



As used in this notice (the “**Privacy Notice**”), “**Raine**” means (i) The Raine Group LLC, (ii) Raine Capital LLC (“**Raine Capital**”), an Investment Adviser registered with the SEC; (iii) Raine Securities LLC (“**Raine Securities**”), Raine Capital’s affiliated broker-dealer registered with the SEC and a member of FINRA; and (iv) any entity controlled by or under common control with The Raine Group LLC, excluding any portfolio companies of investment funds managed by Raine Capital.

Raine is committed to maintaining the confidentiality, integrity, and security of your personal data. This Privacy Notice describes the types of personal information we may collect about you, the purposes for which we may use the information, the circumstances in which we may share the information and the steps that we take to safeguard the information to protect your privacy. Please also refer to our Cookie Policy, which explains the use of cookies and other web tracking devices via our website. The following is intended to apply only to personally identifiable information you provide to Raine from time to time. Raine reserves the right to amend this Privacy Notice at any time in order to maintain our compliance with applicable law and regulation. We will do this by updating this notice on our website; you will not necessarily be directly notified of such a change. Therefore, please ensure that you regularly check this Privacy Notice, so you are fully aware of any changes or updates.

The changes will take effect as soon as they are posted on this website.

### **How We Collect Information About You**

In the course of Raine’s business we may need to collect and use “personal data” about you, by which we mean any information about you from which you can be identified. The personal data we collect may include contact information, such as your name, job title, address, telephone number, mobile phone number, fax number and email address, or any other personal data required for legal or compliance purposes.

We may collect personal data about you in a number of circumstances, for example when you or your organization seek financial services from us, browse and/or make an enquiry or otherwise interact on our website, attend a Raine event, and/or offer to provide or provide services to us. In some circumstances, we collect personal data about you from a third-party source. For example, we may collect personal data from your organization, other organizations with whom you have dealings, government agencies, a credit reporting agency, an information, or service provider or from a publicly available record.

You will provide us with your personal data entirely voluntarily; there are no detrimental effects for you if you choose not to provide Raine with your personal data. However, in certain circumstances it will be necessary for you to provide us with your personal data, to enable us to manage our operations, provide services to you or your organization, receive services from you, or to comply with our statutory obligations.

If you provide personal data to us about someone else (such as one of your directors or employees, or someone with whom you have business dealings), you must ensure that you are authorized to disclose that personal data to us and that, without our taking any further steps, we may collect, use, and disclose that personal data as described in this Privacy Notice. In particular, you must ensure the individual concerned is aware of the various matters detailed in this Privacy Notice, as those matters relate to that individual, including our identity, how to contact us, our purposes of collection, our personal data disclosure practices (including disclosure to overseas recipients), the individual's right to obtain access to the personal data and make complaints about the handling of the personal data, and the consequences if the personal data is not provided (such as our inability to provide services).

## Uses of Collected Information

Raine processes and stores your personal data for the following purposes (collectively, the “**Permitted Purposes**”):

- to provide our financial services as instructed or requested by you or your organization,
- to manage and administer your or your organization’s business relationship with Raine,
- to comply with our legal obligations (such as record keeping obligations), compliance screening or recording obligations (e.g., under antitrust laws, export laws, trade sanction and embargo laws, for anti-money laundering, financial and credit check and fraud and crime prevention and detection purposes), which may include automated checks of your contact data or other information you provide about your identity against applicable sanctioned-party lists and contacting you to confirm your identity in case of a potential match or recording interaction with you which may be relevant for compliance purposes,
- to analyze and improve our services and communications to you,
- to protect the security of and access to our premises, IT and communication systems, online platforms, websites, and other systems, preventing and detecting security threats, fraud or other criminal or malicious activities,
- for insurance purposes,
- to monitor and assess compliance with our policies and standards,
- to comply with our legal and regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies,
- to comply with court orders and exercises and/or defend our legal rights; and
- to communicate with you through the channels you have approved to keep you up to date on the latest market developments, announcements, and other information about Raine services and technologies (including client briefings, newsletters, and other information) as well as Raine events and projects.

You are able to opt out of any marketing-related communication sent by Raine.

Depending on for which of the above Permitted Purposes we use your personal data, we may process your personal data on one or more of the following legal grounds:

- Because processing is necessary for the performance of a client instruction or other contract with you or your organization,
- To comply with our legal obligations (e.g., records for tax purposes), or
- Because processing is necessary for purposes of our legitimate interest or those of any third-party recipients that receive your personal data, provided that such interests are not overridden by your interests or fundamental rights and freedoms.

## Disclosures of Your Personal Data

We share or disclose personal data when necessary to provide services or conduct our business operations. When we share personal data, we do so in accordance with data privacy and security requirements. We may also occasionally share non-personal, anonymized, statistical data with third parties. Below are the parties with whom we may share personal data and why:

- In order to provide efficient and reliable services and to improve service options available to you, we may share your personal information with Raine subsidiaries or affiliates. All Raine employees and contractors are required to follow our data privacy and security policies when handling personal information.

- If you are a client of Raine or are contracted to or are an agent of a client of Raine, we may also disclose your personal data to:
  - barristers, attorneys, legal counsel, solicitors, other legal specialists (including mediators), consultants or experts engaged in your matter; or
  - foreign law firms for the purpose of obtaining foreign legal advice.
- If we have collected your personal data in the course of providing financial services to you, we may disclose it for the purpose of providing specified services.
- We may share your personal data with companies providing services for money laundering checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such personal data is shared.
- We may share your personal data with any third party to whom we assign or novate any of our rights or obligations.
- We will share personal data with third parties for legal reasons when we believe it is required, such as:
  - to comply with legal obligations and respond to requests from government agencies, including law enforcement and other public authorities, which may include such authorities outside your country of residence,
  - in the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings),
  - to protect our rights, users, systems, and services; and
  - where it is reasonably necessary for the establishment, exercise, or defense of a legal or equitable claim, or for the purposes of a confidential alternative dispute resolution process.
- We will share personal data with third parties who we engage with in provision of services for Raine events (e.g., restaurants, sporting venues, travel provider, etc.), in cases where this data is necessary to provide services to you.
- We may also instruct service providers within or outside of Raine to process personal data for the Permitted Purposes on our behalf and in accordance with our instructions only. Raine will retain control over and will remain fully responsible for your personal data and will use appropriate safeguards as required by applicable law to ensure the integrity and security of your personal data when engaging such service providers.

## **Transferring Your Personal Data**

Raine is a global financial services firm, and as such we may transfer your personal data abroad if required for the purposes described above. This may include the transfer of your personal data to countries which do not provide the same level of protection as the laws of your home country (for example, the laws within the European Economic Area or United States of America (“USA”). We will ensure that any such international transfers are made subject to appropriate or suitable safeguards as required by the General Data Protection Regulation (EU) 2016/679 or other relevant laws. This includes entering into the EU Standard Contractual Clauses. You may contact us anytime using the contact details below if you would like further information about the safeguards we have in place.

All Raine offices throughout the world will at all times ensure a level of data protection at least as protective as that required in the European Economic Area and USA. We endeavor to ensure our agents, consultants and sub-contractors and others who are outside the European Economic Area or USA and to whom we transfer your personal data provide a similar level of data protection.

## **Security of Collected Information**

We use all reasonable efforts to maintain physical, electronic, and administrative safeguards to protect your personal information from unauthorized or inappropriate access, but we note that the Internet is not a secure medium. We restrict access to information about you to those Raine personnel who need to know the information to respond to your inquiry or request.

Raine welcomes your e-mail correspondence. However, it is possible that information transmitted to Raine may be read or obtained by other parties. Messages sent over the Internet cannot be guaranteed to be completely secure or error-free as they are subject to possible interception, corruption, delay, loss, or possible alteration. Raine is not responsible for them and will not be liable to you or anyone else for any damages or otherwise in connection with any messages sent by you to Raine or any message sent by Raine to you over the Internet. If you send e-mail (encrypted or not) to Raine over the Internet, you are accepting the associated risks, including lack of confidentiality.

Further, despite all possible security measures that Raine may take to keep our website free from hacking and other interference, our website, like any other website is not free from such risks. Raine disclaims all liability on account of any loss or damage that any user may suffer or incur on account of any alteration or manipulation of any data or information accessed or downloaded from this website.

While Raine endeavors to take every reasonable precaution to ensure accuracy, security, and confidentiality of information available through / on our website, Raine cannot be held responsible for any consequence of any action(s) carried out by any authorized or unauthorized user.

## **Updating your Personal Data**

If any of the personal data that you have provided to us changes, for example if you change your email address or if you wish to cancel any request you have made of us, or if you become aware we have any inaccurate personal data about you, please let us know by sending an email to [dataprivacy@raine.com](mailto:dataprivacy@raine.com). We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient, or incomplete Personal Data that you provide to us.

## **Retention of your Personal Data**

Raine will retain your personal data for as long as we are permitted to do so. Raine will, in particular, retain your personal data where required for us to assert or defend against legal claims until the end of the relevant retention period or until the claims in question have been settled.

## **Your Rights**

Subject to certain legal conditions, you have the right to request a copy of the personal data about you which we hold, to have any inaccurate personal data corrected and to object to or restrict our using your personal data. You may also make a complaint if you have a concern about our handling of your personal data.

If you wish to do any of the above, please send an email to [dataprivacy@raine.com](mailto:dataprivacy@raine.com). We may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorized disclosure of data. We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your data, and for any additional copies of the personal data you request from us.

We endeavor to respond to any requests or complaints within a month or less, although we reserve the right to extend this period for complex requests.



If you are not satisfied with our response, you may take your complaint to the relevant privacy regulator. We will provide you with details of your relevant regulator upon request.

### **Updates to this Privacy Notice**

We may change or update parts of this Privacy Notice in order to maintain our compliance with applicable law and regulation or following an update to our internal practices. We will do this by updating this notice on our website. You will not be directly notified of such a change.

Therefore, please ensure that you regularly check this Privacy Notice, so you are fully aware of any changes or updates.

Changes will take effect as soon as they are posted on our website.

### **Contacting Us**

If you have any questions about this Privacy Notice, or if you wish to access your personal information or make a complaint about the way we have collected, used, held, or disclosed your personal information, please contact us at [dataprivacy@raine.com](mailto:dataprivacy@raine.com). We welcome your questions and suggestions about our privacy policy.

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