

## Employee Privacy Notice

Rathbones is committed to protecting the privacy and security of your personal information, to providing clear information about how your personal data is processed and to complying with the data protection laws.

This information notice sets out how we collect and use your personal information during and after your employment with us, in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA 2018) and The Data Protection (Jersey) Law 2018. Please read this information notice carefully.

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### NOTE:

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### 1. Introduction – about this information notice

A.	<b>About us</b>
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	<p>In this information notice, references to 'we', 'us' or 'the Company' are to Rathbones Group Plc, a company registered in England and Wales (company number 01000403) with registered address at 8 Finsbury Circus, London, EC2M 7AZ or Rathbone Investment Management International Limited, a company registered in Jersey (company number 50503) with registered address at 26 Esplanade, St. Helier, Jersey JE1 2RB.</p> <p>We act as data controller in respect of the personal information that we process. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this information notice.</p> <p>If you have any questions about this privacy notice or how we handle your personal information, please contact <a href="mailto:dataprotection@rathbones.com">dataprotection@rathbones.com</a></p>
<b>B.</b>	<b>About this information notice</b>
	<p>This notice applies to current employees and those who are contractors. It also applies to former employees where we still hold data. This notice does not form part of any contract of employment.</p> <p>It is important that you read this notice, and any other information notice that we may subsequently provide to you, so that you are aware of how and why we are using such information.</p> <p>If you have any questions about how we collect, store, or use your information, or you would like to update the information we hold about you, you may contact your local HR department by e-mail <a href="mailto:PeopleSupport@rathbones.com">PeopleSupport@rathbones.com</a>.</p> <p>This information notice was last updated in January 2024. We may update this notice at any time.</p>
<b>C.</b>	<b>What is the purpose of this information notice?</b>
	<p>This information notice tells you what personal information we collect, and why we need it, how we use it and what protections are in place to keep your personal information secure. It also sets out your rights in relation to your personal data.</p> <p>This information notice applies to Rathbone's employees. The type of personal information we collect about you – and the personal information we obtain from third parties - depends to some extent on your circumstances, your role at Rathbones and our legal obligations.</p>
<b>2. The data protection principles</b>	
<b>A.</b>	<b>The seven principles</b>

	<p>We will comply with data protection laws - these say that the personal information we hold about you must be:</p> <ol style="list-style-type: none"> <li>1. Used lawfully, fairly and in a transparent way</li> <li>2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes</li> <li>3. Relevant to the purposes we have told you about and limited only to those purposes.</li> <li>4. Accurate and kept up to date</li> <li>5. Kept only as long as necessary for the purposes we have told you about</li> <li>6. Kept securely.</li> <li>7. Held in a responsible way and Rathbones must have appropriate measures and records in place to be able to demonstrate compliance with the data protection principles.</li> </ol>
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### 3. What personal information do we hold about you?

A.	<b>What is 'personal information', or 'personal data'?</b>
	<p>Your 'personal information' or 'personal data' means any information about you from which you can be identified - either by reference to an identifier (for example your name, location data or online identifier (IP address) or from factors specific to your physical, cultural, or social identity.</p> <p>It does not include data where the identity has been removed (such as anonymous data or data where the identity of the individual has been irretrievably removed).</p>
	<p>There are 'special categories' of more sensitive personal data (such as information about racial/ ethnic origin, sexual orientation, political opinions, religious/ philosophical beliefs, trade union membership, biometric or genetic data and health data which require a higher level of protection.) Although criminal convictions etc are not a 'special category', we have included these with that category of information as they are treated in the same way.</p>
B.	<b>What personal information do we process?</b>
	<p>The personal information about you that we may collect, store and use is listed in the table below. Note that the type of personal information we collect about you will depend to some extent on your circumstances, your role, and our legal obligations.</p>

Personal information processed	
<b>Name &amp; contact details</b>	<p>Name &amp; Title Contact details – work Contact details - personal</p>
<b>Other personal details</b>	<p>Date of birth Gender Marital status Dependants Next of kin and emergency contact information</p>

<b>Recruitment information</b>	Right to work documentation (Work visa / Passport / National ID Card) Driving license References Employment records (including previous job titles, work history, working hours, training records and professional memberships) Salary & benefits history Other information included in a CV or covering letter or as part of the application process
<b>Financial information</b>	Bank account details Payroll records Tax status information National Insurance number
<b>Remuneration &amp; benefits</b>	Salary Pension Benefits Annual leave
<b>Current employment terms and employment records</b>	Start date Job title Workplace Working hours Attendance records SSP records Holiday and leave records Performance, disciplinary & grievance records Education & training records Professional memberships
<b>Images &amp; recordings</b>	Photographs Information about your IT & communications systems Call recordings between colleagues and/or clients when subject to the Telephone Recording Policy
<b>Other</b>	IP addresses CCTV footage within some office locations

<b>C.</b>	<b>What 'special category' personal information do we process?</b>
	<p>We may also collect, store and use 'special categories' of more sensitive personal information, including:</p> <ul style="list-style-type: none"> <li>• Information about your race or ethnicity, religious beliefs, sexual orientation, and political opinions</li> <li>• Information about your health, including any medical condition, health, and sickness records</li> </ul> <p>Trade union membership information Information about criminal convictions and offences</p>
<b>D.</b>	<b>Monitoring of Communications</b>
	<p>As a matter of course, Rathbones records and monitors the use of company communications equipment by its employees and other staff. This means that when you speak with a client (or another member of staff) by telephone, your calls may be recorded and/or monitored. In the same way, the content of email communications may be monitored for the following purposes:</p> <ul style="list-style-type: none"> <li>• for training purposes, allowing us to improve the quality of our communications.</li> <li>• as evidence of client instructions and to ensure that we are providing a high quality service;</li> </ul>

	<ul style="list-style-type: none"> <li>• in pursuit of our legal obligations or in compliance with regulatory rules or requirements.</li> <li>• for the establishment, exercise or defence of disputes or legal claims (where relevant); and</li> <li>• for preventing or detecting crime (including fraud).</li> </ul> <p>For further information, please refer to the Group Telephone recording policy.</p>
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#### **4. Where do we collect your personal information from?**

<b>A.</b>	<b>Where does your personal information come from?</b>
	<p>We collect your personal information:</p> <ul style="list-style-type: none"> <li>• From you: we typically collect personal information about employees through the application and recruitment process directly from candidates.</li> <li>• From third parties: we may sometimes collect additional information from the following third parties: <ul style="list-style-type: none"> <li>○ Employment agency (Personal Data)</li> <li>○ Sterling Check (Background and Credit check) (Personal and Special Category Data)</li> <li>○ HM Revenue &amp; Customs (Personal Data)</li> <li>○ Referees – former employers (Personal Data)</li> <li>○ Regulatory authority (Personal Data)</li> <li>○ Medical Questionnaire, Occupational Health Report (Personal Sensitive Data)</li> </ul> </li> <li>• In the course of job-related activities: throughout the period you are working for us, we collect additional personal information about you.</li> </ul>

#### **5. How will we use your personal information?**

<b>A.</b>	<b>What is the legal basis for using your personal information?</b>
	<p>We will only use your personal information when the law allows us to. Most commonly, we will use your personal information where it is necessary:</p> <ul style="list-style-type: none"> <li>○ to perform the contract, we have entered into with you</li> <li>○ to comply with a legal obligation</li> <li>○ for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests</li> </ul> <p>We may also use your personal information in the following circumstances, but this is likely to be rare:</p> <ul style="list-style-type: none"> <li>○ with your specific written consent</li> <li>○ where we need to protect your interests (or someone else's interests)</li> <li>○ where it is needed in the public interest [or for official purposes]</li> </ul>
<b>B.</b>	<b>What is the purpose for processing your personal information?</b>
	We need all the categories of information listed above primarily to allow us to perform

	<p>our contract with you and to enable us to comply with legal obligations.</p> <p>The situations in which we will process your personal information are listed in the table below - we have indicated:</p> <ul style="list-style-type: none"> <li>○ the purpose or purposes for which we are processing your personal information, or we will process it</li> <li>○ the categories of data involved</li> <li>○ the legal basis for processing your personal information (for example it is necessary for the performance of your employment contract)</li> </ul> <p>Some of the grounds for processing will overlap, and in some cases, there will be several grounds which justify our use of your personal information.</p>
<b>C.</b>	<b>Change of purpose</b>
	<p>We will only use your personal information for the purposes for which we collected it - unless we reasonably consider that we need to use it for another purpose that is compatible with the original purpose.</p> <p>If we need to use your personal information for an unrelated purpose, we will notify you and explain the basis upon which that is necessary.</p> <p>Where required or permitted by law, we may process your personal information without your knowledge or consent, in compliance with the above rules.</p>
<b>D.</b>	<b>What Is the legal basis for processing your 'special category' personal information?</b>
	<p>We may process special categories of personal information in the following situations:</p> <ol style="list-style-type: none"> <li>1. With your explicit written consent, but this will only be in limited circumstances</li> <li>2. Where we need to do so to fulfil our legal obligations and in line with our Data Protection Policy and Appropriate Policy Document.</li> <li>3. Where it is in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and where it is in line with our Data Protection Policy and Appropriate Policy Document.</li> <li>4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.</li> </ol> <p>We may also process special categories of personal information, although this will be less common, where it is necessary in relation to legal claims or to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.</p> <p>We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.</p>
<b>E.</b>	<b>What is the purpose for processing 'special category' personal information? -</b>
	<p>'Special categories' of particularly sensitive personal information attract higher levels of protection, and we must have further justification for collecting, storing, and using this type of personal information. We therefore only process such data in accordance with the below.</p>

Information processed	Purpose of processing
Information relating to absence - this may include sickness absence or family related leave	<ul style="list-style-type: none"> <li>to comply with employment and other laws</li> </ul>
Information about your physical or mental health, or disability status	<ul style="list-style-type: none"> <li>to ensure your health and safety in the workplace</li> <li>to assess your fitness to work</li> <li>to provide appropriate workplace adjustments</li> <li>to monitor and manage sickness absence</li> <li>to administer benefits</li> </ul>
Information about your race or national or ethnic origin, religious, philosophical, or moral beliefs, your gender, or sexual orientation or your socio-economic background.	<ul style="list-style-type: none"> <li>to ensure meaningful equal opportunity monitoring and reporting</li> <li>Right to Work legislation</li> <li>Please refer to the Appropriate Policy Document for further information.</li> </ul>

<b>F.</b>	<b>Information about criminal convictions</b>
	We do not hold information about criminal convictions, for longer than 6 months.

	<p>We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to act in accordance with our regulatory and other legal obligations and is in accordance with our data protection policy.</p> <p>Although this is only in exceptional circumstances, we may also use information relating to criminal convictions where it is necessary in relation to legal claims or to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.</p> <p>We may also process such information about members or former members in the course of legitimate business activities with the appropriate safeguards.</p> <p>Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us. We will use information about criminal convictions and offences in the following ways:</p> <ul style="list-style-type: none"> <li>• To assess Fitness &amp; Propriety</li> </ul> <p>We are allowed to use your personal information in this way to carry out the following obligations:</p> <ul style="list-style-type: none"> <li>○ to perform the contract we have entered into with you</li> <li>○ to comply with a legal obligation</li> </ul>
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## 6. Do we need your consent?

<b>A.</b>	<b>When might we need your consent?</b>
	<p>Consent must be freely given, specific, informed and an unambiguous indication of your wishes.</p> <p>We do not need your consent if we use special categories of your personal information in accordance with our written data protection policy to carry out our legal obligations or exercise specific rights in the field of employment law.</p> <p>However, there may be limited circumstances where we will approach you to obtain your written consent to allow us to process certain particularly sensitive data. In addition, there may be limited circumstances where we will need to approach you to obtain your written consent to allow us to process certain personal data, where we are not already permitted to process it for the performance of your contract or to comply with legal obligations for example, but there is good reason for processing such data.</p> <p>If so, we will provide you with full details of the information that we require and the reason we need it, so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with us that you agree to any request for consent from us.</p>
<b>B.</b>	<b>Your right to withdraw consent</b>

	<p>If you do provide your consent to the collection, processing, and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for that purpose unless we have another legitimate basis for doing so in law.</p> <p>If you wish to withdraw your consent, please contact <a href="mailto:dataprotection@rathbones.com">dataprotection@rathbones.com</a>.</p>
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## **7. Do you have to provide personal information?**

<b>A.</b>	<b>What are the consequences of failing to provide information?</b>
	<p>If you fail to provide certain information requested:</p> <ul style="list-style-type: none"> <li>• we may not be able to perform the contract we have entered into with you (e.g., paying your salary) or</li> <li>• we may be prevented from complying with our legal obligations to you (e.g., to ensure the health and safety of our employees) [as well as our regulatory obligations]</li> </ul>

## **8. What steps do we take to protect your data?**

<b>A.</b>	<b>How do we secure your data?</b>
	<p>We have security measures in place to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, or inappropriately altered or disclosed. In addition, we limit access to your personal information to those who need to process that information for business reasons. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.</p> <p>Details of these security measures may be obtained from our DPM Jade Williams.</p> <p>We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach as appropriate and in accordance with our legal obligations.</p>

## **9. Who do we share your personal information with?**

<b>A.</b>	<b>What is the legal basis for sharing your personal information with third parties?</b>
	<p>We may share your data with third parties, including third party service providers and other entities in the group. Where we share your data, we require third parties to respect the security of your data and to treat it in accordance with the law.</p> <p>We may share your personal information with third parties in the following situations:</p> <ul style="list-style-type: none"> <li>○ where required by law</li> <li>where it is necessary to administer the working relationship with you, or</li> <li>○ where we have another legitimate interest in doing so.</li> </ul>

<b>B.</b>	<b>What protections are in place?</b>
	<p>The terms of our contracts with third party contractors include obligations on them in relation to what personal information they can process and what they can do with that information. All our third-party service providers, professional advisers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies.</p> <p>We do not permit our third-party service providers to use your personal data for their own purposes – they may only process your personal data for specified purposes and in accordance with our instructions.</p>
<b>C.</b>	<b>Which third parties process your personal information?</b>
	<p>The following third parties process your personal information, or may process it where relevant, for the purposes stated here:</p> <ul style="list-style-type: none"> <li>• Other companies within the Group [as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data]</li> <li>• Agents, contractors that provide services to us [payroll, pension administration, benefits provision and administration, IT services]</li> <li>• Background and Financial Check provider – i.e., Credence</li> <li>• HMRC</li> <li>• UK Visas and Immigration</li> <li>• Regulatory Authority</li> <li>• Professional Advisors</li> <li>• Medical and Occupational Health</li> </ul>

	<ul style="list-style-type: none"> <li>• We may share your personal information with other third parties, e.g., in the context of the possible sale/restructuring of the business</li> </ul> <p>We may also need to share your personal information to otherwise comply with the law.</p>
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#### **10. How long do we use your personal information for?**

<b>A</b>	<b>Data retention</b>
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	<p>We will retain your personal information only for as long as is reasonably necessary to fulfil the purposes for which we collect your personal information. These purposes are listed at section [5] of this information notice and include for the purposes of satisfying any legal, accounting, or reporting requirements.</p> <p>Details of retention periods for different aspects of your personal information are available in our data retention policy which is available via SharePoint:</p> <p><a href="#">Group Record Retention Destruction Policy v2.1.pdf (sharepoint.com)</a></p> <p>These retention periods take account of the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, as well as any legal requirements. Please note that if you work in Jersey, some differing legal retention periods may apply.</p> <p>In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.</p> <p>When you are no longer an employee, we will retain and subsequently securely destroy your personal information in accordance with our data retention policy.</p>
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#### 11. What are your rights?

A.	<b>Inform us of changes</b>
	Please ensure you inform us if your personal information changes while you are an employee with Rathbones Group Plc as it is important that the personal information, we hold about you is accurate and current.
B.	<b>Your rights in relation to your personal data</b>
	<p>You have certain rights in relation to the personal information that we hold about you, subject to certain exemptions (e.g., public interest and Rathbone]'s interests).</p> <p>Those rights include the right to request:</p> <ul style="list-style-type: none"> <li>• access to your personal information (commonly known as a 'data subject access request') - to receive a copy of the personal information we hold about you and to establish we are processing it lawfully</li> <li>• the correction of your personal information - to have any incomplete or inaccurate information about you corrected</li> <li>• the erasure of your personal data - to delete or remove your personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below)</li> <li>• to restrict or object to the processing of your personal data - to suspend the</li> </ul>

	<p>processing of personal information about you, e.g., if you want us to establish its accuracy or the reason for processing it</p> <ul style="list-style-type: none"> <li>• to transfer your personal information to another party</li> </ul> <p>If you want to make one of these requests, please contact the DPM Jade Williams in writing. You do not have to pay to exercise these rights (although see below for data subject access requests).</p> <p>In order to protect your personal data, to ensure it is not disclosed to a person who has no right to receive it, we may request specific information from you to help us confirm your identity and ensure your right to exercise any of your rights.</p>
C.	<b>Data subject access requests</b>
	<p>There is generally no fee to access the personal information that we hold about you, however we may charge a reasonable fee if your request is clearly unfounded or excessive or if you request further copies of the same information.</p> <p>Alternatively, we may refuse to comply with a request that is unfounded or excessive.</p>
D.	<b>Complaints</b>
	<p>You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues or The Office of the Information Commissioner (OIC) in Jersey.</p>