



# Privacy Notice - Rothschild & Co Martin Maurel(RMM)

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## *Why is this privacy notice important?*

At Rothschild & Co, we are committed to protecting the privacy and security of your personal data. For the purposes of data protection legislation, Rothschild & Co is responsible for processing your personal data.

Transparency in how we process your personal data is crucial. This Privacy Notice will inform you of how we collect, use, store and protect your personal data. It also sets out what your rights are and how you can exercise them.

## *What is the scope of this leaflet?*

This leaflet applies to the Rothschild & Co Martin Maurel(RMM) Group which is composed of the following entities:

- Rothschild & Co Martin Maurel and its branches:
  - o Rothschild & Co Wealth Management Belgium;
  - o Rothschild & Co Wealth Management Luxembourg;
  - o Rothschild Martin Maurel Monaco.
- Rothschild & Co Asset Management
- Wargny BBR

## *To whom does this Privacy Notice apply?*

This privacy notice applies to the parties with whom we do business, including:

Family members of the person concerned;

Heirs and assigns;

- Legal representatives and authorised persons of a client legal entity or a service provider

(Mandates/delegations of authority);

- Beneficiaries of insurance policies and trusts

## *How to navigate in this privacy notice*

The following section covers each of the following areas.

1. Personal data collected by Rothschild & Co
2. Processing your personal data
3. Disclosure of your information to third parties
4. International transfers of personal data
5. Retention of personal data
6. Security of your personal data
7. Your rights
8. Changes to this Privacy Notice
9. Contact us



## 1. Personal data collected by Rothschild & Co

Rothschild & Co collects and uses personal data that is useful to us or necessary to us through our client relationships.

This may include information that you have provided and may also include information that we, or other members of the Rothschild & Co Group, collect about you from other sources. These may include:

- Identification information;
- Private and/or personal contact information;
- Information about the family situation of the individual concerned;
- Economic, financial and tax information;
- Information on education and employment;
- Banking and financial information;
- Information about the habits of the individual and their preferences in connection with their use of Rothschild & Co products and services;
- Data from the video protection system when the data subject goes to Rothschild & Co premises or as part of the data subject's withdrawals or payments;
- Geolocation data in connection with withdrawals or payments by the data subject;
- Data as part of Rothschild & Co's dealings with the individual via the website, telephone conversations, interviews, meetings and emails;
- Information about the data subject's device (IP address, unique technical characteristics and credentials);
- Login IDs or custom security devices used to log in to the Rothschild & Co website and applications, or run a payment service;
- Information about the operating system and its version, the type of browser, the content the data subject consults and the characteristics by which they access Rothschild & Co websites and pages, and the search terms that the data subject captures on Rothschild & Co websites.
- Information about the data subject's transactions and financial data;
- Data that Rothschild & Co collects on the individual's use of Rothschild & Co's IT systems and information about their device;
- Reporting relating to tax reporting obligations or compliance with specific legal or regulatory obligations of the finance sector;
- If necessary, in accordance with legal or regulatory obligations, records of telephone conversations between the individual and Rothschild & Co



## 2. Processing your personal data

Your personal data may be used by Rothschild & Co as follows:

- a) Operating our business and providing services to clients (including transaction administration, the provision of a range of financial services and the performance of Rothschild & Co's obligations under the contracts);
- b) Conducting KYC and other due diligence as is necessary to enable us to comply with anti money laundering and anti bribery and corruption laws and regulations as well as Rothschild & Co's related policies and procedures;
- c) Perform due diligence and assess the performance of the management teams, the general management of the companies and the shareholders;
- d) Conducting a business relationship analysis, client relationship management and related purposes to enhance service delivery;
- e) Conducting market research on a company or sector of activity, including with the help of key experts;
- f) Engage in marketing and business development activities;
- g) Conducting risk assessments;
- h) For billing purposes;
- i) Respond to periodic verifications and reviews conducted by competent authorities, correspondent banks, other financial corporations, law firms, consultants and other in scope suppliers/service providers and law enforcement authorities (to enable them to comply with relevant laws and regulations or to undertake investigations where necessary);
- j) To comply with Rothschild & Co's legal and regulatory obligations. This includes reporting to relevant authorities, compliance with AML and tax reporting requirements;
- k) Prevent and respond to actual or potential illegal fraud or activities.

We are entitled to use your personal data in the following situations:

- a) **Consent** : we may need your consent to use your personal data. Where relevant, you may withdraw your consent by contacting us (see 'Contact Us' section below).
- b) **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.
- c) **Legitimate Interest** : we may use your personal data for our legitimate interests.
- d) **Compliance with Law or Regulation** : we may use your personal data from time to time to comply with applicable law or regulation.



### 3. 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:

- i. To provide services or fulfil its obligations;
- ii. Enable the management and administration of Rothschild & Co's business; and
- iii. For the management and administration of internal policies and procedures across Rothschild & Co.

Where personal data is disclosed to other members of the Rothschild & Co group, we will take the necessary steps to protect the Rothschild & Co group's personal data.

#### **Outside the Rothschild & Co Group**

In addition, Rothschild & Co (and other Rothschild & Co Group members) may share your personal data outside of the Rothschild & Co Group and may rely on other third parties for the processing of your personal data for the purposes described in this Privacy Notice, including:

- iv. To third party suppliers, service providers or contractors, bound by confidentiality obligations, in connection with the processing of your personal data for the purposes described in this Privacy Notice. These may include outsourced client relationship management platforms, IT and communication service providers, legal firms, accountants and auditors;
  - v. To a relevant authority or law enforcement agency, if required to do so by us ;
  - vi. Other financial institutions, tax administrations, trade associations, companies/insurance funds sickness, social security bodies, credit control bodies and/or debt recovery bodies, if any;
- a) To certain regulated professionals such as lawyers, notaries, rating agencies or auditors in specific circumstances (e.g. litigation, audit, etc.) or insolvency administrators in the event of private bankruptcy;
- vii. To the extent required by law, regulation or court order, e.g. if we are required to disclose your personal data in order to comply with any legal obligation.

Sharing your personal data with third parties may involve storing your personal data in the cloud, and some third parties provide services involving the application of artificial intelligence.



#### 4. International transfers of personal data

Your personal data may be transferred and stored in databases hosted and kept in a jurisdiction other than the one in which we operate (the "**Local Jurisdiction**"). These other jurisdictions may include destinations outside the European Economic Area.

Where your personal data is transferred outside of the local jurisdiction, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the local jurisdiction. This can be done in different ways, for example:

- a) The country in which your personal data is sent may be approved by the European Commission (or by a data protection authority or other governmental authority) as a source of protection equivalent to that of the local jurisdiction; or
- b) The recipient may have signed a contract that incorporates 'standard contractual clauses' or similar, approved by the European Commission (or by a data protection authority or other governmental authority), obliging him to protect your personal data.

In other circumstances, law may allow us to transfer your personal data outside of local jurisdiction.

You can obtain more details about the protection afforded to your personal data when it is transferred outside of local jurisdiction by contacting us (see 'Contact Us' section below).

#### 5. Retention of personal data

The length of time your personal data is retained will vary. The shelf life will be determined by various criteria including:

- a) **The purpose for which we use it** : we will have to keep the data for as long as necessary for that purpose; and
- b) **Legal Obligations**: laws or regulations may set a minimum period for which we must keep your personal data.

You can obtain more details about the retention of your personal data by contacting us in accordance with the 'Contact Us' section below.

#### 6. Security of your personal data

We have put in place appropriate technical and organisational measures to ensure an optimal level of security. These measures are designed to avoid any circumstances in which personal data is accidentally or unlawfully destroyed, lost or modified, or misdisclosed or accessed.



## 7. Your rights

You have a number of legal rights in relation to the personal data we hold about you. You can exercise your rights by contacting us (see section 'Contact us' below).

These rights include:

- a) **Right of access** : every natural person has the right to obtain confirmation that the data concerning him is or is not processed and if so, he has the right to access the said data;
- b) **Right to withdraw your consent**: when we process your personal data based on your consent, you have the right to withdraw your consent at any time. Please note, however, that we may still be permitted to process your personal data if we have a legitimate reason to do so;
- c) **Right to portability**: data subjects have the right to receive their personal data provided to a controller in a structured, commonly used and legible format and the right to transmit that data to another controller without the controller to whom the personal data has been communicated obstructing ;
- d) **Right of rectification**: the data subject has the right to obtain from the controller, as soon as possible, the rectification of the personal data concerning him that is inaccurate. Given the purposes of the processing, the data subject has the right to obtain that incomplete personal data is completed, including by providing a supplementary statement;
- e) **Right of erasure**: the data subject has the right to obtain from the controller the erasure, as soon as possible, of personal data concerning him and the controller has the obligation to erase these personal data as soon as possible, in case of legitimate reason ;
- f) **Right to limitation of processing**: the data subject has the right to obtain from the controller the limitation of processing in case of legitimate reason. Without legitimate cause we have a legal right to refuse this request;
- g) **Right to object to processing**: the data subject has the right to object at any time, for reasons relating to his or her particular situation, to processing of personal data concerning him or her, including profiling based on these provisions. The controller shall no longer process personal data unless it demonstrates that there are legitimate and compelling grounds for the processing that supersedes the interests and rights and freedoms of the data subject, or for the finding, exercise or defence of rights in court ;
- h) **Right to file a complaint with the supervisory authority** : the right to file a complaint with the competent supervisory authority if you believe that any of your rights has been violated by us. Details of the relevant supervisory authorities are set out in the Annexe.

## 8. Changes to this Privacy Notice



The privacy notice needs to be updated regularly. Please refer to the latest version on our website ([www.rothschildandco.com](http://www.rothschildandco.com)) or by contacting us directly (see 'Contact Us' section below).

## 9. Contact us

If you wish to obtain more information about 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 [dpo@rothschildandco.com](mailto:dpo@rothschildandco.com)

# Appendix - Supervisory authorities

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<b>France</b>	<b>Commission Nationale de l'Informatique et des Libertés</b> (CNIL) <a href="http://www.cnil.fr">www.cnil.fr</a>
<b>Belgium</b>	<b>Data Protection Authority</b> (Belgian Data Protection Authority) <a href="http://www.dataprotectionauthority.be">www.dataprotectionauthority.be</a>
<b>Luxembourg</b>	<b>National Data Protection Commission</b> (CNPD) <a href="http://www.cnpd.public.lu">www.cnpd.public.lu</a>
<b>Monaco</b>	<b>Nominative information control committee</b> (CCIN) <a href="http://www.ccin.mc">www.ccin.mc</a>

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