



Privacy Notice – (Applicants)

Rothschild & Co Bank AG ("Rothschild & Co") is responsible for ensuring that it uses your personal data in compliance with data protection law. The purpose of this Privacy Notice is to explain what personal data Rothschild & Co collects and how Rothschild & Co uses it.

Please see below further information on the following topics:

1. Rothschild & Co
2. Personal data collected by Rothschild & Co
3. Uses of your personal data
4. Disclosure of your information to third parties
5. Place of storage of personal data
6. International transfers of personal data
7. Risks related to Internet use
8. Duration of personal data retention
9. Your rights
10. Contact us

1. Rothschild & Co

Where we use the terms "**Rothschild & Co**", "**we**", "**us**" and "**our**" in this Privacy Notice, we are referring to the relevant Rothschild & Co group company with whom you are applying for a job.

Where we use the term your "**Application**" in this Privacy Notice, we are referring to your application to work at Rothschild & Co.

For the purposes of data protection law, Rothschild & Co is a data controller in respect of your personal data.

2. Personal data collected by Rothschild & Co

Rothschild & Co will collect and process (e.g. obtain, record, use, share or hold) the personal data about you which is useful or necessary for us by virtue of our status as potential future employer. Such personal data includes, inter alia:

- a. **Information that you provide to the Rothschild & Co group.** This is likely to include:
 - i. personal details such as, but not limited to, your full name, email address, contact details, employment history, qualifications (both academic and professional) and compensation history; and
 - ii. any other details you provide in support of your Application, including (but not limited to) information contained in your CV and/or covering email and your reasons for applying to Rothschild & Co.

This Privacy Notice is relevant for those applying for vacancies with Rothschild & Co in Switzerland

- b. **Information we, or other members of the Rothschild & Co group, otherwise collect about you.** This includes the following information that is collected in connection with your Application:
 - i. personal data that we collect through your communication and correspondence with us (including but not limited to your full name, email address and the content, date and time of your email correspondence); and
 - ii. information obtained in relation to any interviews and assessments (including online assessments) with you.
- c. **Information we obtain from other sources.** This includes personal data that we collect from screening, background and/or reference checks that we may perform on you as part of the Application or recruitment process including, but not limited to, criminal background check, debt collection report and work history check.

3. *Uses of your personal data*

Your personal data may be stored and processed by Rothschild & Co in the following ways and for the following purposes:

- a. to consider your Application (including, in some cases, (i) verifying your qualifications and references with those third parties you name; and (ii) doing a background check with third-parties such as a verification company, a public authority or another publicly available source) and your suitability for the job for which you have applied;
- b. to meet our legal and regulatory obligations;
- c. to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- d. to safeguard our legitimate interests such as:
 - i. to effectively assess and verify your skills, qualifications and/or the strength and merits of your Application and your suitability for the role applied for;
 - ii. to effectively and efficiently administer and manage the operation of our business;
- e. to maintain consistent practices and procedures with respect to the recruitment of personnel across the Rothschild & Co group, and the collection, use, disclosure, transfer and processing of personal data across all Rothschild & Co group companies worldwide. These practices and procedures include the effective recording, management and administration of personal data;
- f. to monitor diversity and equal opportunities regarding applicants to the Rothschild & Co group where we have a legal basis to process such information (for the avoidance of doubt, where necessary we will separately seek your consent before processing such information); and
- g. to maintain contact with you in the future and notify you of job vacancies within the Rothschild & Co group that you might be interested in.

If you are subsequently offered and accept employment at Rothschild & Co, the information we collect during the recruitment process will become part of your employment record.

Finally, if we intend to process your personal data for a purpose other than those listed above, we shall communicate this new purpose to you in accordance with the legal and regulatory framework applicable to us.

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4. Disclosure of your information to third parties

Within the Rothschild & Co group

Rothschild & Co may disclose your personal data to other members of the Rothschild & Co group for the purposes of:

- a. the management and administration of the Rothschild & Co group business, including the maintenance of the centralised databases storing personal data;
- b. enabling the performance of the functions that each of the Rothschild & Co group businesses may perform relating to regional or global HR decisions within the Rothschild & Co group; and
- c. assessing compliance with applicable laws, rules and regulations, and internal policies and procedures within the Rothschild & Co group.

Where personal data is disclosed to other members of the Rothschild & Co group, we will take all necessary steps to ensure that the personal data is accessed only by those Rothschild & Co group personnel that have a need to do so and solely for the purposes described in this Privacy Notice.

Outside the Rothschild & Co group

In addition to the above, Rothschild & Co (and the other Rothschild & Co group companies to whom your personal data is disclosed) may share your personal data outside the Rothschild & Co group (all recipients are "**Third Parties**"):

- a. to third party agents or contractors, bound by obligations of confidentiality, in connection with the processing of your personal data for the purposes described in this Privacy Notice. This may include, *inter alia*, outsourced HR service providers, recruiters, IT and communications service providers, law firms, accountants and auditors;
 - b. to other partners and/or financial institutions, tax authorities, professional associations, credit control agencies and/or debt collection agencies;
 - c. to a regulator or law enforcement agency if we are requested to do so (but only to the extent that we are permitted to make such disclosure by law); and
- to the extent required by law, regulation or court order, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation.

5. Place of storage of personal data

Employee data are stored in the Bank's support systems implemented locally in Switzerland.

The HR system, is operated and managed by the Rothschild & Co Group and some data is shared in the UK to support recruitment process.

6. International transfers of personal data

Your personal data may be transferred to and stored in databases hosted and maintained outside Switzerland, including in France, Guernsey, the Republic of Ireland and the Netherlands. It may be stored and processed by other Rothschild & Co group companies and/or Third Parties in other countries.

Where your personal data is transferred outside Switzerland, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in Switzerland. In all cases, we will ensure that any transfer of your personal data is compliant with applicable data protection law. In particular, where the transfers of personal data shall lead to a transfer of personal data to a State which is not considered to provide an adequate level of protection from a Swiss perspective, we will ensure, to the extent necessary, that safeguards are in place, such as the use of standard contractual clauses (e.g. the Standard Contractual Clauses published by the European Commission, including the so-called "Swiss finish") or other arrangements.

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The list of destination countries can be found as an Appendix (page 6) in this document.

You can obtain more details about the protection given to your personal data when it is transferred outside Switzerland by contacting the Data Protection Officer *via* the contact address given in section 10 below.

7. Risks related to Internet use

You and we shall share personal data via email and via the Internet. This may lead to the disclosure of your personal data outside of Switzerland, as explained under section 6 above.

Any connection to the Internet - even crypted - carries the risk of unintentionally downloading viruses or cookies, or of allowing third parties to surreptitiously access your computer and the data on it. **You therefore acknowledge and accept this risk.**

Similarly, no security device, even one based on the most recent technical developments, can guarantee absolute security both on our part and on yours. The terminal (e.g. your computer) is beyond our control and may constitute a weak point in the system. In particular, there is a latent risk that a third party may access your terminal without your knowledge when sharing data via the Internet. **Therefore, you understand and accept that, despite all security measures, we cannot, for technical reasons, assume any responsibility in this respect.**

8. Duration of personal data retention

We shall keep your personal data for as long as necessary. The retention period will thus vary, depending be determined by **various criteria including:**

- a. the purpose for which we are using it – we 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 we have to keep your personal data.

In some instances, we may retain your information to consider you for other roles and future opportunities at Rothschild & Co which may be of interest to you. If you do not want us to retain your information, or want us to update it at any stage, please contact the Data Protection Officer *via* the contact address given in section 10 below.

9. Your rights

You have a number of legal rights in relation to the personal data that we hold about you and you can exercise your rights by contacting the Data Protection Officer *via* the contact address given in section 10 below.

These rights include:

- a. the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- b. the right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so. We are not relying on your consent in order to process your personal data for the purposes and in the manner set out in this Privacy Notice;
- c. where the processing of your data is based on your consent, you have the right to receive your personal data in a structured, commonly used and machine-readable format and/or request that we transmit those 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 us (and not, for the avoidance of doubt, information we, or other

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members of the Rothschild & Co group, otherwise collect about you or information we obtain about you from other sources);

- d. the right to request that we rectify your personal data if it is inaccurate or incomplete;
- e. the right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data but we are legally entitled to retain it;
- f. the right to request that we restrict our processing of your personal data if they are no longer necessary for the purposes for which they were collected or if they are no longer lawful for other reasons (unless we are legally entitled to refuse that request);
- g. the right to object to our processing of your personal data in certain circumstances. Please note that there may be circumstances where you object to our processing of your personal data but we are legally entitled to continue to process it; and
- h. the right to obtain additional information from the Data Protection Officer whose details are set out in section 10 below. If you consider that the response given is unsatisfactory, you have the right to lodge a complaint with the Federal Data Protection and Information Commissioner (FDPIC) (Eidgenössischer Datenschutz- und Öffentlichkeitsbeauftragter (EDÖB)).

10. Contact us

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed in this Privacy Notice, please contact the Data Protection Officer of Rothschild & Co group on data.protection@ch.rothschildandco.com

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APPENDIX

List of countries to which personal data may be transferred

Kindly find below the list of countries to which personal data may be transferred or made available:

Switzerland
France
UK
Guernsey
Republic of Ireland
Netherlands

Furthermore, please note that personal data may be communicated to other countries depending on the instructions given to the Bank by the Client (or an authorised representative). For example, information on the transfer initiator shall be communicated to the corresponding bank located abroad in the context of a payment instruction in a foreign currency.

You can obtain more details on the protection afforded to personal data when it is transferred out of Switzerland (including an overview of the safeguards in place) by contacting the Bank at the following address:

Rothschild & Co Bank AG
Data Protection Administration
Zollikerstrasse 181
8034 Zurich
Switzerland

E-Mail: data.protection@ch.rothschildandco.com