

Introduction

This notice (Notice) describes how Rathbone Brothers Plc handles and protects data to which Rathbone Brothers Plc is provided access in connection with the recruiting process.

By making available your Candidate Data, as defined below, you confirm that:

- You have reviewed this Notice and agree that Rathbone Brothers Plc may process your Candidate Data in accordance with this Notice;
- You have provided any notices and obtained any consents needed to provide information concerning others (e.g., information about employment references) Rathbone Brothers Plc will process Candidate Data in accordance with this Notice, unless in conflict with requirements of applicable law, in which case applicable law will prevail.

Your consent to the provisions of this Notice is required in order to submit or make available Candidate Data. If you decline to submit or make available your Candidate Data, it may affect your ability to apply for or receive an offer of employment.

This Notice does not form part of any contract of employment offered to candidates hired by Rathbone Brothers Plc.

Definitions

Candidate Data is identifiable information that an individual makes available to Rathbone Brothers Plc in connection with the recruiting process. Rathbone Brothers Plc may collect Candidate Data directly from a candidate or from third parties, for example, in connection with a background or employment check or employment reference, subject to your consent where required by law. Candidate Data may include a variety of information, such as candidate status, work history/job data, education, compensation, employer feedback, questionnaire results, contact information, previous addresses or names, additional information provided by the candidate (e.g., a cover letter), driver's license number as required for certain positions, references, and criminal history where permitted by law.

Processing refers to any action performed on Candidate Data, such as collecting, recording, organizing, storing, transferring, modifying, using, disclosing, or deleting.

Sensitive Candidate Data is Candidate Data concerning nationality or citizenship, race or ethnic origin, or criminal history. Rathbone Brothers Plc does not request or consider information concerning religion, sex life or political opinions in connection with recruiting.

Collection

You may use various electronic and paper methods to submit Candidate Data to Rathbone Brothers Plc. You agree that, in addition to collecting Candidate Data directly from you, Rathbone brothers Plc may collect Candidate Data from third parties, for example, from recruiters, in connection with a background or employment check or an employment reference (subject to your consent where required by law) or, to the extent permitted by law, from a recruiter or other web site.

Processing and Retention

Rathbone Brothers Plc processes Candidate Data for legitimate human resources and business management purposes. These include identifying and evaluating candidates for Rathbone Brothers Plc positions; record-keeping related to hiring processes; analysing the hiring

process and outcomes; and conducting background checks, where permitted by law. In addition, Candidate Data may be used to comply with Rathbone Brothers Plc's legal, regulatory and corporate governance requirements. If a candidate is hired, Candidate Data may be used in connection with his/her employment consistent with Rathbone Brothers Plc's employment data protection policies.

Sharing with Third Parties

Rathbone Brothers Plc may transfer Candidate Data to external third-party providers performing certain services for Rathbone Brothers Plc. Such third-party providers have access to Candidate Data solely for the purposes of performing the services specified in the applicable service contract, and Rathbone Brothers Plc requires the providers to undertake security measures consistent with the protections specified in this Notice.

Rathbone Brothers Plc may be required to disclose certain Candidate Data to other third parties (1) as required by law; (2) to protect Rathbone Brothers Plc's legal rights to the extent authorized or permitted by law; or (3) in an emergency where the health or safety of a candidate or other individual may be endangered. In addition, in the event of a re-organization, merger, sale, joint venture, assignment, or other transfer or disposition of all or any portion of Rathbone Brothers Plc's business, Rathbone Brothers Plc may transfer Candidate Data to successor entities or parties.

Sensitive Candidate Data

Rathbone Brothers Plc may perform background and criminal checks where permitted by law, and may process other Sensitive Candidate Data, such as citizenship or nationality information or health information, when relevant for a position and permitted by law. If Rathbone Brothers Plc intends to collect Sensitive Personal Data from third parties, you will be provided notice and the opportunity to consent. If you have a disability and would like Rathbone Brothers Plc to consider an accommodation, you may provide that information during the recruiting process. To the extent you make Sensitive Candidate Data available to Rathbone Brothers Plc, you consent to Rathbone Brothers Plc processing such Data in accordance with this Notice.

Security and Confidentiality

Rathbone Brothers Plc limits access to internal systems that hold Candidate Data to individuals who need access for a legitimate business purpose.

Candidate Rights

You may exercise the following rights in relation to your Candidate Data:

Access, Correction and Deletion: Rathbone Brothers Plc will provide you access to your Candidate Data that Rathbone Brothers Plc holds to the extent required by law in your home country, regardless of the location of the Candidate Data processing. You may request correction or deletion of that Candidate Data, except where retention is required by your contractual relationship with Rathbone Brothers Plc, in the context of a legal dispute, or as otherwise required by law. If access, correction or deletion is denied, the reason for the denial will be communicated to you.

Automated Decisions: Rathbone Brothers Plc generally does not make recruiting or hiring decisions based solely on automated decision-making within the meaning of the EU Data Protection Directive. In the event that Rathbone Brothers Plc relies solely on automated decision-making that could have a significant impact on you, Rathbone Brothers Plc will

provide you an opportunity to express your views and will provide any other safeguards required by law.

Inquiries, Complaints and Objections: You may withdraw consent to the processing of your Candidate Data or submit inquiries, complaints and/or objections to the processing of your Candidate Data by sending a request in writing to our Data Protection Compliance Officer: Jade.Williams@rathbones.com

The processes described in this Notice supplement any other remedies and dispute resolution processes provided by Rathbone Brothers Plc and/or available under applicable law.

Changes to this Notice

Rathbone Brothers Plc reserves the right to modify this Notice by posting changes to relevant Rathbone Brothers Plc websites. If you submit additional Candidate Data or request to be considered for a Rathbone Brothers Plc position following the effective date of a modified Notice, your Candidate Data will be handled in accordance with the Notice in effect at that time.