provide you with the information, products, and services you request from us and carry out our obligations arising from any contracts entered into between you and us, including to process, maintain, and service your accounts, provide user and technical support, and enable service providers to perform the services on our behalf or assist us with our provision of services to you.
- Manage and administer holdings in StepStone managed or advised funds, separately managed accounts, advisory engagements and any related business relationships (and, in each case, the investments made pursuant thereto) on an ongoing basis in accordance with the terms agreed between you and StepStone Group LP, StepStone Group Real Estate LP, StepStone Group Real Assets LP, StepStone Group Private Wealth LLC, or StepStone Group Private Debt LLC, and their subsidiaries and affiliates, as applicable.
- Measure and understand the effectiveness of our marketing campaigns and market our products and services to you.
- Engage in research and development efforts to assess the performance of our products and services, analyze usage, interests, and trends in connection with our products and services, carry out statistical analysis and market research, improve and personalize our products and services, and develop new products and services.
- Administer, facilitate, and improve operations.
- Monitor and enhance the safety and security of our website, including to prevent fraud or other unauthorized or illegal activity.
- Conduct internal audits and investigations.
- Comply with laws and regulatory requirements and respond to lawful requests, court orders, and legal processes, including applicable anti-money laundering and counter terrorist financing legislation, investor qualification legislation, and tax legislation.

- Support any claim or defense that we or our affiliates could face before any jurisdictional and/or administrative authority, arbitration, or mediation panel, as well as cooperate with or inform law enforcement or regulatory authorities to the extent required by law.
- Maintain records in compliance with all laws and regulatory requirements.

We use sensitive personal information about our investors:

- To perform the services or provide the goods reasonably expected by our investors, including those services and goods that are reasonably necessary for us to manage and administer holdings, service your accounts, provide user and technical support, and enable service providers to perform the services on our behalf or assist us with our provision of services to you.
- To establish and verify your identity and the accuracy of investor information.
- To prevent, detect, and investigate security incidents that compromise the availability, authenticity, integrity, or confidentiality of stored or transmitted personal information, including in or via our premises, computers, software, networks, communications devices, and other similar system;
- To resist malicious, deceptive, fraudulent or illegal actions directed at us and to prosecute those responsible for those actions.
- For short-term, transient use.
- To perform services on behalf of investors.
- To verify or maintain the quality or safety of our services and products.
- To improve, upgrade, or enhance our services and products.
- To perform functions that are required under laws that apply to us.
- To collect or process it where such collection or processing is not for the purpose of inferring characteristics about a consumer.

### **3. WHAT CRITERIA DO WE CONSIDER WHEN RETAINING PERSONAL INFORMATION?**

We retain each of the categories of personal information for as long as necessary for the purposes for which it was collected, including any additional time periods necessary for the compliance with laws, exercise or defense of legal rights, and archiving, back-up, and deletion processes.

#### **1. ADDITIONAL INFORMATION**

**This notice is not intended to create any rights for anyone except us and our affiliates or qualify any other notices or consents of us or our affiliates in any way.** For more information, please contact [privacy@stepstonegroup.com](mailto:privacy@stepstonegroup.com), fill out our [Contact Us](#) form on our website, or call +1-888-995-0350. Our CCPA Privacy Disclosures are available [here](#).