



Data Privacy Notice

Rothschild & Co is responsible for ensuring that it uses your personal data in compliance with data protection law. The purpose of this notice (the “Privacy 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. “Personal data” is 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.

In this Privacy Notice when we refer to “Rothschild & Co” or “we”/“us”/“our” we mean Rothschild & Co and our Associates. You can find contact details for our Associates, and the details of the data controllers within Rothschild & Co, by contacting us on data.protection@rothschildandco.com.

Personal data that Rothschild & Co collects

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

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, signing up for services on our website or by communicating with Rothschild & Co, whether face-to-face, by phone, e-mail or otherwise. If you are a client or are connected with one of our client’s matters, this may include personal data about you or others that is provided to Rothschild & Co in connection with the provision of services to that client.

Information Rothschild & Co collects or generates about you. We will also collect information about you when you use our services or when we otherwise interact or correspond with you. We use various technologies to collect and store information when you visit our websites. We may, for example, collect information about the type of device you use to access the websites, your IP address and your geographic location, the operating system and version, your browser type, the content you view and features you access on our websites, the web pages and the search terms you enter on our websites. For information about how we use Cookies and the choices you may have, you can request a copy of our Cookies Policy by emailing data.protection@rothschildandco.com.

If you are a client, or are connected with one of our client’s matters, this information may include:

- information about you, your transactions, financial information and relationship to others;
- data that Rothschild & Co collects about your use of Rothschild & Co’s IT systems;
- reports and information for tax reporting (e.g. FATCA) or compliance with legal or regulatory obligations (e.g. insider lists, regulator information requests);
- (where required by legal or regulatory obligations or otherwise where we have a specific legal basis) recordings of telephone calls between you and Rothschild & Co.

Information Rothschild & Co obtains from other sources. If we collect or receive your personal data in the context of our provision of services, we might receive information from third parties such as your employer, other parties relevant to the services we are providing (e.g. counterparties in transactions) and others such as regulators and authorities. That information could include your name, contact details, employment details and other information relevant to the services that we are providing to our client.



Uses of your personal data

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 our clients;
- verify your identity (including for fraud prevention purposes), assess your ability to meet your financial commitments (if any) and manage Rothschild & Co's relationship with you and/or the client to whom you are connected;
- to contact you in connection with your work with Rothschild & Co and the products and services that Rothschild & Co provides to you or a client to whom you are connected;
- to perform the contract with you or a client/supplier to whom you are connected (including performing Rothschild & Co's obligations and exercising Rothschild & Co's rights);
- to engage in marketing and business development activity and to advise you or a client to whom you are connected of other products and services similar to those which you or a client to whom you are connected receive from Rothschild & Co and/or its Associates;
- to notify you about changes to Rothschild & Co's service;
- to carry out financial risk assessments, risk mitigation activities 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 use it to prevent and respond to actual and potential fraud or illegal activities; or
- to use it to look into any complaints or queries you or a client/supplier to whom you are connected may have.

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

- Consent - we may (but usually do not) need your consent to use your personal data. You can withdraw your consent by contacting us (see below).
- Performance of a contract - we may need to collect and use your personal data to enter into a contract with you or to perform our obligations under a contract with you or a client to whom you are connected.
- Legitimate interest - we may use your personal data for our legitimate interests, some examples of which are given above.
- Compliance with law or regulation - we may use your personal data as necessary to comply with applicable law/regulation.

Disclosure of personal data to third parties

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

- to provide the services or perform its obligations in connection with your contract or the contract of a client/supplier with whom you are connected;
- for the management and administration of the Rothschild & Co business;
- for the management and administration of internal policies and procedures within Rothschild & Co.



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 Privacy Notice.

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 Privacy Notice;
- to third parties relevant to the services outlined in the contract with you or the contract of a client/supplier with whom you are connected. This may include for example counterparties to transactions, professional advisers, stock exchanges or regulators;
- to the prospective counterparty, for due diligence purposes, if Rothschild & Co and/ or Rothschild & Co's Associates restructure or sell any of its or their business or assets (for the avoidance of doubt, your personal data would only be transferred in such circumstances to the extent that such a transfer was required for the purposes of due diligence and was subject to appropriate security protections e.g. anonymisation and/or confidentiality restrictions);
- 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.

Transfers of personal data outside the European Economic Area

Personal data may be transferred to, and stored at, a destination outside the UK or the European Economic Area ("EEA"). It may also be stored and processed by staff operating outside of the UK or the EEA, who work for Rothschild & Co's Associates or Rothschild & Co's third party agents, service providers or contractors.

Where Rothschild & Co transfers personal data outside the UK or the EEA, 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 and the EEA. 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.

In other circumstances the law may permit Rothschild & Co to otherwise transfer personal data outside the UK or the EEA. In all cases, however, Rothschild & Co will ensure that any transfer of personal data is compliant with applicable data protection law.

You can obtain further details of the protection given to your personal data when it is transferred outside the UK or the EEA by contacting Rothschild & Co in accordance with the "Contacting Rothschild & Co" section below.



Retention of personal data

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

- 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
- legal obligations - laws or regulation may set a minimum period for which Rothschild & Co has to retain personal data.

Rights in relation to personal data

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;
- 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 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;
- the right to withdraw your consent, although in certain circumstance 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 Privacy Notice; and
- the right to lodge a complaint with the relevant data protection authority if you think that any of your rights have been infringed by Rothschild & Co.

You can exercise your rights by contacting Rothschild & Co using the details set out in the "Contacting Rothschild & Co" section below.

You can find out more information about your rights by contacting the relevant data protection authority. We can, on request, tell you which data protection authority is relevant to the processing of your personal data.

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 data.protection@rothschildandco.com.