



Privacy Policy

Last Updated: September 21, 2022

Vola Dynamics LLC is in the business of providing fast and robust options analytics. As part of onboarding new clients and servicing our existing clients, we generally collect minimal data on the individuals with whom we are doing business. Although we never sell this identifying data, we are subject to data privacy protection regulations and thus have created this Privacy Policy to explain (i) our practices relating to the collection, use and disclosure of your personal information and (ii) your privacy rights under the European Union General Data Protection Regulation (“GDPR”). GDPR governs the collection of an EU-resident individual’s “personal information”, which is essentially any information that can be used to identify a specific individual. This Privacy Policy relates primarily to personal information and does not govern our collection and use of other data (e.g., usage statistics, other analytics), details of which can be found in the applicable legal agreement.

Vola takes your personal privacy seriously. We only collect personal information for legitimate reasons and in a transparent manner, and to only use such information for appropriate and clearly stated purposes. If at any point you have concerns about our data collection and usage practices, please do not hesitate to contact us via any of the methods listed at the end of this document.

Collection of personal information

For current and prospective customers, we collect some (or potentially all) of the following types of personal information:

- First and last name
- Email address
- IP address
- Phone number
- Mailing address

How we use your personal data

Vola uses your personal information for the following reasons:

- To provide and maintain our service
- To ensure we know the identity of our customers
- For the performance of a contract
- To comply with legal obligations
- To contact you

Legal basis for processing personal information under GDPR

GDPR allows for specific circumstances in which we are allowed to collect and process your personal information, and we have listed below those that are potentially applicable to the collection of your information. Please contact us if you would like to know which basis applies in your case.

- **Consent.** You have given consent for processing personal information for one or more specific purposes.
- **Performance of a contract.** Provision of personal information is necessary for the performance of an agreement with you (or your employer) and/or for any related pre-contractual obligations.
- **Legal obligations.** Processing personal information is necessary for compliance with a legal obligation to which we are subject.
- **Legitimate interests.** Processing personal information is necessary for the purposes of pursuing our legitimate interests.

Data retention

We store your personal information only for so long as is necessary for the purposes set out in this Privacy Policy, or longer where required to comply with applicable legal obligations, resolve disputes, or enforce our legal agreements.

Third party disclosure

Vola may engage third parties to facilitate certain business functions such as marketing, operations, and recordkeeping. Vola will share your personal information with such third parties if it is necessary to perform the relevant functions, but only if there is a data processing agreement in place with the third party that complies with GDPR. The data processing agreement is meant to ensure that Vola's sharing of your personal information with a third party does not jeopardize your privacy or your rights under GDPR.

Security of your personal information

The security of your personal information is important to Vola, and we make commercially reasonable efforts to keep your information safe. These efforts include cybersecurity and physical security measures, as well as restrictions on who at Vola can access your personal information.

Your privacy rights under GDPR

We respect the confidentiality of your personal information and seek to ensure you can exercise your rights with respect to such information. You have the right under this Privacy Policy, and by law if you reside within the EU, to:

- **Request access to your personal information.** The right to access, update, or delete the personal information we have on you, and to receive a copy of such data.
- **Request correction of the personal information that we hold about you.** The right to have any incomplete or inaccurate personal information we hold about you corrected.
- **Object to processing of your personal information.** This right exists where we are relying on a legitimate interest as the legal basis for our processing and you want to object to our processing of your personal information on this ground (*i.e.*, you ask us to stop processing your personal information because you believe there is no longer any need for us to do so).

- **Request erasure of your personal information.** You have the right to ask us to delete or remove personal information when there is no good reason for us to continue processing it.
- **Request the transfer of your personal information.** We will provide to you, or to a third-party you have chosen, your personal information in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw your consent.** You have the right to withdraw your consent to our use of your personal information. If you withdraw your consent, we may not be able to provide you with continued access to any products or services offered by Vola.

Changes to this Privacy Policy

We may update this Privacy Policy from time to time, and we will notify you of any changes by posting the new Privacy Policy on this webpage.

Additional information

If you have questions or would like additional information regarding Vola's Privacy Policy, please contact us at legal@voladynamics.com. You may also contact our Data Protection Officer, Elliott Nathanson, directly at Elliott.Nathanson@voladynamics.com.