

MACRO HEDGE – PRIVACY POLICY

We are Macro Hedge Advisors LLP ("Macro Hedge", "we", "us" and "our"). We are committed to protecting your privacy. In this Privacy Policy for <https://www.macrohedgeadvisors.com/> (the "Site") and any information/news service we provide (together, our "Service"), we explain who we are, why and how we collect, store and use (together, "process" or "processing") your personal information (also referred to as personal data), your rights and how to contact us.

Please read this policy carefully to understand our views and practices regarding your personal information and how we will treat it.

By engaging with our Service you acknowledge you have read and understood this privacy policy.

We are the data controller of the personal information processed in relation to this policy (except where this policy explains otherwise). This means we are responsible for treating your personal information safely, in accordance with applicable data protection and privacy laws. If you have any questions about how we protect your personal data, please [contact us](#).

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WHAT INFORMATION WE PROCESS

We will process the following types of personal information about you.

YOU PROVIDE US WITH

When you interact with us (for example, registering on our website, or sending us an e-mail), we collect the following types of personal information:

- **Contact details:** including first and last name, and e-mail address. You may optionally provide your organisation and phone number(s).
- **Account Data:** including your e-mail/username and password, and your subscription preferences.
- **Correspondence:** any correspondence you have with us including any queries you submit or feedback you provide to us (including any information you may provide in correspondence, such as your name & email, profession, industry and country/location).
- **Engagement:** We may post content on social media websites, such as LinkedIn. If you engage with this content,

we may see your profile information and any comments. We may also see aggregated engagement statistics; these do not contain any personal data.

- **Financial:** If you choose to use our premium service, we may ask you for the payment information required to process any fee(s) we charge you. (We will provide you with our invoicing and/or payee information).

It is important that the personal information we hold about you is accurate and current. If you would like to change your email address, you may cancel your current subscription and register for a new subscription.

OTHER PARTIES MAY PROVIDE US WITH

If you previously engaged with [Our People](#) (Dr. Brendan Brown and/or Stephen Martus, CFA) we may have continued our correspondence and/or relationship with you, and thus we have may additionally have the following data:

- **Context:** may include your name, contact, profession, industry and country/location.

We will inform you via this policy (or at the time) if and when we receive information about you from any third parties, and explain how and why we intend to use that information (including when combining it with data we already hold).

WE AUTOMATICALLY COLLECT

Technical information and information about your visit

- **Technical information** may include the Internet protocol (IP) address used to connect your computer to the Internet (including the IP's country), your login information, browser type and version, device ID, time zone setting, browser plug-in types and versions, operating system and platform;
- **Information about your visit** may include the full Uniform Resource Locators (URL), clickstream to, through and from our Service (including date and time), information you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our member service number or social media handle used to connect with us.

We do not currently use any cookies on our Service. If this changes, we will update the information we provide to you.

HOW AND WHY WE USE YOUR INFORMATION

We've set out how we use each category of personal information, and what legal basis (or bases) allows us to undertake the processing. We explain more about what each legal basis means [below](#).

We may process your personal data based one or more than one legal basis, depending on the specific purpose(s) for which we are using your personal information. Please [contact us](#) if you

would like further details about the specific legal basis we are relying on to process your personal data.

TYPE OF PERSONAL INFORMATION	HOW WE USE THIS PERSONAL INFORMATION	OUR LEGAL BASES FOR PROCESSING
<ul style="list-style-type: none"> Identity Account 	<ul style="list-style-type: none"> To register you as a new member who wants to receive the Services. You may use portions of our Service without registering. 	Consent Contract More info
<ul style="list-style-type: none"> Contact Account Context 	<ul style="list-style-type: none"> To promote our service to you and keep you updated with information about our services, including: <ul style="list-style-type: none"> delivering relevant content on topics we think may be of interest to you, including weekly updates, monthly Global Monetary Viewpoints, and ad hoc alerts, or other interest-based updates and communications; and letting you know about new functionalities or services. <p>See 'Our Promotional Updates and Communications' to learn more</p>	Consent Our legitimate interests More info
<ul style="list-style-type: none"> Contact Account Context 	<ul style="list-style-type: none"> To perform our contract(s) (including our Terms & Conditions with you, including <ul style="list-style-type: none"> providing our Site to you administering your account with us; storing your personal information; providing our Services to you; notifying you of any changes to our Service; and providing information to you which you have requested. 	Contract More info
<ul style="list-style-type: none"> Contact Account Engagement 	<ul style="list-style-type: none"> To manage our relationship with you which will include: <ul style="list-style-type: none"> notifying you about changes to our terms or privacy policy; and asking you to leave a review, provide feedback or take a survey. 	Contract Legal Obligation Our legitimate interests More info
<ul style="list-style-type: none"> Contact Account Financial 	<ul style="list-style-type: none"> Manage payments, fees and charges. Collect and recover money owed to us. 	Contract Our legitimate interests More info

<ul style="list-style-type: none"> • Contact • Automatically collected information 	<ul style="list-style-type: none"> • To administer our Service and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes. • To improve our Service to ensure that content is presented in the most effective manner for you and for your computer. • To keep our Service safe and secure. 	<p>Our legitimate interests</p> <p>More info</p>
<ul style="list-style-type: none"> • Identity • Account • Engagement • Context 	<p>We may anonymise and/or aggregate Identity, Account and/or Context information, and we may use aggregated information (such as common financial query topics) to provide a more bespoke service, help us develop new products and improve our services.</p>	<p>Our legitimate interests</p> <p>More info</p>

Our promotional updates and communications

With your prior consent (or where permitted in our **legitimate interest**), we will use your personal information for marketing analysis and to provide you with promotional update communications by email about our services.

You can opt-out of further marketing at any time by selecting the "unsubscribe" link at the end of all our marketing and promotional update communications to you, or by sending us an email at mha@macrohedgeadvisors.com.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you would like an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at mha@macrohedgeadvisors.com. If we process your personal data for any new purpose, we will notify you (via updating this Privacy Policy, and letting you know we have updated it) and we will explain the legal basis which allows us to do so.

Legal bases explained

Consent: We will only process your personal information for promotional or marketing purposes where you have given us your express consent for us to do this, where required by law. For more information, please refer to [Our Promotional Updates and Communication section](#).

You can opt-out of further marketing at any time by selecting the "unsubscribe" link at the end of all our marketing and promotional update communications to you, or by sending us an email at mha@macrohedgeadvisors.com.

Contract: We collect, store and process your personal information where it is necessary for performing a contract you have with us (such as our [Terms & Conditions](#)), or where you have asked us to take specific steps before entering into that contract.

Legal Obligation: We may need to process your personal information to comply with applicable legal obligations and statutory obligations and regulatory rules and guidance, including under applicable UK, EU and local law (including data protection law), and/or any court orders.

Legitimate interests: processing your personal information is sometimes necessary for us to do the following activities, in our own interest or sometimes in the interests of a third party.

Our legitimate interests are:

- Enforcing or applying our [Terms & Conditions](#) or other agreements with you, including recovering fees or other debt due to us.
- Gaining insights on how you use our Site and Service.
- Delivering, developing and improving our Site and Service, including the effectiveness of our scoring methodology.
- Enabling us to enhance, customise or modify our Site, Service and communications.
- Growing our business and informing our marketing strategy.
- Keeping our records updated and studying how individuals use our products/services.
- Improving our Service and data security.
- Providing you with our promotional updates and communications (see [Our Promotional Updates and Communication section](#)), only in certain cases where you have purchased a service from us and have not opted-out at the time of purchase or any time since (you are free to opt-out at any time!).

In each case, these legitimate interests are only valid if they are not outweighed by your rights and interests. If you would like further information about how we assess our legitimate interests, please contact us at mha@macrohedgeadvisors.com.

WHO WE SHARE YOUR PERSONAL INFORMATION WITH

We may share your personal information with:

- **Our staff**, as part of their role at Macro Hedge, only to the extent that they need access to your personal information for the reasons set out in this policy.
- **Any future member of the Macro Hedge group**, which means our subsidiaries, our ultimate holding company and its subsidiaries, who support our processing of personal information under this policy. If any of these parties are using your information for direct marketing purposes, we will only transfer the information to them for that purpose with your prior consent.
- **Appropriate third parties** including
 - our **business partners, suppliers or sub-contractors** which support the performance of any contract we enter into or other dealings we have in the normal course of business with you;
 - Our **service providers**, who process your personal data on our behalf and in accordance with our instructions and the data protection law. This includes: (i) technology providers who support the services we offer to you, for example, by hosting websites, storing data, or providing IT support services; and (ii) companies that help us distribute any communications we send, update marketing lists, facilitate feedback on our services and/or the electronic signing of documents. These organisations (which may include third party suppliers, agents, sub-contractors and/or other companies in our group) will only use

your information to the extent necessary to perform their support functions.

- our **regulators**, in the event we need to comply with our applicable legal obligations;
- **analytics and search engine providers** that assist us in the improvement and optimisation of our Service;
- our auditors, legal advisors and other professional advisors; and
- anyone who you give us your prior explicit permission to share it with.

Other disclosures we may make

We will disclose your personal information to third parties if we buy or sell part of our (or another) business, or if we are required to do so in order to comply with a legal obligation.

In more detail:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal information to the prospective seller or buyer of such business or assets subject to the terms of this policy.
- If Macro Hedge or substantially all of its assets are acquired by a third party, in which case personal information held by it about its clients will be one of the transferred assets.
- If we are under a duty to disclose or share your personal information in order to comply with any legal obligation, or in order to enforce or apply our terms of service or other agreements with you; or to protect the rights, property, or safety of Macro Hedge, our clients, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction and to prevent cybercrime.

YOUR RIGHTS

Under data protection law, you have a number of rights in respect of your personal information that we process.

You have the right, under certain circumstances:

- to be **provided with a copy** of your personal information held by us;
- to request the **correction or deletion** of your personal information held by us;
- to request that we **restrict** the processing of your personal information (while we verify or investigate your concerns with this information, for example);
- to **object** to the further processing of your personal information, including the [right to object to marketing](#); and
- to request that your provided personal information **be moved** to a third party.

How to exercise your rights

If you have any questions or concerns about we handle your personal data or wish to exercise any of your legal rights you can contact us by writing to us at mha@macrohedgeadvisors.com. In particular, where the processing of your personal information by us is based on consent, you have the right to withdraw that consent without detriment at any time.

The Information Commissioner's Office (ICO) is the supervisory authority in the UK for data protection issues and can provide further information about your rights and our obligations in relation to your personal information, as well as deal with any complaints that you have about our processing of your personal information (please visit their website at www.ico.org.uk). You may also approach your local data protection authority (see [European Commission: Data Protection - Data Protection Authorities](#)). We would, however, appreciate the chance to deal with your concerns before you approach a supervisory authority so please contact us by writing to us at mha@macrohedgeadvisors.com in the first instance.

WHERE WE STORE YOUR INFORMATION & INTERNATIONAL TRANSFERS

Macro Hedge is based in the UK. We may transfer your personal information to one or more countries outside the UK (including to the EEA), where or our Service providers maintain operations. We will take steps to ensure that your data is held safely in such circumstances.

The servers used to process your personal information collected from this website are located in the United Kingdom, but we collect data from wherever users are situated. The information that we collect may therefore be transferred to the United Kingdom from any other country in which you may be located.

Why do we transfer it?

We may transfer your personal information outside the EEA

- in order to **store** it
- in order to enable us to **provide our Platform** to you and fulfil our contract with you
- where we are **legally required** to do so
- in order to **facilitate the operation of our group of businesses**, where it is in our legitimate interests and we have concluded these are not overridden by your rights.

Company	Country	Transfer safeguard
The Rocket Science Group LLC d/b/a MailChimp	United States	Privacy Shield
A Handful of Colour	UK	UK adequacy regulations (as applicable)

HOW WE PROTECT YOUR INFORMATION

Unfortunately, the transmission of information via the internet is not completely secure. We do our best to protect your personal information, but we cannot guarantee the security of your data transmitted to our Service; any transmission is at your own risk. Once we have received your information, we use strict procedures and security features to try to prevent unauthorised access.

We recommend using a strong, unique password for your Macro Hedge account and making sure you keep your password confidential.

EXTERNAL SITES

Our Service may, from time to time, contain links to external sites. If you follow a link to any of these websites, please note that these websites have their own privacy policies. Macro Hedge does not accept any responsibility or liability for these policies or any content on external sites and does not necessarily endorse the views expressed within them. Macro Hedge has no control over the availability of any of these websites. Please check each site's policies before you submit any personal information to these websites.

HOW LONG WE KEEP YOUR INFORMATION

Where you have an account with us, we will hold your personal information for so long as you use our Service and/or have your account with us in order to meet our contractual obligations to you, and for 6 years after that to identify any issues and resolve any legal proceedings. (We may retain your personal data for a longer period in the event of a complaint, if we reasonably believe there is a prospect of legal proceedings in respect of our relationship with you, or we are aware of pending or ongoing legal proceedings with you.)

In some circumstances, we may keep data longer if applicable law says we have to.

We otherwise process personal information only for so long as is necessary for the purpose(s) for which it was originally collected, after which it will be deleted or archived.

CHANGES TO THIS POLICY

This policy was last updated on *29 May 2020*.

Any changes we make to this policy in the future will be posted on this page. If we make any substantive changes, we will notify you by e-mail or through in-App messaging, website pop-ups or in-App notifications within this page or the Service.

CONTACT US

We welcome your feedback and questions. We can be contacted as follows:

Email: mha@macrohedgeadvisors.com.

Telephone: +44 (0)203 995 448

Mail: 100 Pall Mall, London SW1Y 5NQ

Or simply send a message on our [Contact Us](#) page.