



Data Privacy Notice

September 2023

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 personal data from the following different sources:

- (a) **Information that you or someone acting on your behalf provides to Rothschild & Co or other entities in the Rothschild & Co group.** 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 and applications (e.g., eAccess)
 - 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
 - Physical security data, including CCTV footage in our building.
- (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 and lending 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) Where Rothschild & Co has collected personal data about you, it will be stored and processed in any of the following different ways to:

- Provide Rothschild & Co's products and services, including processing instructions and providing confirmations, advice and statements
- Assess and process applications, verify your identity (including for credit assessments and fraud prevention purposes), assess your ability to meet your financial commitments and manage Rothschild & Co's relationship with you
- Contact you in connection with any account you have with Rothschild & Co and the products and services that Rothschild & Co provides to you, or in relation to accounts, products or services provided by Rothschild & Co to another person where you are a signatory or contact person
- Provide you with access to electronic applications and platforms (e.g., eAccess)
- Agree and perform a contract with you (including performing Rothschild & Co's obligations and exercising Rothschild & Co's rights under the relevant Terms and Conditions)
- Engage in marketing and business development activity and to advise you of other products and services similar or related to those which you receive from Rothschild & Co
- Send you occasional gifts and personal communication
- Notify you about changes to Rothschild & Co's service
- Carry out financial risk assessments and for risk reporting or risk management
- Comply with Rothschild & Co's legal and regulatory obligations and to comply with regulator requests. This includes reporting to the relevant authorities (including the FCA in the UK or GFSC in Guernsey), complying with anti-money laundering obligations and tax reporting obligations, and complying with regulatory expectations around how we deliver services to clients
- Prevent and respond to actual and potential fraud or illegal activities
- Allow us to monitor Rothschild & Co's relationship with you, and to seek to improve or develop the services offered by Rothschild & Co
- 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, including where relevant regulators have an expectation about the way Rothschild & Co provides services to clients
- Rothschild & Co may need to do so in order to establish, exercise or defend its legal rights or for the purpose of legal proceedings
- The use of personal data as described is necessary for Rothschild & Co's legitimate business interests (or the legitimate interests of one or more other entities in the Rothschild & Co group), 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 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
- In some, limited situations, you may have consented to Rothschild & Co's processing of your personal data. If this applies to how Rothschild & Co is processing your personal data, you will be able to withdraw your consent at any time by contacting us.

1.3 Disclosure of personal data to third parties

(a) Rothschild & Co may disclose personal data to other entities in the Rothschild & Co group 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 group business
- For internal policies and procedures within the Rothschild & Co group, including oversight or reporting relating to regulatory expectations.

Where personal data is disclosed to other entities in the Rothschild & Co group, 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 other entities in the Rothschild & Co group, 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 and/or banking services and/or lending services that Rothschild & Co provides. This may include for example counterparties to transactions, professional advisers, stock exchanges or regulators or where relevant credit card providers
- To third parties who provide services which allow us to monitor or improve our service offering, including providers of client surveys
- To third parties who, from time to time, assist us with offering or providing you with access to events or gifts as part of our ongoing relationship with you
- 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 counterparty, for due diligence purposes, if Rothschild & Co and/or other entities in the Rothschild & Co group restructure or sell any of its business or assets



- To the extent required by law, regulation or court order or regulatory request 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 to other jurisdictions

- (a) Personal data may be transferred to, and stored at, a destination outside the UK or Guernsey. It may also be stored and processed by staff operating outside of the UK or Guernsey, who work for other entities in the Rothschild & Co group or Rothschild & Co's suppliers or counterparties.
- (b) Where Rothschild & Co transfers personal data outside the UK 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 and Guernsey. This may be achieved in one of the following ways:
 - The country that Rothschild & Co sends the data to might be assessed by a relevant data protection authority as providing adequate protection for personal data rights and freedoms, or
 - The recipient might have signed a contract based on "model contractual clauses" approved by a relevant data protection authority, obliging them to protect the personal data that they receive.
- (c) In other circumstances the law may permit Rothschild & Co to otherwise transfer personal data outside the UK 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 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
 - 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 can find more information about your rights to complain on the website of the relevant data protection regulator, 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 your 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:
- Where Rothschild & Co Wealth Management UK Limited is acting as data controller: the UK data protection regulator, the Information Commissioner, or by searching their website at <https://ico.org.uk/> or
 - Where Rothschild & Co Bank International Limited is acting as data controller: the Guernsey data protection regulator, the Office of the Data Protection Authority at info@odpa.gg or by searching their website at <https://www.odpa.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 group at data.protection@rothschildandco.com.

You can also contact us as set out below:

Rothschild & Co Wealth Management UK Limited	Rothschild & Co Bank International Limited
Address: New Court, St Swithin's Lane, London, EC4N 8AL	Address: St Julian's Court, St Julian's Avenue, St Peter Port, Guernsey, GY1 3BP
Telephone: +44 (0)20 7280 5000	Telephone: +44 (0)1481 713713