

Data Privacy Notice

March 2019

Rothschild & Co is responsible for ensuring that it uses your personal data in compliance with data protection law. The purpose of this notice is to explain what personal data Rothschild & Co collects and how Rothschild & Co uses it. For the purposes of data protection law, Rothschild & Co is a data controller in respect of your personal data.

In this notice when we refer to “Rothschild & Co” we mean Rothschild & Co Wealth Management UK Limited and Rothschild & Co Bank International Limited. “Personal data” means any data that can be used to identify you or that Rothschild & Co can link to you and which Rothschild & Co has in its possession or control.

1.1 Personal data that Rothschild & Co collects

Rothschild & Co will collect and process the following personal data:

- (a) **Information that you or someone acting on your behalf provides to Rothschild & Co or its Associates.** This includes information about you that you give Rothschild & Co by filling in forms or by communicating with Rothschild & Co, whether face-to-face, by phone, email or otherwise.
- (b) **Information Rothschild & Co collects or generates about you.** This includes:
 - information about your or the relevant client or account holder’s transactions and financial information;
 - data that Rothschild & Co collects about your use of Rothschild & Co’s IT systems (e.g. eAccess or ArrowOnline);
 - reports for tax reporting (e.g. Foreign Account Tax Compliance Act) or compliance with legal or regulatory obligations (e.g. suspicious activity reports);
 - recordings of telephone calls between you and Rothschild & Co.
- (c) **Information Rothschild & Co obtains from other sources.** This includes:
 - referrals from intermediaries (e.g. professional advisers);
 - personal data that Rothschild & Co collects from background checks Rothschild & Co may perform on you which may include electronic identity verification, your credit history (as relevant to banking services), your directorships (if any) and enhanced due diligence reports;
 - personal data that Rothschild & Co collects from data bases, portals and public information including adverse media checks.

1.2 Uses of your personal data

- (a) Personal data may be stored and processed by Rothschild & Co in the following ways and for the following purposes:

- to provide Rothschild & Co's products and services, including processing instructions and providing confirmations, advice and statements;
- to assess and process applications, verify your identity (including for credit assessment and fraud prevention purposes), assess your ability to meet your financial commitments and manage Rothschild & Co's relationship with you;
- to contact you in connection with your account with Rothschild & Co and the products and services that Rothschild & Co provides to you;
- to perform the contract with you (including performing Rothschild & Co's obligations and exercising Rothschild & Co's rights under the relevant Terms and Conditions);
- to engage in marketing and business development activity and to advise you of other products and services similar to those which you receive from Rothschild & Co;
- to notify you about changes to Rothschild & Co's service;
- to carry out financial risk assessments and for risk reporting and risk management;
- to comply with Rothschild & Co's legal and regulatory obligations. This includes reporting to the relevant authorities, complying with anti-money laundering obligations and tax reporting obligations;
- to prevent and respond to actual and potential fraud or illegal activities; or
- to look into any complaints or queries you may have.

(b) Rothschild & Co is entitled to use personal data in these ways because:

- Rothschild & Co needs to do so in order to perform its obligations and exercise its rights in connection with your contract with Rothschild & Co (or in order to take steps, at your request, in preparation for entering into a contract with you);
- Rothschild & Co has legal and regulatory obligations that Rothschild & Co has to discharge;
- Rothschild & Co may need to do so in order to establish, exercise or defend its legal rights or for the purpose of legal proceedings; or
- the use of personal data as described is necessary for Rothschild & Co's legitimate business interests (or the legitimate interests of one or more of Rothschild & Co's Associates), where those interests are not overridden by prejudice to your privacy, such as:
 - to effectively and efficiently administer and manage the operation of the Rothschild & Co & Co Group business and websites;
 - to undertake business research and analysis;
 - to maintain compliance with internal policies and procedures; or
 - to maintain effective information management systems.

1.3 Disclosure of personal data to third parties

(a) Rothschild & Co may disclose personal data to its Associates in the circumstances described below:

- to provide the services, products or accounts or perform its obligations in connection with your contract;
- for the management and administration of the Rothschild & Co & Co Group business;
- for internal policies and procedures within the Rothschild & Co & Co Group;

Where personal data is disclosed to its Associates, Rothschild & Co will take steps to ensure that the personal data is accessed only by those persons who need to do so for the purposes described in this notice.

(b) Rothschild & Co may also disclose personal data outside of Rothschild & Co and its Associates, as follows:

- to third party agents, service providers or contractors, bound by obligations of confidentiality, who will only use personal data on Rothschild & Co's behalf for the purposes described in this notice;
- to third parties relevant to the investment management and/or custodial services that Rothschild & Co provides. This may include for example counterparties to transactions, professional advisers, stock exchanges or regulators;
- to credit reference agencies for verification and credit reference purposes and to debt recovery agencies if you default on a debt. Credit reference agencies may retain a record of searches or enquiries undertaken by Rothschild & Co in respect of you which may form part of your credit history;
- to the prospective buyer, for due diligence purposes, if Rothschild & Co and/or Rothschild & Co's Associates restructure or sell any of its business or assets;
- to the extent required by law, regulation or court order for example if Rothschild & Co is under a duty to disclose personal data in order to comply with any legal or regulatory obligation; and
- in order to establish, exercise or defend Rothschild & Co's legal rights, for example if Rothschild & Co needs to obtain external legal advice or provide personal data in connection with judicial proceedings.

1.4 Transfers of personal data outside the European Economic Area

(a) Personal data may be transferred to, and stored at, a destination outside the UK, the European Economic Area (“**EEA**”) and Guernsey. It may also be stored and processed by staff operating outside of the UK, the EEA and Guernsey, who work for Rothschild & Co's Associates or Rothschild & Co's suppliers.

(b) Where Rothschild & Co transfers personal data outside the UK, the EEA and Guernsey, Rothschild & Co will ensure that it is protected in a manner that is consistent with how personal data will be protected by Rothschild & Co in the UK, the EEA and Guernsey. This may be achieved in one of the following ways:

- the country that Rothschild & Co sends the data to might be approved by the European Commission or by a relevant data protection authority; or
- the recipient might have signed a contract based on “model contractual clauses” approved by the European Commission or by a relevant data protection authority, obliging them to protect the personal data that they receive; or
- where the recipient is located in the US, it might be a certified member of the EU-US Privacy Shield scheme.

- (c) In other circumstances the law may permit Rothschild & Co to otherwise transfer personal data outside the UK, the EEA and Guernsey. In all cases, however, Rothschild & Co will ensure that any transfer of personal data is compliant with applicable data protection laws.
- (d) You can obtain further details of the protection given to your personal data when it is transferred outside the UK, the EEA and Guernsey (including a copy of the standard data protection clauses which Rothschild & Co has entered into with recipients of your personal data) by contacting Rothschild & Co in accordance with the "Contacting Rothschild & Co" section below.

1.5 Retention of personal data

How long Rothschild & Co holds personal data for will vary. The retention period will be determined by various criteria including:

- (a) the purpose for which Rothschild & Co is using it – Rothschild & Co will need to keep the data for as long as is necessary for that purpose; and
- (b) legal obligations – laws or regulation may set a minimum period for which Rothschild & Co has to retain personal data.

1.6 Rights in relation to personal data

- (a) You have a number of legal rights in relation to the personal data that Rothschild & Co holds about you. These rights include:
- the right to obtain information regarding the processing of your personal data and access to the personal data which Rothschild & Co holds about you (subject to certain exceptions as set out in applicable data protection laws);
 - the right to request that Rothschild & Co rectify your personal data if it is inaccurate or incomplete;
 - the right to request that Rothschild & Co erase your personal data in certain circumstances. Please note that there may be circumstances where you ask Rothschild & Co to erase your personal data but Rothschild & Co is legally entitled or required to retain it;
 - the right to object to, and the right to request that Rothschild & Co restrict, its processing of your personal data in certain circumstances. Again, there may be circumstances where you object to, or ask Rothschild & Co to restrict, its processing of your personal data but Rothschild & Co is legally entitled to continue processing your personal data and / or to refuse that request;
 - in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that Rothschild & Co transmit such data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to Rothschild & Co and is subject to certain exceptions as set out in applicable data protection laws;
 - the right to withdraw your consent, although in certain circumstances it may be lawful for Rothschild & Co to continue processing your data where Rothschild & Co has another legitimate reason (other than consent) for doing so. Rothschild & Co is not relying on your consent in order to process your personal data for the purposes and in the manner set out in this notice;
 - the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by Rothschild & Co. You also have the right to appeal (i) decisions of the data protection regulator and (ii) against any failure of the data protection regulator to notify you of any investigations or the progress of those investigations; and

- where Rothschild & Co Bank International Limited is the data controller, the right in certain circumstances to be notified of rectification, erasure and restrictions in respect of the personal data.
- (b) You can exercise your rights by contacting Rothschild & Co using the details set out in the “Contacting Rothschild & Co” section below.
- (c) You can find out more information about your rights by contacting, as applicable, the UK data protection regulator, the Information Commissioner, or by searching their website at <https://ico.org.uk/> or the Guernsey data protection regulator, the Guernsey Data Protection Commissioner at enquiries@dataci.org or by searching their website at <https://dataci.gg>.

1.7 Contacting Rothschild & Co

If you would like further information about Rothschild & Co’s processing of your personal data or the exercise of any of the rights referred to above, please address questions, comments and requests to the Data Protection Officer of the Rothschild & Co & Co Group at data.protection@rothschildandco.com.