

PRIVACY POLICY

Introduction

Volpi Capital LLP is committed to protecting your personal data and your privacy. We endeavour to ensure that any personal data we collect about you will be held and processed strictly in accordance with applicable data protection legislation, including on and from 25 May 2018, the European General Data Protection Regulation (GDPR) and any applicable local laws implementing or adopting the GDPR including the Data Protection Act 2018 in the UK, the Data Protection (Jersey) Law 2018 and Data Protection (Bailiwick of Guernsey) Law, 2017 (Applicable Local Laws). The terms Personal Data, Data Controller and processing have the meanings given to them in the GDPR unless otherwise indicated.

Scope

This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. (**Your Data**).

Collection and Use of Personal Information

We may collect and maintain personally identifiable information about you, including but not limited to your name, address, e-mail address and phone number, business affiliation and other relevant personal details ("Personal Information"). Personal Information may be collected when you access our website or any other site we use, enquire about our business, speak, meet or correspond with our employees or representatives, subscribe to a service, search for a publication, or otherwise interact with us.

This statement does **not** apply to:

- (a) the collection and processing of Personal Data about our employees. For information about privacy in the context of doing work for Volpi Capital LLP, please see the Employee handbook.
- (b) the collection and processing of Personal Data in relation to job candidates or applications for roles advertised on this website.
- (c) the collection and processing of Personal Data on our suppliers or service providers.

What we use Your Data for

We use Your Data for the following purposes:

- (a) in order to comply with our legal obligation such as to carry out Anti-Money Laundering Checks on you or to comply with our obligations to the Financial Conduct Authority;
- (b) in order to provide marketing communications to you (but only where we have obtained your consent to do so);
- (c) for our legitimate business interests such as for internal record keeping purposes or to manage our client relationship with you;

Any Special Category Data we hold about you will only be processed so far as necessary in order to comply with our legal requirements.

Who we share Your Data with

We will never sell Your Data. We will not disclose Your Data to other parties, save with your consent or where we are legally (or by FCA or other regulations) required to do so. It is sometimes necessary to share information, including Your Data, with third parties who are providing you with advice or other professional services ancillary to the services we are providing. For example, we may share certain

information with the fund, the fund administrator, fund auditor, fund manager, bank or depository, in order to provide our services or to permit them to provide theirs.

International Transfers

As required by the Act, we have strict security procedures regarding the storage and disclosure of Personal Information. The Personal Information collected by us may be transferred to, and stored at, one or more destinations outside the European Economic Area ("EEA"). It may also be processed by staff operating outside the EEA who work for us or a third-party service provider. Such staff may be engaged in, among other things, the provision of support services. By providing us with Personal Information you agree to the international transfer, storing and processing of that Personal Information as set out in this Privacy Statement.

Identity and Contact Details of Data Controller

For the purposes of Applicable Local Laws and the GDPR, Volpi Capital LLP is the controller of Your Data. The 'Data Controller' is the entity that is responsible for deciding how we hold and use your personal data.

If you have any queries regarding this policy or complaints about our use of Your Data, please contact us at info@volpicapital.com or at the address below and we will do our best to deal with your complaint or query as soon as possible.

Volpi Capital LLP
207 Sloan Street
London
SW1X 9QX
FAO: Data Processing

Retention Period

Unless otherwise indicated below, we retain your Personal Information for no longer than is necessary and reasonable in relation to the data's intended purpose. After this time it will be destroyed unless we have identified a lawful purpose(s) for which we need to keep Your Data longer or you request that we keep it for longer. If we feel that we may need to keep Your Data for longer than the lawful purposes for which it was obtained, we will contact you to obtain your consent to such longer period.

Your Rights in relation to Your Data

Under the GDPR, you will have the following rights in relation to how we process Your Data:

- (d) right to request access – you may obtain confirmation from us as to whether or not Your Data is being processed and, where that is the case, access to Your Data;
- (e) right to rectification – you have the right to obtain rectification of inaccurate personal data we hold concerning you;
- (f) right to erasure – you have the right to obtain the erasure of Your Data without undue delay in certain circumstances
- (g) right to restriction of processing or to object to processing – you may require us to restrict the processing we carry out on Your Data in certain circumstances or to object to us processing Your Data;
- (h) right to data portability – you have the right to receive Your Data in a structured, commonly used and machine-readable format;
- (i) right to withdraw consent – where you have provided your consent to us processing Your Data (for example, for marketing purposes), you have the right to withdraw your consent at any time. This can be done by emailing info@volpicapital.com at any time or by clicking the "unsubscribe" link on any marketing communications you receive from us;

- (j) right to lodge a complaint – you may lodge a complaint with any supervisory authority in the EU. The relevant supervisory authorities for the UK are set out below and their websites contain the relevant contact details:

United Kingdom - the Information Commissioner's Office whose contact details can be found on their website which can be viewed here - <https://ico.org.uk/>

For further information on your rights, please see the relevant supervisory authority's website.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, altered, disclosed, used or accessed without authorisation. In addition, we restrict access to your personal data to those employees, agents, contractors, consultants and other third parties who have a business need to access the data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally obliged to do so.

Additional Information

This Privacy Notice sets out our current policy as regards the maintenance and processing of personal data. It does not form, and should in no way be construed as, a contract and no contractual rights or causes of action shall arise in relation to or consequence of the content of this Notice.

We keep our privacy policy under constant review and may change it from time to time to reflect our practices or to remain compliant with relevant legislation. We will notify you of any material changes to our privacy policy via a notification on our website. Your continued use of our services, following the posting of changes to these terms, will mean you accept these changes.

We reserve the right to change this Privacy Statement and any other relevant policies or procedures at any time. Any changes we may make to this Privacy Statement will be posted on this page and you should regularly check and review the Privacy Statement to ensure you understand how we may be processing Personal Information. Any changes we may make to the Privacy Statement (which will, unless otherwise indicated, apply to Personal Information already obtained before the changes were made) will be effective from the date on which those changes have been posted on this page. Where we decide it is appropriate to do so, we may also notify you of any changes we have made by e-mail.

Last updated: 19 June 2018