

ROCKHOPPER Algorithmics

Privacy Notice

MAY 2018

Rockhopper Algorithmics Jersey Ltd. and its affiliates (collectively, "Rockhopper", "we", "us", or "our") have created this Privacy Notice and Policy in order to demonstrate our firm commitment to the privacy of any natural person who is a) a Rockhopper client and/or prospective client, b) a director, officer, partner, shareholder, employee, agents, trustee, consultant, contractor and/or service provider of Rockhopper, and c) any other individual from whom Rockhopper collects personal data during the course of its business activities.

Rockhopper Algorithmics is an emerging quantitative hedge fund incorporated in Jersey (Channel Islands), with a subsidiary in London and a proprietary fund domiciled on the Cayman Islands.

This Privacy Notice describes the personal data we collect, how Rockhopper will manage your personal data, with whom we may share such data and how you can contact Rockhopper, access your personal data and exercise your rights regarding Rockhopper's use of your personal data.

What type of information do we process?

Information in the norm include name, postal address, email address, phone number, nationality, country of residence, areas of expertise, employee, and any other transactional and financial information required to provide our services or conduct business with you.

We do not usually process sensitive personal data.

Information is obtained either from you or is public knowledge.

Any personal data will be held in confidence and processed in accordance with relevant data protection legislation or regulation, and with effect from the 25th of May 2018, insofar as relevant, the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016) (GDPR), including any amendments thereto.

How will your information be used

Rockhopper stores and processes your personal data for certain legitimate business purposes/interests which may include some or all of the following:

- to administer and manage our relationship with you
- to effectively and efficiently administer and manage the operation of our business
- to evaluate, review, approve, or enter into potential contractual arrangements
- to comply with certain obligations under applicable law, industry guidelines and internal policies such as AML regimes or protection of fraud regulations

Disclosure of your information to third parties

We may transfer your personal data to our affiliates and to the Rockhopper Funds where this is required for the provision of our services such as:

- the management and administration of our business, our affiliates' business and the business of the Rockhopper Funds
- assessing compliance with applicable laws, rules and regulations, and internal policies and procedures across our business and our affiliates' businesses
- where your personal data is held as part of an internal directory, enabling adequate communication with you as well as the administration and maintenance of databases which store personal data relating to you.

Rockhopper will only grant access to personal data on a need-to-know basis, and such access will be limited to the personal data that is necessary to perform the business function for which such access is granted. No authorization will be extended to access personal data on a personal basis.

We may also share your personal data with external third parties for the following purposes:

- to third party agents and contractors for the purposes of providing services to us, including IT providers, law firms, accountants and auditors. These third parties will be subject to confidentiality requirements and they will only use your personal data as described in this privacy notice

Rockhopper will process your personal data in accordance with applicable law and professional regulations in your jurisdiction.

Other than the above we will not transfer your personal data to third parties unless we have your permission or are required by law to do so.

How long do we retain personal data?

We will retain your personal data for as long as your client relationship or any other business relationship with Rockhopper is active and as needed to provide you with products or services. All personal data will be retained in compliance with privacy laws and regulations and personal data will not be retained for longer than required.

Is the personal data secure?

Rockhopper is committed to making sure that your personal data is secure. All information is stored in proprietary systems or files and to prevent unauthorized access or disclosure we have strong technical and organizational measures to safeguard and secure your personal data.

What are your rights?

You are legally entitled to request details of the personal data we hold about you.

You are entitled to confirm your personal data is accurate and current. You can among others request rectification, erasure or restriction of processing by contacting your usual Rockhopper contact or by sending an email to info@rockhopper-algorithmics.com.

Notice of Changes

Rockhopper reserves the right to update or change this Privacy Notice or any part of it from time to time without prior notice. Rockhopper encourages you to review this Privacy Notice periodically for changes. You may at any time contact us to request a copy of this Privacy Notice.

Contact Information

If you have any questions regarding this Privacy Notice or are concerned about an alleged breach of privacy law please contact Rockhopper's Data Protection Officer.

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