# Protecting your personal data

### How does data protection benefit you?

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

You have a legal right to access the personal information we hold about you. You can request your information be deleted or updated, and you can ask us to correct or delete any errors. You also have the right to ask us to restrict our processing and, where that processing is based on your consent, you are able to withdraw that consent. You can ask us not to send you any direct marketing communications, meaning advertising material specifically aimed at you.

We will consider any objection you may have, relating to your particular circumstances, to any of our processing activities. You may request a copy of the personal information which you provided to us, that we hold about you, in a format that is suitable for sending to another organisation, such as another financial institution.

Your legal rights are not unqualified and, in certain circumstances, your request may be refused. You have the right to refer such instances to the Information Commissioner's Office (ICO).

A full description of your personal information rights can be found in our privacy notice at rathbones. com/privacy or you may request a printed copy from our Data Protection Team by contacting: dataprotection@rathbones.com

## How do we use your personal information?

We collect and use your personal information in a number of ways. This begins with any interactions we have with you before you become a client and after joining Rathbones. We process this information primarily to fulfil our contractual services with you, and to comply with our legal obligations. By processing, we mean obtaining, recording, holding and using your personal information.

For example, we may process your personal information to gain a complete understanding of your finances and investment objectives so that we may provide the most suitable services to you. We may carry out routine anti-money laundering checks using your personal information to meet our legal obligations and obtain relevant information from third parties before we accept you as a client. Furthermore it may be necessary for us to use a third party to ensure we continue to provide an efficient service to you as our client.

If you are a private client, we may also collect more sensitive personal data from you such as information concerning your health. Where necessary we will obtain your explicit consent to process this information and the purposes for which it will be used.

You may provide us with personal information about other people (for example, members of your family or other parties connected to a trust, company or charity if you are joining Rathbones as part of an entity). In these instances, we ask that you have their authority to provide this information to us.

As we operate globally, it is possible that your personal information will be transmitted to and processed in countries outside of the UK or the European Economic Area (EEA) that may not provide the same level of data protection. Where this happens, we put in place adequate measures as necessary to ensure that your information is suitably protected when it is transferred outside of the UK or the EEA.

#### How do we share and store your personal data?

Rathbones Investment Management (as data controller) may share your personal information with other Rathbones Group companies and, where it is relevant to services provided to you, it might be made available to third parties. In addition, we may occasionally be required by law, tax or other regulatory authorities to report certain personal information.

We will keep your personal information for as long as we provide you with the services referred to in any Terms of Business or other contract. We may sometimes be obliged to keep your data for longer for legal, regulatory or other governance reasons.

Our privacy notice is available at rathbones.com/privacy or can be obtained from our Data Protection Team using the contact details below.

#### Contact us

If you have any questions about data protection or your personal information, please contact our Data Protection Team using the following address or email address:

Rathbones Investment Management Limited Port of Liverpool Building Pier Head, Liverpool L3 1NW

dataprotection@rathbones.com

To comply with Article 27 of the General Data Protection Regulation (GDPR), 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:

Vincent Rezzouk-Hammachi Bird & Bird GDPR Representative Services SRL Avenue Louise 235 1050 Bruxelles Belgium

EUR epresentative. Rathbones@two birds.com