

Privacy notice from Ruffer LLP



Recruitment candidates

General Data Protection Regulation (GDPR)

This privacy notice is solely for your information and sets out the basis on which any personal data about you that you provide to us, that we create, or that we obtain about you from other sources, will be processed by us. Please take the time to read and understand this privacy notice.

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 any information that can be used to identify individuals directly or indirectly, such as name, contact details or location details. For purposes of data protection law, we are the 'data controller' in relation to your personal data that we hold, because we determine the means and purposes (ie the 'how' and the 'why') of the processing of that personal data. Note that we use the term 'GDPR' in this notice to refer to both the EU GDPR and the UK GDPR (ie the EU GDPR as it applies in the UK post-Brexit).

What is the purpose of this notice?

One of the requirements of the GDPR is that we provide you with information about how and why we process your personal data, and your rights in relation to this. 'Processing' includes collecting, recording or storing personal data or carrying out any tasks using the personal data. This notice describes your rights under data protection law, including your right to object to certain of the processing which we carry out.

What personal data do we collect about you?

We will collect and process the following personal data about you

- 1 Information that you provide to us or one of our affiliates.** This includes information that you give to us by filling in forms (including those on our website) or by communicating with us by any method, including if you apply (or are referred to apply) for a role with us. If you are an applicant for a role with us then, as permitted by law, we may ask you to provide limited amounts

of sensitive personal data, such as disability information and trade union affiliation. Such information may include: basic identification and contact, such as your name, job title, contact information, and demographic details, information relating to your background (such as education, work history and professional experience), administrative and financial information, and family details, including their relationship to you.

- 2 Information we collect or generate about you.**

We may generate or collect information about you during our interactions with you. This may include: information generated during interviews, assessments or other interactions such as client relationship management notes, summaries of conversations and meetings, and details you provide when completing documentation (whether online, by email or in person), records of communications, which may include written notes or summaries of telephone or virtual conversations, and (where permitted) audio, transcription or automated summaries created through our communication tools, and security and access information, such as data captured through our on-premises security systems, (eg CCTV or visitor management records), and information about how you use and interact with our website, as further described at ruffer.co.uk/cookies

- 3 Information we obtain from other sources.**

We may collect and process information from recruitment firms, employment agencies, pre-employment screening providers, previous employers or referees, including: education and qualification details, references, address

details and where permitted by law, screening information such as credit and criminal record checks for and other publicly available information. Unless otherwise notified to you, all references provided to us should be considered to have been provided in confidence.

For what purposes do you process my personal data?

We process your personal data for the following purposes

- to identify and source talent through the use of recruiters, word of mouth referrals and recruitment fairs
- to assess your suitability for a role you have applied for
- to conduct psychometric, numeracy, or other competency assessments (which may be conducted by a third party) as part of the application process for certain roles
- to assess your eligibility to work in the UK
- to conduct pre-employment screening checks, including credit, criminal record, qualification and employment checks
- to make reasonable adjustments as a result of any disability or health condition you choose to tell us about and
- to conduct diversity and equal opportunities monitoring and other statistical analysis, carried out on an anonymised and aggregated basis.

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 (ie the employment, consultancy or partnership contract) 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 or regulatory obligation or
- the processing is necessary for the purpose of our legitimate interests (or the legitimate interests of one or more of our affiliates or a third party) or
- you consent to the processing.

‘Legitimate interests’ is a lawful basis that refers to the reasons why we might need to process your personal data in connection with our business interests, such as

- to attract and secure the best talent to work with us
- to ensure the candidates we offer positions to are suitable for the role and
- to monitor and improve our recruitment process.

When do you rely on my ‘consent’ and can I withdraw it?

We rely on your consent in the following limited circumstances

- 1 From time to time you may share with us information about you or your family, which we have not asked for but which we may record, such as information about your health, your plans or payments that you ask us to make from the portfolio (if applicable). This information may include health data or personal data revealing racial or ethnic origin, political opinions or religious beliefs, which constitutes ‘special category data’ under the GDPR. As such, we will only record such data with your consent.
- 2 If you are not a client, we rely upon your consent to invite you to meetings and other events which we think may be of interest to you, and also to send you materials on a one-off or regular basis, that you have requested.

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, use the contact details set out in this privacy notice.

Do I have to provide my personal data to you?

You are in control of the personal data you choose to provide us. However, if you choose not to provide certain details that are required as part of our recruitment process, then we may not be able to assess you for the role or conduct the relevant checks that we are required to undertake for regulatory purposes.

What rights do I have in relation to my personal data?

The GDPR gives you a number of legal rights in relation to your data, subject to certain criteria being met. These are

- right of access – a right to obtain access to the data we hold about you as well as information regarding the processing of that data

- right to withdraw your consent to our processing of your personal data at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so
- right to rectification – a right to request that we rectify the data we hold about you if it is inaccurate or incomplete
- right to data portability – in some circumstances, a right to receive some personal data in a structured, commonly used and machine-readable format and/ or request that we transmit those personal data to a third party where this is technically feasible. Please note this right only applies to personal data which you have provided to us
- right to object – a right to object to, and the right to request that we restrict, the processing of your data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to continue processing your personal data and / or to refuse that request
- right to erasure – a right to request that we erase your personal data in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal data, but we are legally entitled to retain it and
- the right to lodge a complaint with the data protection regulator (details of which are provided below) if you think that any of your rights have been infringed by us.

If you require any further information or wish to exercise any of these rights please get in touch using the contact details set out in this privacy notice.

With whom might you share my personal data?

We might share your personal data with third parties whom we engage to assist us with the recruitment process, such as

- recruitment firms
- psychometric, numeracy, or other competency assessment providers
- referees and
- pre-employment screening providers, who in turn may contact your academic institutions, previous employers and other third parties to verify information you have provided. We will notify you before undertaking any pre-employment screening checks.

Certain of your personal details will also be stored and accessible to the provider of our third party HR management system.

We outsource the early stages of the selection process for our technology graduate programme to a specialist third party graduate recruitment firm, and any applications for this scheme sent to Ruffer will be shared with them to manage. These third parties will only use your personal data as described in this privacy notice.

Do you ever share my personal data outside the UK or EU?

We may transfer your personal data to our affiliates or third parties located outside the UK or EU whose services we use to provide our services to you.

Where we transfer your personal data outside the UK or EU, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the UK or EU. This can be done in a number of ways, for instance

- the country that we send the data to might be approved by the UK Government or European Commission (as applicable) or
- the recipient has signed up to a contract based on ‘model contractual clauses’ approved by the UK Government or European Commission (as applicable), obliging them to protect your personal data.

In other circumstances the law may permit us to otherwise transfer your personal data outside the UK or EU. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law. For example, our pre-employment screening provider may transfer your data to an organisation outside the UK or EU which is not considered to be adequate or to have appropriate safeguards in place for data protection purposes, for example to verify your qualifications if you attended an institution outside the UK or EU. We ensure that these types of transfers only take place where necessary, and will be carried out in accordance with applicable data protection laws.

You can obtain more details of the protection given to your personal data when it is transferred outside the UK or EU (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us using the relevant contact details set out below.

How long do you keep my personal data?

How long we hold your personal data for will vary. The retention period will be determined by various criteria, including the purpose for which we are using it. If your application is unsuccessful, we will keep your personal data for as long as reasonably necessary to monitor repeat applications, or for a longer period, if you would like us to consider you for other roles.

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

No.

Do you use artificial intelligence tools or technology to process my personal data?

We (or our third party service providers) may use artificial intelligence tools to process your personal data. Such tools may be used for various purposes, including (but not limited to)

- tools for transcribing audio from recordings of internal and external meetings and conference calls
- transcription tools to process feedback and ‘save-to-text’ notes
- tools for transcribing interviews with job applicants and
- processing interview notes provided by applicants using our online tools, CVs and job applications.

We process your personal data in these ways for legitimate business purposes, including (in the case of our recruitment process) to match applicants to open vacancies and enable more effective review of applicants’ profiles and recording of interviews.

If you are to be subjected to automated decision-making that will have a legal or significantly similar effect on you, we will make it clear at the time so that you have the right to contest the decision, to express your point of view, and to require a human review of the decision as provided for by

applicable law. Where appropriate, we will obtain your consent before subjecting you to automated decision-making.

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

Please send your complaint to

Craig Lindsay-Smith
Data Protection Officer
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 or queries 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. 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 (ICO) ico.org.uk

ICO Helpline +44 (0)303 123 1113

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

Please get in touch with Craig Lindsay-Smith, or your Ruffer contact, via email, at the address above or on +44 (0)20 7963 8100.

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.