

## Privacy Notice

The purpose of this Privacy Notice is to explain how 36 South Capital Advisors LLP (“36 South”, “we”, “us”, “our”) and its affiliates may process your Personal Data. The term “process” here refers broadly to the collection, use, storing, amendment, sharing, or any other handling of your Personal Data.

In accordance with the General Data Protection Regulation (“GDPR”) we have certain obligations around how we process and protect your Personal Data, whilst you have certain rights in relation to your Personal Data that we process.

It is important that you read this notice in full. It provides important information about your rights. It also explains how we will seek to protect your Personal Data in accordance with our legal obligations.

## Volatility Investing and 36 South Capital Advisors LLP

Volatility Investing is a series of educational events. These events provide an opportunity for investors and experts in the field of volatility investing to share ideas and research, and to learn from one another through dialogue and debate.

Volatility Investing is run by 36 South Capital Advisors LLP, an investment manager based in London, UK. We are assisted in our management of the events by AZR Capital Limited, and we have a website about the events, which is hosted by Know Digital.

In relation to any Personal Data that we collect and process, we are a “Data Controller”. In relation to any Personal Data which is processed by AZR Capital Limited, Know Digital, or any other affiliates or delegates, they will be “Data Processors”.

If you have any questions about the contents of this notice, you can contact us at Berkeley Square House, London, W1J 6BU or [compliance@36south.com](mailto:compliance@36south.com)

## What is Personal Data?

Under GDPR, “Personal Data” is broadly defined to include any information relating to an identified or identifiable natural person (the ‘Data Subject’).

If you plan to attend one of our events, or if you participate as a speaker or panel member, we may collect and process your Personal Data, including your name, the country in which you are based, telephone number, personal and/or work email address, company and job title.

## **Why Are We Collecting Your Personal Data and How Will We Use Your Personal Data?**

GDPR provides a number of legal bases upon which it may be permissible for us to collect and process Personal Data.

Specifically, we may process Personal Data where we have a legitimate interest in running the Volatility Investing events, which is not overridden by your interests, fundamental rights or freedoms, provided that we are acting in a fair, transparent and accountable manner, and provided that we have taken appropriate steps to prevent such activity having any unwarranted impact on you (please also be aware that you a right to object to our processing of your data, as discussed below).

We will only process Personal Data to the extent required to run the Volatility Investing events, and for the purpose of providing you with information about our Funds, in the event that you are not already a recipient of such information.

In the event that we intend to process your Personal Data for any purpose other than that for which it was collected, we would inform you prior to any further processing.

In practice, we will collect Personal Data so that we can maintain a register of attendees and participants, and for other logistical tasks associated with running the events. When registering for an event via the Volatility Investing website, you will be asked to provide Personal Data such as your name, job title, company, country, telephone number and email address. If you participate as a speaker or panel member, we will process Personal Data, including that listed above, as part of our day to day interactions with you.

If you participate as a speaker or panel member, we may exhibit your Personal Data including your name, company and job title on the Volatility Investing website

For those of you who are not already a recipient of information about the funds managed by 36 South Capital Advisors, we may also get in touch to provide such information. If we do get in touch, however, and you do not wish to receive information about our funds, please just let us know and we will (1) cease to provide any such information; and (2) if you so wish, we will delete any personal data we hold on you (see below for further information).

## **What Happens If You Do Not Provide Us With Your Personal Data?**

You are under no obligation to provide us with your Personal Data. However, if you do not provide us with certain Personal Data as requested for event registration, it is unlikely that you will be able to attend or participate in an event. This is because, for logistical purposes, it is necessary to maintain a register of attendees and participants. We also need to identify all attendees, to ensure that only appropriate persons attend the events.

## **Will We Share Your Personal Data With Anyone?**

As noted above, we are assisted by AZR Capital Limited in running the Volatility Investing events. Your Personal Data may therefore be shared with AZR Capital Limited and its personnel. We are also supported by sponsor hedge fund managers as well as sponsoring banks and exchanges. We may share your Personal Data (excluding your email address and telephone number) with these sponsors.

We are assisted in our operation of the Volatility Investing website by Know Digital Limited, and the registration page of the website is supported by a third party server providers used by Know Digital. In relation to any Personal Data processed by these persons, they will be data processors.

### **Transfers of your Personal Data outside the European Economic Area (EEA).**

Under GDPR, we are only permitted to transfer your data outside the EEA if we do so in accordance with certain conditions.

For example, we may transfer Personal Data outside the EEA if there is an “adequacy decision” in place between the EC and the country or organisation in question.

The servers used by the website provider are located in the US. Those companies are covered by the US Privacy Shield and thus any Personal Data transferred to these entities will be done so in accordance with an adequacy decision.

### **How Long Will We Hold Your Personal Data?**

We may retain your details in order to provide you with information about future events. However, if you do not want us to hold your Personal Data any longer, you can contact us any time at [compliance@36south.com](mailto:compliance@36south.com) and ask us to delete any Personal Data we hold on you. Please see the section below entitled “Your Rights” for further information.

### **Your Rights.**

You have a number of rights in relation to any Personal Data we hold on you. If you would like to exercise any of your rights, please contact us at [compliance@36south.com](mailto:compliance@36south.com)

You have a right to access any Personal Data we hold on you.

You have a right to correct any of your Personal Data which is inaccurate.

Under certain circumstances, you have a right to obtain a restriction on our processing of your Personal Data.

Under certain circumstances, you have a right to object to our processing of your data, where we have collected and processed your Personal Data for the purposes of our legitimate interests.

Under certain circumstances, you have a right to obtain the erasure of any Personal Data we hold on you.

Where you have contacted us to exercise your rights, we will provide you with information on the actions we have taken in response. We will normally provide you with such information free of charge.

### **What Might We Need From You?**

If you request access to your Personal Data, or if you seek to exercise your rights, we may ask you for information to verify your identity before providing a response.

We will do this to ensure that your Personal Data is adequately protected. It is vital that your Personal Data is not disclosed to any person who does not have a right to receive it.

**Your Right to Complain.**

If you ever have any concerns about the way we are processing your data, or if you are concerned that your data is not being adequately protected, you have the right to make a complaint about us to the relevant supervisory authority for data protection.