Privacy Policy

Locke 27, LLC · Version 0.9 · Last updated October 14, 2026

Draft v0.9 pending review by counsel. Modeled on current practice among comparable private-markets platforms. Published as an interim measure so that no part of the site operates without governing terms; it will be replaced by the counsel-approved version, and members will be asked to re-accept any agreement whose terms change materially.

1. Scope

This Privacy Policy explains how Locke 27, LLC ("Locke27") collects, uses, shares and protects personal information when you visit locke27.com, apply for or use a member account, receive The Window briefing, or otherwise deal with us. A separate Financial Privacy Notice in section 9 applies to members and applicants and is modeled on the notice financial institutions give under federal law.

2. Information we collect

Information you give us: name, email, phone, mailing address, entity details, role, accreditation and qualified purchaser evidence (including CPA or adviser letters and financial statements you choose to provide), government identification and the images and data taken during identity verification, tax identification and tax forms, bank account details for linked accounts, signatures, and the content of messages you send us.

Information generated by your use of the Platform: investments, commitments, calls, distributions, listings, bids, cash movements, documents opened, preferences, authorized users, sign-in and device records, IP address, browser and operating system, and pages viewed.

Information from third parties: identity and accreditation verification results from our verification providers, bank account verification and balances from our banking and account-linking providers, information from the sponsors and administrators of funds you invest in, sanctions and watch-list screening results, and public sources used to prepare sponsor and fund information.

3. How we use it

To verify who you are and that you are eligible; to open and administer your account; to process investments, calls, distributions, cash movements and transfers; to deliver notices, statements and tax documents; to run and secure the Platform, detect fraud and unauthorized access, and keep records required by law; to communicate with you about your account and, with your consent, about the Platform and private markets; to improve the Platform; and to comply with legal and regulatory obligations, including anti-money-laundering, sanctions and tax reporting.

4. How we share it

We share personal information with: service providers who act for us, including identity and accreditation verification, banking and account linking, program banks and their sweep networks, electronic signature and document delivery, email and messaging, hosting, security and analytics; the feeder funds you invest in and their administrators, auditors and tax preparers; the sponsors of those funds, to the extent their documents require investor information; people you authorize, including authorized users on your account and anyone you create a sharing link for; professional advisers, regulators, courts and law enforcement where required or permitted by law; and a successor in a merger, acquisition or reorganization. We do not sell personal information and do not share it for cross-context behavioral advertising.

5. Cookies and analytics

The Platform uses cookies and similar technologies that are necessary for sign-in, security and your preferences. Where we use analytics to understand how the Platform is used, we use first-party measurement or providers configured not to build cross-site profiles, and we show a notice that lets you decline non-essential cookies where the law requires it. You can control cookies in your browser; disabling essential cookies will prevent sign-in.

6. Retention

We keep personal information for as long as your account is open and then for as long as we need it to meet legal, regulatory, tax, audit and record-keeping obligations and to resolve disputes. Records of securities transactions, verification and tax reporting are kept for the periods those laws require, which can be six years or longer after the relationship ends. We delete or anonymize information when it is no longer needed.

7. Security

We protect personal information with encryption in transit and at rest, passkey and one-time-code authentication, role-based access, logging and monitoring, and regular testing. No system is perfectly secure; if we learn of a breach that affects you we will notify you as the law requires. Report security concerns to security@locke27.com.

8. Your choices and rights

You can see and update most account information under Settings, export your data, and ask us to correct or delete information, subject to the records we must keep. You can opt out of marketing email through the link in any message; account and legal notices will still be sent. Residents of California and other states with privacy laws have rights to know, access, correct, delete and port their information and not to be discriminated against for exercising those rights; some of those laws exempt information

covered by federal financial privacy law. To exercise any right, email privacy@locke27.com or write to 200 Clarendon Street, Boston, MA 02116; we will verify your identity before acting.

9. Financial Privacy Notice (members and applicants)

What we collect: the categories in section 2. How we share: as in section 4, which is limited to our everyday business purposes (processing transactions, maintaining accounts, responding to legal process and reporting to regulators and credit or verification bureaus), service providers acting for us, and the funds you invest in. We do not share your nonpublic personal information with non-affiliated third parties for their own marketing, and we do not share it with affiliates for marketing, so there is no opt-out to offer under federal financial privacy law. How we protect: as in section 7. Former members: the same practices apply to information about former members.

10. Children, international and other notices

The Platform is not directed at anyone under 18 and we do not knowingly collect information from children. We operate in the United States; if you access the Platform from elsewhere your information is processed in the United States. We do not respond to browser "do not track" signals because there is no common standard, but we honor opt-out preference signals where state law requires.

11. Changes and contact

We may update this Policy and will post the new version with its date; material changes will be announced on the Platform. Questions and requests: privacy@locke27.com, or Locke 27, LLC, 200 Clarendon Street, Boston, MA 02116.