

Regulatory notice from Ruffer S.A.



General Data Protection Regulation (GDPR)

What is GDPR?

It's a law affecting all industry sectors, which addresses what we can and cannot do with your personal data. 'Personal data' is information that identifies individuals directly or from which individuals can be identified indirectly. We are the 'data controller' in relation to your personal data that we hold, because we control the storage and use of that personal data.

Why are you telling me about it?

One of the requirements of GDPR is that we tell you how we process your personal data. 'Processing' includes obtaining, recording or storing personal data and carrying out any tasks using the personal data. This notice also describes your data protection rights, including a right to object to some of the processing which we carry out.

For what purposes do you process my personal data?

We process your personal data for a number of different purposes–

- for setting up your account at Ruffer
- for managing your assets
- for reporting to you on the services we provide
- for verifying your identity and carrying out regulatory checks
- for undertaking regulatory reporting and processing tax reclaims
- for complying with various laws and regulations to which we are subject
- for understanding you and your circumstances better so that we can provide a better service to you

- for inviting you to meetings and other events which we think may be of interest to you and
- for obtaining information in relation to your use of our website.

What are the lawful grounds on which you rely to process my personal data?

These are as follows–

- the processing is necessary for the performance of our contract with you or in order to take steps at your request prior to entering into a contract with you
- the processing is necessary for compliance with a legal obligation
- the processing is necessary for the purpose of our legitimate interests or
- you consent to the processing.

'Legitimate interests' is a heading that covers a number of different reasons why we might need to process your personal data which may not be covered by other headings, such as

- to comply with regulation or regulatory guidance
- to prevent fraud or financial crime
- to provide a better service to you
- to build our relationship with you by inviting you to events in which we think you will be interested
- to transfer personal data between group entities for internal administrative purposes or
- for the purposes of network or information security.

Further information is available in the privacy notice on our website at ruffer.co.uk/privacy on which of these grounds and legitimate interests apply to each of the purposes for which we process your personal data.

Can I withdraw my 'consent'?

Where we rely on your consent to process your personal data, you are able to withdraw such consent at any time. To withdraw your consent, please inform your usual Ruffer contact.

What rights do I have over my personal data?

GDPR gives you a number of rights over your data, subject to certain criteria being met. These are–

- right of access – a right to obtain a copy of the data we hold about you as well as some supplementary information on that data
- right to rectification – a right to require us to correct mistakes in the data we hold about you
- right to data portability – a right to require us to transfer personal data which you have provided to us to you or to another firm
- right to object – a right to object to the processing of your data on the basis of our legitimate interests and/or to the processing of your data for direct marketing purposes
- right to erasure – a right to require us to erase personal data that we hold about you and
- right to restriction – a right to require us to restrict our processing of your personal data.

If you wish to exercise any of these rights please get in touch with your usual Ruffer contact who will provide you with further information regarding how to exercise these rights.

To whom might you pass my personal data?

We will pass your data to Ruffer LLP in order that it can perform the functions delegated to it by us in relation to our clients. We might pass your personal data to third parties on whose services we rely in order to be able to set up your account or provide services to you. These include: the custodians we use, those with whom we transact including brokers, banks and market counterparties, the registrars of individual investments, regulatory or tax authorities, professional advisers such as our auditors or lawyers, administrators and service and software suppliers.

Do I have to provide my personal data to you?

It is a regulatory requirement that we collect certain personal data about you in order for us to provide services to you. If you fail to provide certain personal data when requested we may not be able to provide services to you.

Do you ever pass my personal data outside the EU?

Our group company in Hong Kong may have access to your personal data through the use of common applications and systems. We have entered into a set of standard contractual clauses with our group company to provide safeguards around the processing of your personal data. A copy of these clauses is available on request from your usual contact at Ruffer.

Third parties whose services we use may also transfer your personal data to other third parties who in turn they use to provide their services to us. We ask such third parties to put in place appropriate safeguards where this involves a transfer of personal data outside the EU.

How long do you keep my personal data?

We will keep your personal data for as long as you are a client and for a reasonable period of time after that. If you decide not to become a client, then we will keep your personal data for a maximum period of three years after your most recent contact with us. The length of time we keep your personal data will reflect the obligations we have under applicable regulation to store personal data, such as relevant prescription periods and regulatory requirements.

Do you subject my personal data to any automated decision making?

No.

What happens if I want to complain to you about your use of my personal data?

Please send your complaint to the Data Protection Officer of Ruffer LLP, Craig Lindsay-Smith, at the following address

Ruffer LLP

80 Victoria Street

London SW1E 5JL

clindsay-smith@ruffer.co.uk

+44(0)20 7824 0548

You may also contact Craig with regard to all issues related to our processing of your personal data and to the exercise of your rights noted above.

Right to lodge a complaint with a supervisory authority

You have a right to lodge a complaint in relation to our processing of your personal data with a supervisory authority.

In France, you can contact the French supervisory authority: Commission Nationale de l'Informatique et des Libertés, 3 Place de Fontenoy – TSA 80715 – 75334 Paris CEDEX 07. The number of their helpline is +33 1 53 73 22 22.

Who do I contact with further questions about your use of my personal data?

Please get in touch with Craig Lindsay-Smith or your usual contact at Ruffer via email, at the Ruffer address noted above or by telephone on +33 1 88 45 02 54.

Updates to this notice

We may update this notice from time to time to reflect changes in the way we process your personal data or to clarify information we have provided in this notice. We will notify you directly about these changes when we are legally required to do so.