
GDPR Privacy Notice

Bares Capital Management, Inc. (“BCM”) is committed to protecting all personal information and recognizes its obligations to update the privacy policies and procedures to comply with the requirements of GDPR. This privacy notice will explain how our organization uses personal data.

What data do we collect?

BCM collects the following data:

- Personal identification information (Name, email address, phone number, etc.)
- Transaction history and account balances
- Assets and income
- Custodian and account numbers

How do we collect your data?

BCM collects your information when:

- You share information on applications or forms.
- You seek advice about your investments.
- You enter into an investment advisory contract.

How will we use your data?

BCM collects your data:

- For our everyday business purposes such as to process your transactions, maintain your account(s), respond to court orders and legal investigations.
- For our marketing purposes in order to offer our products and services to you.

BCM will NOT share your data for joint marketing with other financial companies, nor will BCM share your information about transactions, experiences, or account balances with our affiliates for everyday business purposes or to market to you.

How do we store your data?

BCM uses security measures to ensure GDPR compliance relative to EU clients. These

measures include, but are not limited to, data minimization, storage limitations, computer safeguards, and secured files and buildings.

BCM will continue to share your information as described above when you are no longer our customer. However, BCM is prepared to meet its “Right to Erasure” obligation as required.

Marketing

BCM does not share your personal information with our affiliates or non-affiliates for marketing purposes. BCM does not jointly market with nonaffiliated financial companies.

What are your data protection rights?

BCM would like to make sure you are fully aware of all your data protection rights. Every user is entitled to the following:

The right to access - You have the right to request copies of your personal data held by BCM.

The right to rectification - You have the right to request that BCM corrects any information you believe is inaccurate. You also have the right to request that BCM completes information you believe is incomplete.

The right to erasure - You have the right to request that BCM erase your personal data, under certain conditions.

The right to restrict processing - You have the right to request for BCM to restrict the processing of your personal data, under certain conditions.

The right to object to processing - You have the right to object to BCM's processing of your personal data, under certain conditions.

The right to data portability - You have the right to request for BCM to transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at:

Call us: (512) 542-1083

Or email us: info@barescapital.com

What are cookies?

Cookies are text files placed on your computer to collect standard Internet log information and behavior information.

For further information, visit allaboutcookies.org.

How do we use cookies?

BCM does not use cookies on our website.

What types of cookies do we use?

BCM does not use cookies on our website.

How to manage cookies

BCM does not use cookies on our website.

Privacy Notice of other websites

BCM's privacy notice applies only to our website.

Changes to our privacy notice

BCM keeps its privacy notice under regular review. This privacy notice was last updated on December 13, 2021.

How to contact us

If you have any questions about BCM's privacy notice, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

Email us at: info@barescapital.com

Call us: (512) 542-1083

Or write to us at: Bares Capital Management, Inc
12600 Hill Country Blvd, Suite R-230
Austin, Texas 78738

How to contact the appropriate authority

Should you wish to report a complaint or if you feel that BCM has not addressed your concern in a satisfactory manner, you may contact the European Data Protection Supervisor.

Email: edps@edps.europa.eu

Address: Rue Wiertz 60
Office: Rue Montoyer 30, 6th floor
1047 Bruxelles-Brussel