

RCM WEBSITE PRIVACY POLICY

This Privacy Policy explains what Rokos Capital Management LLP (“**RCM**”) does with two types of personal data:

1. Personal data you supply to the firm in circumstances where you apply for a job at the firm either directly or via a third party recruiter.
2. Information you supply RCM and its Investor Relations team as a prospective investor.

The policy describes how RCM collects, uses and processes your personal data, and how, in doing so, it complies with its legal obligations to you. Your privacy is important to RCM, and the firm is committed to protecting and safeguarding your data privacy rights.

Depending on your jurisdiction, the UK GDPR and Data Protection Act 2018 are applicable to the processing of personal data by RCM and various undertakings appointed by it, along with certain California laws regarding personal data.

We may amend this Privacy Policy from time to time. Please visit this page if you want to stay up to date, as RCM will publish any changes here.

If you are dissatisfied with any aspect of RCM’s Privacy Policy, you may have legal rights and, where relevant, we have described these below.

Identity and contact details of data controller

Rokos Capital Management LLP
23 Savile Row
London W1S 2ET

Please contact a representative of RCM Compliance with any queries or concerns regarding the handling of your personal data: compliance@rokoscapi.com

What kind of personal data does RCM collect?

Candidate data: In order to assess you for employment opportunities, RCM needs to process certain information about you. RCM only asks for details that will genuinely help to assist in this process, such as your name, contact details, education details, employment history, emergency contacts, immigration status, financial information (where we need to carry out financial background checks) social security number as well as verbal and written references. Where appropriate and in accordance with local laws and requirements, we may also collect information related to your health (such as where we collect diversity data as outlined below) and any criminal convictions. RCM may also, with your consent, collect information relating to your health, age, gender identity, sexual orientation, religion and ethnicity in order to monitor our diversity, equity and inclusion (D,E&I) efforts in the context of our recruitment practices and to provide reasonable accommodations and adjustments to candidates with disabilities. This information is collected on an entirely voluntary basis.

Prospective investor data: In order to provide you with information about RCM and its funds and associated investment opportunities it may be necessary for RCM to process certain personal information such as names, telephone numbers and email addresses and any personal identification documents you supply in order to confirm your identity.

How does RCM collect Personal Data?

RCM may collect personal data through a range of means. These may include:

- a) direct interactions (where you provide personal data to RCM through telephone or email correspondence or other direct methods of communication, including applications to invest in RCM's funds or for prospective employment);
- b) from third parties such as intermediaries and banks in the case of prospective investors or third party recruitment firms in the case of prospective employees;
- c) other publicly available sources (such as a websites (for example, LinkedIn) or publicly-available registries (for example, FCA or other regulatory registers)); and
- d) in the case of prospective candidates your personal referees may share personal information about you with RCM.

RCM's website uses cookies. By continuing to use RCM's website you are giving consent to cookies being used. For information on cookies and how you can disable them, please visit our Cookies Policy at [RCM Cookie Policy](#).

Please be aware that if you visit RCM's offices CCTV is in use for security purposes and that you will be recorded in public areas of the office.

How does RCM use your personal data?

Candidate data: Your personal details are used by RCM to help us (a) assess your suitability for roles that you have applied for either directly or via a recruiter; (b) provide any reasonable accommodations or adjustments where relevant; (c) monitor our D,E&I efforts in our recruitment practices; (d) carry out background checks, verification and referencing on you as a candidate (e) carry out RCM's obligations relating to any potential contracts entered into between RCM and you; and (f) to comply with legal or regulatory obligations applicable to RCM.

We are entitled to use candidate data in these ways because:

- we need to in order to take steps in preparation for entering into a contract with you, in particular to consider you for a position at RCM;
- to the extent this is required by applicable data protection laws and regulations, we have separately asked you for your consent and provided information as to what happens if you do not give consent;
- we have legal and regulatory obligations that we have to discharge;
- we may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; and/or
- the use of your personal data as described is necessary for our legitimate business interests, such as:
 - allowing us to effectively assess your skills, qualifications and/or the strength and merits of your application and your suitability for the role applied for;
 - allowing us to effectively verify your information;
 - allowing us to effectively and efficiently administer and manage the operation of our business;
 - ensuring a consistent approach to the recruitment of RCM personnel worldwide; or

- being able to contact you in relation to your application and the recruitment process.

Please note, if your application is successful and you are subsequently offered and accept employment at RCM, the information we collect during the application and recruitment process will become part of your employment record.

The provision and processing of your personal data is necessary for RCM in the context of your potential employment. Without the ability to process your personal data, RCM would not be able to assess you for employment at the firm. RCM will not discriminate automatically against any subject of a criminal record check on the basis of a conviction or other information revealed.

Prospective investor data: information about prospective investors is used by RCM (a) for the purposes of discussing and reviewing potential investments in RCM funds (b) assessing an investor's appropriateness to invest in the fund as an unregulated collective investment scheme (c) to carry out RCM's obligations relating to contracts to be entered into between RCM funds and you; (d) for the general administration of potential investments into the RCM funds; and (e) to comply with legal or regulatory obligations applicable to RCM.

We are entitled to use prospective investor data in these ways because:

- we need to in order to take steps in preparation for entering into a contract with you;
- we have legal and regulatory obligations that we have to discharge;
- we may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; and/or
- the use of your personal data as described is necessary for our legitimate business interests, such as:
 - allowing us to effectively assess your appropriateness to invest in the fund;
 - allowing us to effectively verify your information;
 - allowing us to effectively and efficiently administer and manage the operation of our business;
 - ensuring a consistent approach to our investors worldwide; or
 - being able to contact you in relation to your prospective investments.

In order to ensure RCM provides you with efficient investor relations service and access to information about RCM and its funds, RCM will store your personal data and/or the personal data of individual contacts at your organisation as well as keeping records of conversations, meetings and investor preferences. The provision and processing of your personal data is necessary for RCM in the context of your potential interest in the fund. Without the ability to process your personal data, RCM would not be able to assess you as suitable to invest in the fund.

As a matter of practice, we will seek to limit the sensitive personal data (for example data concerning health, racial or ethnic origin or political opinions) about you we collect and process. If there is a need for us to process such sensitive personal data for purposes of the employment relationship with you (for example where we would need to know about any disabilities to provide a suitable workplace environment or for tax purposes), we will only process such sensitive personal data in strict compliance with applicable laws and regulations. Likewise, if you have provided your freely given consent for the processing of certain sensitive personal data (for example, in relation to voluntary

D,E&I questionnaires), we will also only process such sensitive personal data in strict compliance with the consent that you provide, as well as applicable laws and regulations.

Who does RCM share your personal data with?

Candidate data: Your personal data will be shared internally with any of RCM's group companies for the purposes of candidate selection and appointment. Your personal data will also be shared with inter alia third party suppliers who provide screening and testing services to the firm as well as legal, tax and HR advisers and third party recruiters. If references are sought RCM will also share your personal data with previous employers and referees.

Prospective investor data: RCM will share personal data on prospective investors with inter alia the fund boards, administrators to the funds, legal, tax and accounting advisers as well as third party financial intermediaries in certain instances.

Personal data will only be disclosed by RCM to a third party in circumstances where that third party has agreed to respect the security of personal data and treat it in accordance with applicable law. Third parties to whom any personal data may be disclosed will be permitted to use personal data only as described in this policy and they will only be permitted to process personal data for specified purposes and otherwise in accordance with the instructions of RCM.

Transfer of Personal Data outside the UK and European Economic Area

RCM may transfer your personal data to other RCM companies based outside of the UK and the European Economic Area (the "**EEA**").

Where RCM transfers personal data outside the UK and EEA, it will seek to ensure a similar degree of protection is afforded by ensuring that personal data is transferred only to persons in countries outside the UK and EEA in one of the following circumstances.

- To persons and undertakings in countries that have been deemed to provide an adequate level of protection for personal data by the UK government.
- To persons and undertakings to whom the transfer of such personal data is made pursuant to a contract that is compliant with the model contracts for the transfer of personal data to third countries from time to time approved by the UK government.

In other circumstances the law may permit us to otherwise transfer your personal data outside the UK and EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with applicable data protection law.

You can obtain more details about the protection given to your personal data when it is transferred outside the UK and EEA by contacting us in accordance with the "**Identity and contact details of data controller**" section.

How does RCM safeguard your data?

RCM has in place security measures to prevent personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. These security measures include procedures to deal with any suspected personal data breach. RCM will notify any affected person and any applicable regulator of any personal data breach in circumstances where they are required to do so by applicable law.

How long does RCM retain your personal data for?

Candidate data: If your candidature does not proceed to employment with, or hiring by, RCM it will retain your personal details for a period of six months after the position you may be suitable for is

filled. After that point RCM's policy is to delete your personal data from its systems unless RCM believes in good faith that the law or other regulation requires RCM to preserve it (for example, because of our obligations to tax authorities or in connection with any anticipated litigation) or if RCM considers that you may be suitable for an alternative role for which it is hiring. If you do receive an offer of employment with RCM, further details shall be provided to you in or around the time of your hire, regarding how your personal data may be used for the purposes of your employment.

Prospective investor data: In order to comply with legal and regulatory obligations regarding the proper classification and identification of potential investors in funds which are unregulated collective investment schemes your personal details will be retained by RCM for a period of six years after the last contact with you. After that point RCM will delete your personal data from its systems unless RCM believes in good faith that the law or other regulation requires RCM to preserve it (for example, because of RCM's obligations to tax authorities or in connection with any anticipated litigation). In some circumstances, RCM may decide to retain anonymized personal data for research or statistical purposes, in which case such information may be retained and utilised indefinitely without further notice.

How can you access, amend or take back the personal data that you have given to RCM?

You have various rights in relation to your personal data. To get in touch about these, please email compliance@rokoscapital.com. RCM will seek to deal with your request without undue delay, and in any event in accordance with the requirements of any applicable laws. Please note that RCM will keep a record of your communications to help it resolve any issues which you raise.

You have the right to obtain information regarding the processing of your personal data and request access to any personal data concerning you that RCM is processing. Whilst RCM takes efforts to ensure that all personal data that it processes is accurate and up-to-date, you may ask RCM to rectify any inaccurate or incomplete personal data concerning you and RCM will do so without undue delay. In the event RCM relies on consent to process any of your personal data, you have the right to withdraw your consent to the processing of your personal data at any time. Please note, however, that RCM may still be entitled to process your personal data if we have another legitimate reason for doing so. For example, RCM may need to retain personal data to comply with a legal obligation and as noted in this privacy notice, RCM relies mainly on its legitimate interests to process your personal data. You may, in certain circumstances, request that RCM erase your personal data and/or request that RCM restricts, or you object to, RCM's processing of your personal data if certain criteria apply. Please note that there may be circumstances where you ask us to erase your personal data, or where you object to or request we restrict, our processing of your personal data, but we are legally entitled to retain it. You have the right in certain circumstances to data portability. This means that, in those circumstances, you have the right to receive from RCM any personal data concerning you in a structured, commonly used and machine-readable format, and may request that RCM transmit it directly to another data controller, where technically feasible. Please note that this right only applies to personal data which you have provided directly to RCM. Should you have any concerns about how RCM processes your personal data you should contact RCM at the email address above. You also have the right to lodge a complaint with the Information Commissioner's Office if you think that any of your rights have been infringed by us.

Incidental personal data processed via email

In the process of providing our investor relations service and information about RCM and its funds, RCM may receive certain personal data, such as the name, address, email and/or telephone number of a financial adviser or other contact of prospective investors. In such circumstances, the personal data of that contact may be retained on a general contact database that is maintained by RCM, or in RCM's email storage system, for as long as is necessary to process the personal data for the purpose for which RCM is using it, or to comply with our legal obligations. Such personal data will only be

processed by RCM’s employees in compliance with RCM’s data protection and data security policies and procedures.

California information and rights

This section of the Privacy Policy provides information regarding our practices related to the personal data of California residents and the rights residents of California may have regarding their personal data.

This California Information and Rights section does not apply to information we collect about employees or independent contractors.

The following chart describes the categories of personal data that we disclosed to third parties for a business purpose in the 12 months prior to the date of this Policy:

Categories of personal data we collect	Categories of third parties with which we shared personal data for a business purpose
Personal identifiers: Name, address, email address, telephone numbers, IP address or other unique identifier, and other similar information.	Service providers that provide customer relationship management (CRM) services, assist us in operating, analysing, and displaying content on our website, or provide analytics information; fund boards; administrators to the funds; legal, tax and accounting advisers; third party financial intermediaries; and third parties that provide website hosting, webcast and teleconference services.
Internet or other electronic network activity information: Device and browser type, browsing and search history on our website, and information regarding interaction with our website.	Service providers that provide data security services and cloud-based data storage; host our sites and assist with other IT-related functions; provide website hosting, webcast and teleconference services; advertise and market our products; and provide analytics information.
Educational information: Information about your educational history, degrees and credentials.	To the extent relevant to candidates, third party suppliers who provide screening and testing services to the firm; legal, tax and HR advisers; and third party recruiters. If references are sought, RCM will also share your personal data with previous employers and referees.

We may also share your personal data as required or permitted by law to comply with a subpoena or similar legal process or government request, or when we believe in good faith that disclosure is legally required or otherwise necessary to protect our rights and property or the rights, property or safety of others, including to law enforcement agencies, and judicial and regulatory authorities. We may also share your personal data with third parties to help detect and protect against fraud or data security vulnerabilities. And we may transfer your personal data to a third party in the event of an actual or contemplated sale, merger, reorganisation of our entity or other restructuring. We do not sell your personal data.

We are committed to ensuring that you know what personal data we collect. To that end, you can ask us for any or all of following types of information regarding the personal data we have collected about you in the 12 months prior to our receipt of your request:

- specific pieces of personal data we have collected about you;
- categories of personal data we have collected about you;

- categories of sources from which such personal data was collected;
- categories of personal data that the business sold or disclosed for a business purpose;
- categories of third parties to whom the personal data was sold or disclosed for a business purpose; and
- the business or commercial purpose for collecting or selling your personal data.

Upon your request, we will delete the personal data we have collected about you, except for situations where the law authorises us to retain specific information, including when it is necessary for us to provide you with a good or service that you requested; perform a contract we entered into with you; maintain the functionality or security of our systems; or comply with or exercise rights provided by the law. The law also permits us to retain specific information for our exclusively internal use, but only in ways that are compatible with the context in which you provided the information to us or that are reasonably aligned with your expectations based on your relationship with us. We will act on your deletion request within the timeframes set forth below.

To exercise any of the rights above, or to ask a question, use the contact details set out in this Policy. For requests for access or deletion, we will first acknowledge receipt of your request within 10 business days of receipt of your request. We will provide a substantive response to your request as soon as we can, generally within 45 days from when we receive your request, although we may be allowed to take longer to process your request under certain circumstances. If we expect your request is going to take us longer than normal to fulfil, we will let you know. We usually act on requests and provide information free of charge, but we may charge a reasonable fee to cover our administrative costs of providing the information in certain situations. In some cases, the law may allow us to refuse to act on certain requests. When this is the case, we will endeavour to provide you with an explanation as to why. If you exercise any of the rights explained in this California Information and Rights section, we will continue to treat you fairly. If you exercise your rights under the California Information and Rights section, you will not be denied or charged different prices or rates for goods or services, or provided a different level or quality of goods or services than others.

We will ask you for identifying information and attempt to match it to information that we maintain about you. Where possible, we will attempt to verify your identify by asking you to confirm information that we have on file about your or your interactions with us. Where we must ask for additional personal data to verify your identity, we will only use it to verify your identity or your authority to make the request on behalf of another person. If we are unable to verify your identity with the degree of certainty required, we will not be able to respond to your request. We will notify you to explain the basis of the denial.

You may designate an agent to submit requests on your behalf. The agent must be a natural person or a business entity that is registered with the California Secretary of State. If you would like to designate an agent to act on your behalf, you and the agent will need to comply with our verification process. If the agent submits requests to access, know or delete your personal data, the agent will need to provide us with your signed permission indicating the agent has been authorised to submit the opt-out request on your behalf. We will also require that you verify your identity directly with us or confirm with us that you provided the agent with permission to submit the request.

Please note that this subsection does not apply when an agent is authorized to act on your behalf pursuant to a valid power of attorney. Any such requests will be processed in accordance with California law pertaining to powers of attorney.

California Civil Code Section 1798.83, also known as the “Shine the Light” law, permits California residents that have an established business relationship with a business to annually request, free of charge, information about certain categories of personal data a business has disclosed to third parties for those parties’ direct marketing purposes in the preceding calendar year. However, we have not disclosed your personal data to third parties for those third parties’ direct marketing purposes.

Some browsers have a “do not track” feature that lets you tell websites that you do not want to have

your online activities tracked. At this time, our sites do not respond to browsers' do not track signals.

December 2022