

## Privacy Notice

Fat Gladiator Limited is committed to protecting the privacy and security of the personal data of our website visitors, prospective members, members, presenters, suppliers, job applicants and Gladiator Training Programme trainees we deal with in the course of our business operations and the provision of our services. This Privacy Notice explains who we are, how we collect, share, and use your personal data, and how you can exercise your data protection rights.

### We ensure that your personal data:

- ➔ Is processed lawfully, fairly and in a transparent manner.
- ➔ Is collected only for specified, explicit and legitimate purposes.
- ➔ Is adequate, relevant, and limited to what is necessary in relation to the services that we are providing you.
- ➔ Is accurate and where necessary, kept up to date.
- ➔ Is not kept in a form which allows for you to be identified for longer than is necessary.
- ➔ Is only processed in a manner that ensures its security using appropriate technical and organisational measures to protect it against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

### Our name and contact details

Fat Gladiator Limited (UK company registration 12969075), NT Accountancy, Chartered Accountants, 43 Lynton Mead, London, N20 8DG and our data protection manager's email address is [privacy@fatgladiator.com](mailto:privacy@fatgladiator.com).

Fat Gladiator is a wholly owned subsidiary of Curation Corporation Limited (UK company registration 07864348).

### What we do

The Fat Gladiator is a unique and exclusive investment club that tracks the world's most powerful trends and identifies the companies and asset classes most likely to profit from them.

### Processing your personal data

We process and manage your personal data according to the relationship we have with you. This relationship helps us to identify the appropriate data subject category you belong to (or group of individuals whose data we process in an identical manner) and allows us to provide you the details of how we process your personal data. We interact with you in one or more of the following ways:

<b>As a <i>website visitor</i></b>	
<p>We collect, store, and use your personal data to make our website more intuitive and easier to use, and to protect the security and effective functioning of our website and to respond to general inquiries you make on the website. This processing is done on the basis of our legitimate interests.</p> <p>It is necessary for our legitimate interests to monitor how our website is used to help us (a) improve the layout and information available on our website and provide a better service to our website users and (b) detect and prevent fraud, other crimes, and the misuse of our website and (c) to respond to your requests for information.</p>	
We collect	IP address, device used and website analytics.
From	Directly from yourself through the website and from our website analytics providers.
Share with	Third parties who provide us the following services: technology and website support. Only aggregated data is retained by our website analytics provider.
Store in	UK, EEA and USA.
Retain for	Your personal data is retained for the period of your website visit or for the terms of the cookies you agree to.
Safeguards	<p>Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:</p> <ul style="list-style-type: none"> <li>• We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data</li> <li>• Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.</li> </ul> <p>We have put in place security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed.</p> <p>We limit access to your personal information to authorised employees or contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.</p> <p>Details of these measures may be obtained from <a href="mailto:privacy@fatgladiator.com">privacy@fatgladiator.com</a>.</p>

<b>As a <i>prospective member (via the website)</i></b>
<p>In addition to being a <i>website visitor</i>, we also collect, store, and use your personal data to respond to general and membership inquiries on the basis of contract, legitimate interest, and legal obligation.</p> <p>We need to process your personal information to manage your Fat Gladiator membership contract we are about to enter with you. If you fail to provide certain information when requested, we may not be able to perform the contract we are about to enter with you.</p> <p>It is in our legitimate interest to communicate with you regarding our services and products that we believe you may have an interest in.</p> <p>We process your personal data under legal obligation as an Appointed Representative of Messels Limited which is regulated by the Financial Conduct Authority to ensure that our regulatory obligations are fulfilled and that we can provide information to the relevant authorities if and when required to do so.</p>

We collect	Name, mobile number, address, email address, payment data, call attendance, appropriate investor information as required by the FCA.
From	Directly from yourself through the website.
Share with	Third parties who provide us the following services: technology support, website analytics and payment service.
Store in	UK, EEA and USA.
Retain for	If you become a member, your personal data is retained for the period of your membership with us plus 6 years and if you do not become a member, we retain your personal data for 180 days or until you ask us to delete, whichever happens first.
Safeguards	<p>Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:</p> <ul style="list-style-type: none"> <li>• We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data</li> <li>• Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.</li> </ul> <p>We have put in place security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed.</p> <p>We limit access to your personal information to authorised employees or contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.</p> <p>Details of these measures may be obtained from <a href="mailto:privacy@fatgladiator.com">privacy@fatgladiator.com</a>.</p>

**As a *prospective member (indirectly)***

We collect, store, and use your personal data to send you information about our services, invitations to events and other communications which we think you may be interested in on the basis of contract, our legitimate interest, and legal obligation.

We need to process your personal information to manage your Fat Gladiator membership contract we are about to or have entered into with you. If you fail to provide certain information when requested, we may not be able to perform the contract we are about to or have entered into with you.

It is in our legitimate interest to communicate with you regarding our services and products that we believe you may have an interest in.

We process your personal data under legal obligation as an Appointed Representative of Messels Limited which is regulated by the Financial Conduct Authority to ensure that our regulatory obligations are fulfilled and that we can provide information to the relevant authorities if and when required to do so.

We collect	Name, email address, country, and if applicable, company name.
From	Indirectly from people who may recommend you.
Share with	Third parties who provide us the following services: technology support, client relationship management.

Store in	UK, EEA and USA.
Retain for	If you become a member, your personal data is retained for the period of your membership with us plus 6 years and if you do not become a member, we retain your personal data for 180 days or until you ask us to delete, whichever happens first.
Safeguards	<p>Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:</p> <ul style="list-style-type: none"> <li>• We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data</li> <li>• Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.</li> </ul> <p>We have put in place security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed.</p> <p>We limit access to your personal information to authorised employees or contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.</p> <p>Details of these measures may be obtained from <a href="mailto:privacy@fatgladiator.com">privacy@fatgladiator.com</a>.</p>

<b>As a <i>member</i></b>	
<p>We collect, store, and use your personal data to register and support your Fat Gladiator member services and to take payment on the basis of contract, our legitimate interest, and legal obligation.</p> <p>We need to process your personal information to manage your Fat Gladiator membership contract we are about to or have entered into with you. If you fail to provide certain information when requested, we may not be able to perform the contract for Fat Gladiator services we have entered into with you.</p> <p>It is in our legitimate interest to collect your payment data in order for us to bill you for your Fat Gladiator membership and to collect your contact data to provide you our email newsletter updates, and provide invitations to, registration for and attendance at our hosted presentations.</p> <p>We process your personal data under legal obligation as an Appointed Representative of Messels Limited which is regulated by the Financial Conduct Authority to ensure that our regulatory obligations are fulfilled and that we can provide information to the relevant authorities if and when required to do so.</p>	
We collect	Name, email address, payment details and appropriate information as required by the FCA.
From	Directly from yourself.
Share with	Third parties who provide us with the following services: technology and website support, payment service and where it is necessary to administer the Gladiator member service.
Store in	UK, EEA, New Zealand and USA.
Retain for	The period of your contract plus 6 years.

Safeguards	<p>Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:</p> <ul style="list-style-type: none"> <li>• We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data</li> <li>• Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.</li> </ul> <p>We have put in place security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed.</p> <p>We limit access to your personal information to authorised employees or contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.</p> <p>Details of these measures may be obtained from <a href="mailto:privacy@fatgladiator.com">privacy@fatgladiator.com</a>.</p>
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<b>As a <i>presenter</i></b>	
<p>We collect, store, and use your personal data when you deliver a presentation to our members on the basis of our legitimate interest and contract.</p> <p>It is in our legitimate interest for us to record our club calls so that our members can view the calls at any time and for use in marketing assets.</p> <p>If you fail to provide certain information when requested, we may not be able to perform the contract we are about to, or have entered into with you, or we may be prevented from complying with our legal obligations.</p>	
We collect	Name, email address, mobile number, company information.
From	Directly from yourself or a Fat Gladiator member that has recommended you.
Share with	Fat Gladiator members Third parties who provide us the following services: technology support and business support.
Store in	UK and EEA.
Retain for	The period of 6 years.
Safeguards	<p>Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:</p> <ul style="list-style-type: none"> <li>• We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data</li> <li>• Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.</li> </ul> <p>We have put in place security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed.</p> <p>We limit access to your personal information to authorised employees or contractors and other third parties who have a business need-to-know. They will</p>

	<p>only process your personal information on our instructions, and they are subject to a duty of confidentiality.</p> <p>Details of these measures may be obtained from <a href="mailto:privacy@fatgladiator.com">privacy@fatgladiator.com</a>.</p>
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<b>As a <i>supplier</i></b>	
<p>We collect, store, and use your personal data when you provide us goods or services on the basis of contract and legal obligation.</p> <p>If you fail to provide certain information when requested, we may not be able to perform the contract we are about to, or have entered into with you, or we may be prevented from complying with our legal obligations.</p> <p>We need to collect your contact and payment details in order for us to pay you, to prevent fraud, to make decisions about the continued provision of goods and/or services by you, and to make arrangements for the termination of the provision of goods and/or services by you.</p>	
<b>We collect</b>	Name, email address, mobile number, physical address, payment details, tax information and Company information
<b>From</b>	Directly from yourself through the contract negotiation and setup process.
<b>Share with</b>	Third parties who provide us the following services: technology support, accounting, and finance.
<b>Store in</b>	UK, EEA, USA and New Zealand.
<b>Retain for</b>	The period of our contract with you plus 6 years.
<b>Safeguards</b>	<p>Whenever we transfer your personal data out of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:</p> <ul style="list-style-type: none"> <li>• We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data</li> <li>• Where we use certain service providers, we may use specific contracts approved for use in the UK which give personal data the same protection it has in the UK.</li> </ul> <p>We have put in place security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed.</p> <p>We limit access to your personal information to authorised employees or contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.</p> <p>Details of these measures may be obtained from <a href="mailto:privacy@fatgladiator.com">privacy@fatgladiator.com</a>.</p>

<b>As a <i>job applicant</i></b>	
<p>We collect, store, and use your personal data to assess your skills, qualifications, and suitability for the work or role, during this process on the basis of our legitimate interest and contract.</p> <p>It is in our legitimate interest to carry out background checks, communicate with you about the recruitment process and keep records related to our hiring process.</p>	

If you fail to provide information when requested, which is necessary for us to consider your job application, we will not be able to process your application.

We collect	Name, email address, CV, interview notes, references, qualifications, skills, employment history and entitlement to work in the UK. We may also collect health data, for example if the applicant needs reasonable adjustments to be made for an interview or for their role, if accepted.
From	Directly from yourself, however, we may sometimes collect additional information about you from third parties including recruitment agencies, social media, former employers and referees.
Share with	Recruitment agencies, referees or other background check agencies.
Store in	UK and EEA.
Retain for	One year after we have communicated to you our decision about whether to appoint you. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way.
Safeguards	We have put in place security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We limit access to your personal information to authorised employees or contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality. Details of these measures may be obtained from <a href="mailto:privacy@fatgladiator.com">privacy@fatgladiator.com</a>

**As a *trainee***

We collect, store, and use your personal data to assess your skills, qualifications, and suitability as a trainee, during this process on the basis of contract and our legitimate interest.

We process your personal information to decide whether to enter into a contract for services with you. If you fail to provide information when requested, which is necessary for us to consider your application to our trainee programme, we will not be able to process your application.

It is in our legitimate interest to communicate with you and keep records related to our trainee programme review and acceptance process.

We collect	Name, email address, CV.
From	Directly from yourself.
Share with	Our technology support, CRM provider where it is necessary to administer the trainee programme and charities and non-governmental organisations if you heard about us from them.
Store in	UK, the EEA and the USA.
Retain for	Your personal data is retained the period of your trainee programme membership with us plus 6 years. If your trainee programme application is unsuccessful, we retain your personal data for a year after we have communicated to you our decision about whether to accept you as a trainee. In this case we retain your personal information for

	that period so that we can show, in the event of a legal claim, that we have not discriminated against trainee candidates on prohibited grounds and that we have conducted the trainee review and acceptance process in a fair and transparent way.
Safeguards	<p>We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.</p> <p>We limit access to your personal information to authorised employees or contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.</p> <p>Details of these measures may be obtained from <a href="mailto:privacy@fatgladiator.com">privacy@fatgladiator.com</a>.</p>

### Your data

May, in certain circumstances, be provided to other third parties such as HMRC or Companies House, or other regulatory or law enforcement bodies, technology companies that provide us with cloud-based solutions, professional advisers (as we engage with law firms, banks, accountants etc.) but only in compliance with the law and where strictly necessary.

### Automated decision-making and profiling

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, including profiling, unless you have given us your consent to do so, or it is necessary for entering into or the performance of a contract.

### Your rights

- [Access](#) – you have the right to ask us for information on the personal data that we store and copies of examples of the personal data. This right always applies. There are some exemptions, which means you may not always receive all of the information and examples of copies of your personal data.
- [Rectification](#) - you have the right to ask us to rectify any of your personal data that you think is inaccurate or incomplete. This right always applies.
- [Erasure](#) - you have the right to ask us to erase your personal data where it is no longer required for purpose for which it was collected, or you withdraw your prior consent to us processing it and we have no other legal ground for processing it, or it is being processed unlawfully, or when it must be erased to comply with a legal obligation, or it is being used for direct marketing purposes where we have no legitimate grounds for us doing so.
- [Restriction](#) - you have the right to ask us to restrict the processing of your personal data where it is inaccurate (allowing us to verify the accuracy), or it is being processed unlawfully (and you want us to stop processing rather than erasing it), or where you have objected to us processing it while we're verifying whether we have legitimate grounds for processing, or it is no longer required for



purpose for which it was collected and you want us to keep it for the establishment, exercise or defence of legal claims.

- [Portability](#) - this only applies to personal data you have given us. You have the right to ask us to transfer the information you provided us from one organisation to another or give it to you. This only applies if we are processing personal data based on your consent or as part of a contract, or in talks with you about entering into a contract and the processing is automated.
- [Objection](#) - you have the right to object to processing your personal data if we are using legitimate interests as our lawful basis for processing, or it is being used for direct marketing.
- [Withdrawing consent](#) – you can withdraw your consent that you have previously given to us for one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent. It may mean we are not able to provide certain products or services to you and we will advise you if this is the case.
- You have the right to complain to a Supervisory Authority, in the UK that is the [Information Commissioner's Office](#).

## **Breaches**

We have put 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 required to do so.

## **Dealing with your data subject requests**

We will deal with your data subject requests as soon as possible but may take up to 1 month (possibly extended to 3 months where the law permits). Normally there is no charge, however we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive or we could refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that your personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **Note**

This notice does not form part of any contract of employment or other contract to provide services.

## **Updates**

We may update this privacy notice from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements. Any changes to this privacy notice will be posted on this page and, where appropriate, notified to you by email (if you have

registered your e-mail details with us) when we are required to do so by applicable law. We recommend that you review this privacy notice regularly for changes.

### **How to make a complaint**

Data privacy laws are constantly evolving, and we endeavour to maintain best practices. However, if you believe that we have not got something right and you wish to discuss our processes, we would be happy to hear from you on [privacy@fatgladiator.com](mailto:privacy@fatgladiator.com) in the first instance. If you are still unhappy, you should know that you have the right to contact the Information Commissioner's Office, which is our data protection supervisory authority, by clicking here: <https://ico.org.uk/make-a-complaint/>.

## **Supplementary information**

### **Direct marketing**

Our direct marketing activities comply with the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2003/2426) which means that you may receive direct marketing communications from us if you have requested these, or you have purchased any of our services and have not opted-out from receiving these, or the communications are necessary for performing a contract between us.

### **Security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used, altered, disclosed, destroyed, or accessed without authorisation. While no data transmission or storage can be guaranteed to be secure, we implement a range of commercially reasonable physical, technical, and procedural measures to help protect personal data. These measures include confidentiality agreements with third parties, secure development practices, security due diligence of service providers, products, services that may be used and ISO27001-based organisational security policies.

We have also put in place procedures to deal with any suspected personal data breaches and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Cookies**

Cookies are small files we store on the device (computer, mobile phone, tablet, or any other mobile device) that you use to access our website or portal - this is so we can recognize repeat users improve your experience while you navigate through the website.

We use the term 'cookies' to include not only cookies, but also other technologies such as pixels, web beacons and page tags. Our website uses 'first-party' cookies (which are set by our own website) and 'third-party' cookies (which are set by websites other than our own).

Telling you about and managing how we use cookies is required by the Privacy and Electronic Communications (EC Directive) Regulations 2003 (SI 2003/2426).

## What cookies do we use?

We use the following types of cookie:

### ☞ Necessary

These are essential for our website to function properly. This category only includes cookies that ensures basic functionalities and security features of the website. These cookies do not store any personal information.

### ☞ Non-necessary

These may not be necessary for the website to function and are used to collect user personal data via analytics, ads, other embedded content and help us analyse and understand how you use our website. We always ask for your consent before using this type of cookie.

## Blocking cookies

You can also disable cookies by changing settings on your browser that allows you to refuse the setting of all or some cookies. The settings and steps for managing cookies vary by browser, so we suggest referring to your browser's documentation.

If you use your browser settings to block all cookies (including 'Necessary' cookies) you may not be able to access all or parts of our website.

## Requesting more details about the cookies we use

For a detailed list of cookies we use including information about type of cookie, expiry periods and links to third party sites please contact [privacy@fatgladiator.com](mailto:privacy@fatgladiator.com) or click on this link [www.fatgladiator.com/cookie-notice](http://www.fatgladiator.com/cookie-notice)