

## 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.

The EU General Data Protection Regulation (Regulation (EU) 2016/679) (together with applicable implementing laws, “GDPR”) is applicable to the processing of personal data by RCM and various undertakings appointed by it.

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@rokoscapital.com](mailto:compliance@rokoscapital.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, age, gender, 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 and any criminal convictions.

**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 does not collect information about you via its website or use cookies.

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) carry out background checks, verification and referencing on you as a candidate (c) to carry out RCM's obligations relating to any potential contracts entered into between RCM and you; and (d) to comply with legal or regulatory obligations applicable to RCM.

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 and therefore RCM has a legitimate interest in processing your personal data as part of its pre-employment screening.

**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.

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 and therefore RCM has a legitimate interest in processing your personal data as part of its investor screening activities.

### **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 European Economic Area*

RCM does not currently transfer and/or process your personal data outside the European Economic Area (the “EEA”). The activities of RCM and its control or processing of personal data are such that it may be necessary for personal data to be processed outside the EEA in the future.

If in future RCM transfers personal data outside the 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 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 European Commission.
- 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 European Commission.
- To persons and undertakings based in the United States if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between Europe and the United States.

#### **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](mailto: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. 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. You may, in certain circumstances, request that RCM erase your personal data. You may also 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.

May 2019