

## WEBSITE PRIVACY NOTICE

Effective Date: March 30, 2021

Last Updated: June 18, 2021

Your privacy is very important to us. This notice (this "Privacy Notice") is provided by Capstone Investment Advisors, LLC on behalf of itself and its affiliates (collectively, "Capstone", "we" or "us"), and sets forth the policies of Capstone for the collection, use, storage, sharing, disclosure (collectively, "processing") and protection of personal data when you visit the website <https://www.capstoneco.com> or <https://www.globalvolatilitysummit.com> (collectively, our "Website").

This Notice applies to information we collect:

- On this Website.
- In email, text, and other electronic messages between you and this Website.
- Through registration and attendance at our conferences and events.

It does not apply to information collected by:

- Us offline or through any other means, including on any other website operated by any third party; or
- Any third party, including through any application or content that may link to or be accessible from or on the Website.

This Privacy Notice is being provided in accordance with the requirements of data privacy laws, including the EU General Data Protection Regulation 2016/679 (including the UK's retained version of Regulation EU 2016/679) ("GDPR"), the US Gramm-Leach-Bliley Act of 1999, as amended, the Data Protection Act (as amended) of the Cayman Islands ("DPA"), the California Consumer Privacy Act of 2018 ("CCPA"), or any other law relating to privacy or the processing of personal data and any statutory instrument, order, rule or regulation implemented thereunder, each as applicable to Capstone. European Economic Area, United Kingdom, and Cayman Islands natural persons should refer to our section on your rights under the GDPR and DPA below. California residents should refer to the separate notice on your California rights following this Privacy Notice. References to "you" in this Privacy Notice mean any natural person, or any natural person connected with an entity that is a legal person (each such natural person, a "data subject"), as applicable. For the purposes of Cayman Islands requirements, the applicable private fund managed by Capstone is the "data controller".

Please read this Privacy Notice carefully to understand our policies and practices regarding your information and how we will treat it. If you do not agree with our policies

and practices, your choice is not to use our Website. By accessing or using this Website, you agree to this Privacy Notice.

We reserve the right to modify or amend this Privacy Notice at our discretion at any time and without prior notice. When we make changes to this Privacy Notice, we will post the updated Privacy Notice on this Website and update the Effective Date. **Your continued use of our products and services following the posting of changes constitutes your acceptance of such changes.**

### **Children Under the Age of 16**

Our Website is not intended for children under 16 years of age. No one under age 16 may provide any information to or on the Website. We do not knowingly collect personal information from children under 16. If you are under 16, do not use or provide any information on this Website or provide any information about yourself to us, including your name, address, telephone number, email address, or any user name you may use. If we learn we have collected or received personal information from a child under 16 without verification of parental consent, we will delete that information. If you believe we might have any information from or about a child under 16, please contact us at [clientservice@capstoneco.com](mailto:clientservice@capstoneco.com), 212-232-1420 or by writing to the following address – Capstone Investment Advisors, LLC, 250 Greenwich Street, New York, New York 10007.

### **Information We Collect About You and How We Collect It**

We collect several types of information from and about users of our Website, including information:

- By which you may be personally identified, such as name, postal address, e-mail address, telephone number or other personal information or other identifier by which you may be contacted online or offline ("personal information");
- That is about you but individually does not identify you; and
- About your internet connection, the equipment you use to access our Website, and usage details.

We collect this information:

- Directly from you when you provide it to us.
- Automatically as you navigate through the site. Information collected automatically may include usage details, IP addresses, and information collected through cookies, web beacons, and other tracking technologies.
- From third parties, for example, our business partners and event sponsors.

### *Information You Provide to Us*

The information we collect on or through our Website may include:

- Information that you provide by filling in forms on our Website. This includes information provided at the time of registering to attend one of our conferences or events, engaging our services, posting material, or requesting further services. We may also ask you for additional information when you register and/or attend our conferences or events or when you report a problem with our Website.
- Records and copies of your correspondence including email addresses.

### *Information We Collect Through Automatic Data Collection Technologies*

As you navigate through and interact with our Website, we may use automatic data collection technologies to collect certain information about your equipment, browsing actions, and patterns, including:

- Details of your visits to our Website, including traffic data, location data, logs, and other communication data and the resources that you access and use on the Website.
- Information about your computer and internet connection, including your IP address, operating system, and browser type.

The technologies we use for this automatic data collection may include:

- Cookies (or browser cookies). A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our Website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our Website.
- Web Beacons. Pages of our the Website may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit us, for example, to count users who have visited those pages and for other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

### **How We Use Your Information**

We use information that we collect about you or that you provide to us, including any personal information:

- To present our Website and its contents to you.

- To provide you with information, products, or services that you request from us.
- To fulfill any other purpose for which you provide it.
- To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.
- To notify you about changes to our Website or any products or services we offer or provide through it.
- To organize, manage and conduct conferences and events and facilitate conference sponsorships.
- In any other way we may describe when you provide the information.
- For any other purpose with your consent.

We may use the information we have collected from you to enable us to engage conference and event sponsors and to share certain registrant and attendee information with conference and event sponsors.

#### **Disclosure of Your Information**

We may disclose aggregated information about you without restriction. We may disclose personal information that we collect or you provide as described in this Privacy Notice:

- To our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business and who are bound by contractual obligations to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Capstone's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by Capstone about our Website users is among the assets transferred.
- To our conference and event sponsors if you have registered or attended a Capstone or Capstone affiliated conference or event and you have not opted out of these disclosures. We contractually require these third parties to keep personal information confidential and use it only for the purposes for which we disclose it to them.
- To fulfill the purpose for which you provide it.
- For any other purpose disclosed by us when you provide the information.
- With your consent.

We may also disclose your personal information:

- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply our terms of use and other agreements, including for billing and collection purposes.
- If we believe disclosure is necessary or appropriate to protect the rights, property, or safety of Capstone, our clients, or others.
- To the extent permitted by applicable law, we reserve the right to disclose nonpublic, personal information about our customers and former customers to our affiliates in order to provide our customers with access to product offerings and product upgrades, and in order for our affiliates to provide services to us and our customers, such as investment advisory services and transaction processing.
- We reserve the right to disclose nonpublic, personal information about our customers and former customers to non-affiliated third parties with whom we have contracted to perform services on our behalf, such as accounting, legal, marketing, administrators and data processing services. We may disclose all of the information that we collect, as described above.

#### **Choices About How We Use and Disclose Your Information**

- *Tracking Technologies and Advertising.* You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site may then be inaccessible or not function properly.
- *Conference and Events Sponsors.* If you do not wish to have your email address and contact information used by the Company to promote our conferences and events and share with our conference and events sponsors, you can opt-out by sending us an email stating your request. If we have sent you a promotional email, you may send us a return email asking to be omitted from future email distributions.
- California residents may have additional personal information rights and choices.

#### **Accessing and Correcting Your Information**

You may also send us an email to request access to, correct or delete any personal information that you have provided to us. We may not accommodate a request to change information if we believe the change would violate any law or legal requirement or cause the information to be incorrect.

#### **Your California Privacy Rights**

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. California law requires us to provide you with some additional information regarding how we collect, use, and share your “personal information” (as defined in the CCPA). Please note the CCPA’s scope excludes personal information covered by certain financial services-specific privacy laws, including the Gramm-Leach-Bliley Act (GLBA) and California Financial Information Privacy Act (FIPA). Our separate Privacy Notice that is provided to investors applies to this excluded data and has been provided to our fund investors.

Depending on how you interact with our Website and services, we may collect the following categories of information from you, in addition to the information we collect in connection with providing financial products and services:

- Identifiers (such as your name and contact information, IP address, and mobile device identifiers);
  - We share identifiers with service providers, which may include Google Analytics.
  - Our business and commercial purposes for collecting and sharing this information are to operate our Website, to communicate with you, and for legal and everyday business purposes.
- Internet usage information (such as browsing history and use and interaction with our Website).
  - We share internet usage information with service providers, which may include Google Analytics.
  - Our business and commercial purposes for collecting and sharing this information are to operate our Website, to communicate with you, and for legal and everyday business purposes.
- This information is used and disclosed for the various business purposes and to the categories of third parties described in the “**How We Use Your Information**” section of the Privacy Notice, above.

If you are a California resident, you may have certain rights. California law may permit you to request that we:

- Provide you with the categories of personal information we have collected or disclosed about you in the last twelve months; the categories of sources of such information; the business or commercial purpose for collecting or selling your personal information; and the categories of third parties with whom we shared personal information.

- Provide you with access to and/or a copy of certain personal information we hold about you.
- Delete certain personal information we have about you.
- You may have the right to receive information about the financial incentives that we offer to you for your personal information (if any). You also have the right not to be discriminated against (as provided for in applicable law) for exercising your rights. Please note that certain information may be exempt from such requests under California law. For example, we may need certain information to provide services to you or for compliance with applicable law. If you ask us to delete certain information, you may no longer be able to access or use some of our services.

*Shine the Light Disclosure:* The California "Shine the Light" law gives residents of California the right under certain circumstances to request information from us regarding the manner in which we share certain categories of personal information (as defined in the Shine the Light law) with third parties for their direct marketing purposes. We do not share your personal information with third parties for their own direct marketing purposes.

If you would like further information regarding your legal rights under California law or would like to exercise any of them, please send us an email at the contact information provided below. You will need to provide additional information to verify your identity before we fulfill your request. You can also designate an authorized agent to make a request on your behalf. To do so, you must provide us with written authorization or power of attorney, signed by you, for the agent to act on your behalf. You will still need to verify your identity directly with us.

Please note that the CCPA sets forth certain obligations for businesses that "sell" personal information to third parties, and gives California residents the right to opt out of the "sale" of personal information. We do not engage in such activity and have not engaged in such activity in the past twelve months, nor do we have actual knowledge that we have engaged in such activity in connection with individuals under 16 years of age. We do share certain information and allow parties to collect certain information about your activity, for example through cookies. We explain our use of cookies and how you can control cookies in this Privacy Notice.

### **Data Security**

- We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

- The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of our Website, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.
- Unfortunately, the transmission of information via the internet is not completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

### **Contact Information**

To ask questions or comment about this Privacy Notice and our privacy practices, contact us at:

- clientservice@capstoneco.com,
- 212-232-1420
- or by writing to the following address – Capstone Investment Advisors, LLC, 250 Greenwich Street, New York, New York 10007.

### **FOR EUROPEAN ECONOMIC AREA, UNITED KINGDOM AND CAYMAN ISLANDS NATURAL PERSONS:**

#### **Introduction**

The below summarizes our policies with respect to personal information that we process of data subjects under the GDPR and DPA (together, "Data Protection Law") who are European Economic Area ("EEA"), United Kingdom ("UK") and Cayman Islands natural persons. This section sets out the kinds of personal information we collect and how that personal information is used.

#### **The types of personal data we may collect and use**

The categories of personal data we may collect include names, residential addresses or other contact details, signature, nationality, tax identification number, date of birth, place of birth, photographs, copies of identification documents, bank account details, information about assets or net worth, credit history, source of funds details or other sensitive information, such as certain special categories of data contained in the relevant materials or documents.



### **How we collect personal data**

We may collect personal data about you through: (i) information provided directly to us by you, or another person on your behalf; (ii) information that we obtain in relation to any transactions between you and us; and (iii) recording and monitoring of telephone conversations and electronic communications with you.

We also may receive your personal information from third parties or other sources, such as our affiliates, our conference and events sponsors, publicly accessible databases or registers, tax authorities, governmental agencies and supervisory authorities, credit agencies, fraud prevention and detection agencies, or other publicly accessible sources, such as the Internet.

### **Using your personal data: the legal basis and purposes**

We may process your personal data for the purposes of administering the relationship between you and us (including communications and reporting), direct marketing of our products, conferences, events, and services, monitoring and analysing our activities, and complying with applicable legal or regulatory requirements (including anti-money laundering, fraud prevention, tax reporting, sanctions compliance, or responding to requests for information from supervisory authorities with competent jurisdiction over our business). Your personal data will be processed in accordance with Data Protection Law and may be processed with your consent, upon your instruction, or for any of the purposes set out herein, including where we or a third-party consider there to be any other lawful purpose to do so.

Where personal data is required to satisfy a statutory obligation (including compliance with applicable anti-money laundering or sanctions requirements) or a contractual requirement, failure to provide such information may result in your subscription in the applicable fund being rejected or compulsorily redeemed or withdrawn, as applicable. Where there is suspicion of unlawful activity, failure to provide personal data may result in the submission of a report to the relevant law enforcement agency or supervisory authority.

### **How we may share your personal data**

We may disclose information about you to our affiliates or third parties for our everyday business purposes, such as to facilitate transactions, maintain your account(s) or respond to court orders and legal investigations. It may also be necessary, under anti-money laundering and similar laws, to disclose information about the relevant private fund's investors in order to accept subscriptions from them or to facilitate the establishment of

trading relationships for the relevant fund with executing brokers or other trading counterparties. We will also release information about you if you direct us to do so.

We may share your information with our affiliates for direct marketing purposes, such as offers of products, conferences, events, and services to you by us or our affiliates. You may prevent this type of sharing by contacting us as described below (see “Who to contact about this Privacy Notice”). We may also disclose information about your transactions and experiences with us to our affiliates for their everyday business purposes. If you are a new investor, we can begin sharing your information 30 days from the date we sent this Privacy Notice. When you are no longer our investor, we may continue to share your information as described in this Privacy Notice.

### **Monitoring of communications**

We may record and monitor electronic communications with you for the purposes of ensuring compliance with our regulatory obligations.

### **Retention periods and security measures**

We will not retain personal data for longer than is necessary in relation to the purpose for which it is collected, subject to Data Protection Law. Personal data will be retained for the duration of your investment in the relevant fund, as applicable, and for a minimum period of five to seven years after a redemption or withdrawal, as applicable, of an investment or liquidation of a fund. We may retain personal data for a longer period for the purpose of marketing our products and services or compliance with applicable law. From time to time, we will review the purpose for which personal data has been collected and decide whether to retain it or to delete if it no longer serves any purpose to us.

To protect your personal information from unauthorised access and use, we apply organisational and technical security measures in accordance with Data Protection Law. These measures include computer safeguards and secured files and buildings. We will notify you of any material personal data breaches affecting you in accordance with the requirements of Data Protection Law.

### **International transfers**

Because of the international nature of a fund management business, personal data may be transferred to countries outside the EEA, UK, or the Cayman Islands (“Third Countries”), such as to jurisdictions where we conduct business or have a service provider, including countries that may not have the same level of data protection as that afforded by the Data Protection Law in the EEA, UK, or the Cayman Islands. In such cases, we will process personal data (or procure that it be processed) in the Third Countries in accordance with

the requirements of the Data Protection Law, which may include having appropriate contractual undertakings in legal agreements with service providers who process personal data on our behalf in such Third Countries.

### **Your rights under Data Protection Law**

Data Subjects in the EEA or UK and investors into the private funds managed by Capstone have certain rights under the applicable Data Protection Law in relation to our processing of their personal data and these are, generally: (i) the right to request access to your personal data; (ii) the right to request rectification of your personal data; (iii) the right to request erasure of your personal data (the "right to be forgotten"); (iv) the right to restrict our processing or use of personal data; (v) the right to object to our processing or use where we have considered this to be necessary for our legitimate interests (such as in the case of direct marketing activities); (vi) where relevant, the right to request the portability; (vii) where your consent to processing has been obtained, the right to withdraw your consent at any time; and (viii) the right to lodge a complaint with a supervisory authority. You should note that your right to be forgotten that applies in certain circumstances under GDPR is not likely to be available in respect of the personal data we hold, given the purpose for which we collect such data, as described above.

You may contact us at any time to limit our sharing of your personal information. If you limit sharing for an account you hold jointly with someone else, your choices will apply to everyone on your account. US state laws may give you additional rights to limit sharing.

### **Complaining to supervisory authorities**

A complaint in respect of Capstone may be made to the Information Commissioner's Office in the United Kingdom or the Ombudsman in the case of the Cayman Islands.

### **Who to contact about this Privacy Notice**

Please contact Investor Relations at [clientservice@capstoneco.com](mailto:clientservice@capstoneco.com), 212-232-1420 or by writing to the following address – Capstone Investment Advisors, LLC, 250 Greenwich Street, New York, New York 10007 - for any questions about this Privacy Notice or requests with regards to the personal data we hold.

For more specific information or requests in relation to the processing of personal data by any service provider, please contact Investor Relations at [clientservice@capstoneco.com](mailto:clientservice@capstoneco.com), 212-232-1420 or by writing to the following address – Capstone Investment Advisors, LLC, 250 Greenwich Street, New York, New York 10007.