

# Privacy notice from Ruffer S.A.



## Visitors to our website

### Collection of data through our website

We collect personal data through our website for the following purposes

- if you wish to sign up to hear more about Ruffer through one of our publications or events which we host from time to time we will ask you to submit your contact details which we will store to enable us to provide you with the requested materials or invite you to relevant events
- if you are a client of Ruffer or an agent on behalf of a client and use our client portal login we will receive and store your contact information, password and memorable information to verify your identity. The portal provides details of your Ruffer portfolio for you to view online and utilises technology to track which documents have been opened by the user, which Ruffer employs to ensure that clients have received documents that we have a regulatory obligation to provide
- Ruffer uses cookies in order to ensure the smooth functioning and security of our website. For more details about how Ruffer uses cookies please go to [ruffer.co.uk/privacy](http://ruffer.co.uk/privacy)

We also use analytics and firewall technologies which track your website usage but which do not provide us with personal data

- we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns so we can tailor our website to make it more useful. All the information we receive is anonymised and/or aggregated and we do not receive any personally identifiable information.

- we use firewalls with security features enabled, which are managed by a third party provider, to help maintain the security and performance of our website. This service processes IP addresses and blocks suspicious traffic. However neither Ruffer nor our security provider is able to identify individuals based on the IP address information processed alone.

### Recording of telephone calls

We also collect personal data by recording telephone calls made to and from our offices.

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

The legal basis we rely on to process your personal data is that, i) it is necessary for the purpose of our legitimate interests or, ii) regarding the recording of telephone calls, it is required under Article L. 533-10 of the French Monetary and Financial Code.

'Legitimate interests' is a heading that covers a number of different reasons why we might need to process your personal data, such as

- to enable us to provide you with information about Ruffer which you have requested
- to enable us to provide a secure online tool for clients and their agents to view their Ruffer portfolios
- to comply with regulation or regulatory guidance
- to prevent fraud or financial crime
- to ensure the security and smooth functioning of our website and client portal and
- to gain a better understanding of how our website is used so that we can make it better and more useful in the future.

### Do I have to provide my personal data to Ruffer?

Users are generally in control of the personal data they share with us through the website by inputting their details. If you are a client and do not want your personal data to be processed via our client portal then you can obtain up to date valuation information on your portfolio directly from your usual Ruffer contact.

We collect a limited amount of information automatically via the use of cookies and analytics.

For further details on cookies and how to change your browser settings please go to [ruffer.co.uk/privacy](https://ruffer.co.uk/privacy)

### What rights do I have over my personal data?

The General Data Protection Regulation (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
- right to define directives to the processing of your personal data after your death.

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, and whether you are able to exercise these rights. If you are not a Ruffer client then please direct your request to [ruffer@ruffer.co.uk](mailto:ruffer@ruffer.co.uk).

### To whom might you pass my personal data?

We might pass your personal data to third parties who provide us with security, analytics and other web services so that they can provide these services to us.

### Do you ever pass my personal data outside the EU?

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 keep personal data relating to clients for as long as you are a client and for a reasonable period of time after that. If you have never been a client and unsubscribe from a mailing list then we will delete your details but retain sufficient information to keep a record of the fact you have unsubscribed.

We will keep the recording of telephone calls for as long as provided under applicable legal provisions: for a period of five years or up to seven years if deemed appropriate by the French Financial Markets Authority.

For further details on cookies please go to [ruffer.co.uk/privacy](https://ruffer.co.uk/privacy)

### 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 our Compliance Officer, Louise Stanway, at the following address  
Ruffer LLP  
80 Victoria Street  
London SW1E 5JL  
United Kingdom  
[compliance@ruffer.co.uk](mailto:compliance@ruffer.co.uk)

### 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. For individuals living or working in the UK, or where the alleged infringement has occurred in the UK, the relevant supervisory authority will be the Information Commissioner's Office. The number for their helpline is +44(0)303 123 1113.

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  
France  
+33 (0)1.53.73.22.22

A list of data protection authorities is available at [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)

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

Please get in touch with your usual contact at Ruffer via email, at the Ruffer address noted above or on +33(0)1.72.01.21.04.

### 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.

April 2019