

RATHBONES

PRIVACY

Under data protection law, organisations are responsible for ensuring your personal information is protected and you have certain rights available to you.

It is one of our fundamental responsibilities as an investment and wealth management business to ensure that we protect the information provided to us by our clients, prospective clients, and our website visitors.

About this Notice

This privacy notice applies if you are a past, prospective or current client or an intermediary or client of an intermediary of the following:

- Rathbone Investment Management Limited (a UK registered company, registered in England with company number 01448919);
- Rathbone Investment Management International Limited (a Jersey registered company with company number 50503)

This privacy notice explains how Rathbone Investment Management Limited and Rathbone Investment Management International Limited (“we”, “our”, “us”) collects, uses and shares your personal data, and your rights in relation to the personal data we hold (“you”, “your”).

For the purposes of data protection law, the companies noted above are separate data controllers of your personal data and are responsible for ensuring that your personal data is used in compliance with data protection law.

How do we collect information about you?

We collect your personal information in a number of ways:

- this begins with any interactions we have before you become a client. Such examples include when you communicate with us over the phone, by letter, via email or the website, rathbones.com;
- from information you provide to us when you interact with us before becoming a client, for example when you contact us about our services;
- when you ask us to provide services to you and subsequently provide us with the necessary information;
- from third parties, for example when we carry out our routine checks on you before we can accept you as a client;
- where you provide us with personal data relating to others (e.g. your family members), we understand that you either have their consent or are entitled to provide this information to us for subsequent use;
- in the other ways you interact with us during your time with us, for some of the reasons set out below; and
- by using cookies for security and user experience purposes and to monitor the services you use and how you use them

Please see our Cookie policy for further information regarding our use of cookies.

What information do we collect about you?

We collect the following types of personal data about you:

- your name, and contact information such as address, email address and telephone number;

- your date of birth, national insurance number (or other tax identification number) and due diligence information;
- Technical data including internet protocol (IP) address, your login data , browser type and version and time zone setting;
- financial information, employment history, nationality and dependents.

From time to time, it may be necessary for Rathbones to process certain "special category" Personal Data relating to you, in order to provide the services that you request. This may include Personal Data revealing your racial or ethnic origin, sexual orientation and/or any health conditions you have, as well as other sensitive Personal Data relating to the commission (or alleged commission) by you of a criminal offence.

Where necessary we will obtain your explicit consent to collect and process this information. We will ensure you are provided with clear information as to why this information is required and the purposes for which it will be used.

On what basis do we use your personal data?

We collect and use your personal data to provide our services and to ensure we meet our regulatory requirements. Your data may also be used for marketing purposes, so that we can inform you about our products and services.

Performing a contract

We may process your personal data because it is necessary for the performance of a contract with you or in order to take steps at your request prior to entering into a contract. Under these circumstances, we use your personal data for the following:

- to interact with you before you become a client, for example when you express your interest in our services (for example, to answer enquiries about our services);
- to gain a more complete understanding of your personal finances and investment objectives before you become a client so that we may provide the most suitable service(s) to you;
- once you have become a client, to provide you with the services as set out in our Terms of Business or any other contractual document (including, but not limited to, the provision of our online service in accordance with our Online Terms and including, where applicable, the processing of your sensitive personal data, for example where your health and/or medical details are relevant to the calculation of annuities, pensions or other benefits);
- to deal with any concerns or feedback you may have; and
- for any other purpose for which you provide us with your personal data.

Legitimate interests

We may also process your personal data because it is necessary for our or a third party's (this is a person or organisation external to Rathbones) legitimate interests. Our "legitimate interests" include our commercial interests in operating our business (and the business of the Rathbone Group more generally) in a client focused, efficient and sustainable manner,

in accordance with all applicable legal and regulatory requirements. In this respect, we may use your personal data for the following:

- to monitor and evaluate the performance and effectiveness of our services, including by training our staff or monitoring their performance, and for the monitoring of communications, as set out in the section below;

- outsourcing selected ‘back office’ functions to third parties (for example, vendors of hosted software solutions or cloud storage providers) for the purposes of efficient, fast and secure access to information across the Rathbone Group;
- to seek advice on our rights and obligations, such as where we require our own legal advice;
- as part of a reorganisation, sale or negotiations for sale of all or part of our business;
- to follow up with you after you request information to see if we can provide any further assistance and for more general marketing purposes, including to inform you about events, send you our economic commentary and general interest articles, and to keep you informed (by letter, telephone, email and other electronic means) of services from us and other Rathbone Group members, which we think may be of interest to you. If you do not wish to receive such information, please let us know now or at any time in the future, and your details will be removed from our mailing list(s). We will not provide your personal data (or sensitive personal data) to organisations other than members of the Rathbone Group to use for their own marketing purposes without your consent.

Compliance with our legal obligations

We may also process your personal data to comply with our legal obligations. In this respect, we may use your personal data for the following:

- to confirm your identity, carry out background checks and to confirm your credit history for anti-money laundering and ‘know your client’ purposes (including as part of our checks to prevent fraud and other crimes, or checks in advance of us providing a loan or any kind of credit to you). Such checks may be carried out before we begin to provide services to you, and we reserve the right to use your information to carry out further checks at any time while you are a client of ours.

Please note that we may use credit reference agencies to do this, which may record that a search has been made and share the fact of the search and results (including the information that we provide) with other organisations. Any use of your personal information by such agencies will be subject to those agencies’ own privacy policies and terms of use, unless they are acting only on our behalf when processing your personal information:

- to fulfil our obligations under any reporting agreement entered into with any tax authority or revenue service(s) from time to time, including but not limited to HMRC and the US Internal Revenue Service (IRS), as is necessary for compliance with our legal obligations;
- in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities; or
- to meet our other compliance and regulatory obligations, including in order to comply with any requirement of any applicable statute, regulation, regulatory rule and good practice requirement to which we are subject.

Other purposes

We may also process your personal data where:

- it is necessary to protect your or another person’s vital interests;
- it is necessary for the establishment, exercise or defence of legal claims (for example, to protect and defend our rights or property, and/or the rights or property of our clients, or of third parties, including where applicable relying on recordings or monitored observations from communications with you);
- we have your specific or, where necessary, explicit consent to do so.

Monitoring of communications

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 your investment manager (or

another member of our 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:

- for training purposes, allowing us to improve the quality of our communications;
- as evidence of your instructions and to ensure that we are providing a high quality service to you;
- in pursuit of our legal obligations or in compliance with regulatory rules or requirements;
- for the establishment, exercise or defence of disputes or legal claims (where relevant); and
- for preventing or detecting crime (including fraud).

Disclosure of your information (when it may be shared with others)

In addition to sharing your personal data with other members of the Rathbone Group, we may also disclose your personal data:

- to any other organisations that we may engage to perform, or assist in the performance of, our services or to advise us, provided that they will only be given access to your personal data (including your sensitive personal data, where applicable) to perform such assistance, services or advice and not for other purposes. We shall aim to ensure that any such organisation undertakes to adopt appropriate security measures in respect of your personal data;
- to counterparties where disclosure is reasonably necessary for the purpose of effecting transactions in connection with our Terms of Business or any other contractual document or for establishing a dealing relationship with a view to such transactions;
- where we have your permission to reveal the information;
- to any ‘connected person’ as set out in our Terms of Business or any other contractual document, unless you expressly instruct us in writing to do otherwise;
- If you are a joint client, to the other client named in any relevant Terms of Business or any other contractual document;
- as part of a reorganisation, sale or negotiations for sale of all or part of our business (subject to appropriate security and confidentiality measures);
- in circumstances in which we are required or authorised by law (including, but not limited to, data protection legislation), court order, regulatory or governmental authorities to disclose your personal data; or
- where you are a beneficiary or policyholder in respect of a portfolio, fund or account which is legally owned by a third-party provider, to such third-party provider.
- We will not lend or sell you information to third parties.

Your personal information may need to be shared with our service providers, which may involve transferring it to countries outside the European Economic Area (EEA). Where we do so, we will ensure that we do this in accordance with current data protection legislation by only transferring your data to jurisdictions in respect of which there is a European Commission adequacy decision or, where this is not the case, by using model clauses which have been approved by the European Commission or where the recipient is a certified member of the EU- US Privacy Shield scheme.

How long do we keep this information?

We will retain your personal data for as long as we are providing you with the services referred to in any relevant Terms of Business or any other contractual document, and for as long as permitted or required for legal, regulatory, fraud prevention and our legitimate business purposes after the closure of your

account, if the investment, advisory or banking relationship between you and us has terminated, or if your application for a particular service or services is declined or abandoned.

What are your data protection rights?

Under data protection law you have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you (this is commonly known as a 'Data Subject Access Request' (DSAR));
- to require that we cease processing your personal data if the processing is causing you damage or distress;
- to require us not to send you marketing communications;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us to erase your personal data;
- to require us to restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller; and
- to require us to comply with your objection, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

If you have given your consent and you wish to withdraw it, please contact us using the contact details set out below. Please note that where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.

When you contact us to exercise any of the above rights, we may ask you to provide some additional information in order to verify your identity, such as your name, your address and proof of identity.

Contact us

If you have any questions or concerns you would like to raise about how we process your personal data, you can contact our Data Protection Team at:

Email: dataprotection@rathbones.com

Post: Data Protection Team, Rathbone Investment Management Limited, Port of Liverpool Building, Pier Head, Liverpool L3 1NW.

Jersey: Data Protection, Rathbone Investment Management International Limited, 26 Esplanade, St Helier, Jersey JE1 2RB.

Alternatively, if you would like to contact your Data Protection Authority, please use the contact details below:

United Kingdom: Information Commissioner's Office

Jersey: Jersey Office of the Information Commissioner

Last updated: November 2023

GDPR

For our clients overseas, we have appointed a representative which can accept communications on behalf of Rathbones, in relation to personal data processing activities falling within the scope of the GDPR. If you wish to contact them, their details are as follows:

GDPR Representative

Bird & Bird GDPR Representative Services SRL Avenue Louise 235

1050 Bruxelles Belgium

EURepresentative.Rathbones@twobirds.com

Key contact:

Vincent Rezzouk-Hammachi