

# Privacy Notice

Coriolis Capital Limited (“Coriolis”, “us”, “we” or “the Firm”), is an investment firm based in the UK. We understand and respect the importance of your privacy and below we explain:

- I. what information we collect about you
- II. who is collecting data
- III. how we will use this information
- IV. marketing
- V. how data is stored and who it could be shared with
- VI. your rights and how to exercise them
- VII. other websites
- VIII. changes to this Privacy Notice

## **(i) What information we collect about you**

For the purposes mentioned in the following paragraph “How we will use this information” we collect the following categories of personal data when you register on our website, request to receive our fund monthly reports or request to receive general updates about our funds:

- Name
- Contact details (telephone number, email address and postal address)

## **(ii) Who is collecting data**

Coriolis is a Data Controller and our business address and our general contact details are as follows:

Coriolis Capital Limited  
23 Austin Friars  
London  
EC2N 2QP

Tel: +44 (0)20 3159 5226  
Email: [info@corioliscapital.com](mailto:info@corioliscapital.com)

Kristy McMillan is the Compliance Officer of our Firm and is responsible for data protection issues. She can be contacted by the following methods:

Email: [kristy.mcmillan@corioliscapital.com](mailto:kristy.mcmillan@corioliscapital.com)  
Telephone: +44 (0)20 3159 5231  
Post: Kristy McMillan  
Coriolis Capital Limited  
23 Austin Friars  
London  
EC2N 2QP

## **(iii) How we will use this information**

We will use this information for the following purposes:

- a. to provide the services you have requested and send you regular updates

- b. to allow you access to the secure area of our website where we provide detailed information about funds that we advise.

If you no longer wish to receive these notifications or have access to this information, you can opt out at any time by sending an e-mail to this address:

**kristy.mcmillan@corioliscapital.com**

**(iv) Marketing**

We would like to send you information about new funds and other services which may be of interest to you. If you have consented to receive marketing, you can opt out at a later date.

You have a right at any time to stop us from contacting you for marketing purposes.

If you no longer wish to be contacted for marketing purposes you can opt out at any time by sending an e-mail to this address:

**kristy.mcmillan@corioliscapital.com**

**(v) How data is stored and with whom it could be shared**

Data is recorded on paper and IT systems. Basic personal data such as name, email address, telephone number and business postal address will be stored on our CRM system which is accessible to all employees for the above-mentioned purposes.

If you are an investor in our funds, your Data may be subject to cross-border transfers to Jersey, Channel Islands as permitted under the adequacy decision (Art.45 General Data Protection Regulation). The funds that we advise are domiciled in Jersey, Channel Islands and the service providers to these funds (members of the Sanne Group) are the administrator, manager, trustee and corporate secretary to these funds, who are also domiciled in Jersey, Channel Islands..

We will only share your information with third party companies when:

- you agree for us to share this information with third party companies to receive marketing material from them
- sharing your information with third party companies (such as our suppliers) is necessary to perform the services you have requested from us

Without prejudice to any communications made to comply with legal or contractual obligations, data may also be disclosed to external parties as required by laws or regulations (e.g. court, tribunal, Regulatory Authority or Governmental Entity).

When we share your information with contracted Third Party companies we take all reasonable steps to ensure that your information and privacy are protected in line with the applicable legal obligations.

Data will only be stored for as long as you indicate that you wish us to remain in contact with you.

## **(vi) Your rights and how to exercise them**

You have the right to determine how we use your data and to oppose to the purposes of processing at any time. You have the right to withdraw your consent at any time, without affecting the lawful processing of data based on consent up to the point of its withdrawal. Consent can be withdrawn at any time.

We remind you that you have the right to request from us access to and rectification or erasure of personal data, or a restriction of processing, or to object to processing of data concerning you.

You also have the right to receive your personal data that you provided to us in a structured, commonly used and machine-readable format and have the right to transmit such data to another controller without hindrance from us. In exercising your right to data portability, you have the right to have your personal data transmitted directly from a controller to another, where technically feasible.

You can contact us to exercise your rights at the address mentioned in section (ii) above, or by sending an email to:

**kristy.mcmillan@corioliscapital.com**

If you consider that the processing of your personal data infringes applicable data protection laws, as data subject you have the right, without prejudice to any other administrative or judicial remedy, to lodge a complaint with a supervisory authority, in particular, in the Member State of your habitual residence, place of work or place of the alleged infringement.

The Supervisory Authority for the Member State that we are located in and where we control and process your data is the Information Commissioners Office (ICO) who can be contacted via their hotline 0303 123 1113 or through the Concerns section of their website - <https://ico.org.uk/concerns/>.

## **(vii) Other websites**

This Privacy Notice applies only to this website which contains links to other websites. If you access websites through these links you should read the privacy policies specific to those websites.

## **(viii) Changes to this Privacy Notice**

We keep this Privacy Notice under review and any updates will appear on our website.

We last updated this Privacy Notice on 24 July 2018.