

Privacy notice from Ruffer LLP



Visitors to our website

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 information may include: contact details, including your name, job title, address, email address and mobile number, gender, marital status, date and place of birth,

nationality, health, national unique identifier, passport number, bank account or payment card details, income, employer, and employment history, educational details and family details, including their relationship to you.

- 2 Information we collect or generate about you.** This includes: information in any client relationship management notes, recordings of telephone conversations or related notes taken during such conversations, including audio and transcription data from conference calls, notes taken during meetings, information you provide to us in the completion of any documentation, whether through our website, by email (or other means of online communications) or in-person at any conferences, meetings or other events, data generated from our on premises security, such as CCTV footage or records of usage of guest passes, and information about how you use and interact with our website, as further described in the Cookie Policy section of our website. We may also generate data through our use of artificial intelligence and other software tools to automatically record, transcribe and summarise meetings, interviews and calls, and from our on premises security (such as CCTV footage or records of usage of guest passes)
- 3 Information we obtain from other sources.** This includes information received from any distributor, placement agent, custodian, bank, fund of funds or management or other company acting on your behalf, analytics providers, and search information providers, including search engines and other public sources.

For what purposes do you process my personal data?

We process your personal data 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 and use to provide you with the requested materials or invite you to relevant events and
- 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 uses to ensure that clients have received documents that we have a regulatory obligation to provide.

Cookies

Ruffer uses cookies in order to ensure the smooth functioning and security of our website. More information about how Ruffer uses cookies is available at ruffer.co.uk/cookies

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 or regulatory obligation
- the processing is necessary to establish, exercise or defend our legal rights or for the purpose of legal proceedings
- 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 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 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.

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. 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.

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 consent – the 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 who provide us with security, analytics and other web services, so that they can provide these services to us. 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 might 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.

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 (for example, where you are a client) and our legal obligations (for example, where certain laws or regulations set a minimum period of time for which we have to keep your personal data). If you are not a client and unsubscribe from one of our mailing lists, then we will delete your details, but may retain certain of your personal data to keep a record of the fact that you have unsubscribed.

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 and
- transcription tools to process feedback and ‘save-to-text’ notes.

We process your personal data in these ways for legitimate business purposes, including (but not limited to) client servicing and administrative tasks.

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 usual 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.