

Regulatory notice from Ruffer LLC



This notice is solely for your information. You do not need to take any action in relation to it.

‘Personal data’ is information that identifies individuals directly or from which individuals can be identified indirectly.

In some circumstances, such as the introduction and ongoing relationship management of clients, Ruffer LLC works with Ruffer LLP (established in the UK and bound by the UK Data Protection Act 2018, based on the European General Data Protection Regulation (2016/679) (the ‘UK Data Protection Rules’) to help us provide a cohesive service. In these circumstances, Ruffer LLC is processing personal data in the context of Ruffer LLP’s activities and that processing is subject to the UK Data Protection Rules. This notice applies only in respect of such processing. 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. This notice does not otherwise apply to Ruffer LLC’s processing of personal data. For example, this notice does not apply to Ruffer LLC’s collection and processing of personal data of website visitors by Ruffer LLC.

What is the purpose of this notice?

This notice is intended to provide you with details about 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 may process your personal data as a representative of one of Ruffer LLP’s clients or prospective clients for a number of different purposes

- for setting up the client’s account at Ruffer LLP
- for introducing and managing the client’s relationship with Ruffer LLP
- for reporting to you on the services we provide
- for supporting Ruffer LLP and any fund administrator in verifying your identity and carrying out regulatory checks
- for undertaking regulatory reporting
- 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
- for obtaining information in relation to your use of our website and
- for providing you with information about Ruffer LLP and Ruffer LLC.

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

These are as follows

- the processing is necessary for introducing you to Ruffer LLP and to help facilitate you entering into a contract with Ruffer LLP or in order to take steps at your request prior to you entering into a contract with Ruffer LLP
- 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 transfer personal data between group entities for internal administrative purposes
- 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 including by inviting you to events in which we think you will be interested or
- for the purposes of network or information security

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

We rely on your consent in only two situations–

- 1 From time to time you may pass to us information about you or your family, which we have not asked for but which we will record, such as information about your health, your plans or payments that you ask us to make from the portfolio. Occasionally this information may include personal data revealing racial or ethnic origin, political opinions or religious beliefs which we also may record with your consent. Once we record the information, we have a legitimate interest in storing the personal data as it helps us to provide a better service to you.

- 2 If you are not a Ruffer LLP client then 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, please inform your Ruffer contact.

What rights do I have over my personal data?

The UK Data Protection Rules give 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 Ruffer contact who will provide you with further information regarding how to exercise these rights.

To whom might you pass my personal data?

We might pass your personal data to third parties on whose services we rely in order to be able to set up your account with Ruffer LLP or provide services to you. These include: the custodians we use, those with whom Ruffer LLP transacts, including brokers, banks and market counterparties, the registrars of individual investments, regulatory or tax authorities, professional advisers such as auditors or lawyers, administrators, service and software suppliers and delivery and distribution partners.

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

If the entity which you represent is a Ruffer LLP client, or decides to become a Ruffer LLP client, it's a regulatory requirement that Ruffer LLP collects certain personal data about you in order for them to provide services to the client. If you fail to provide certain personal data when requested Ruffer LLP may not be able to provide services to the client.

Do you ever pass my personal data to others outside the UK or EU?

Ruffer LLC is based in the United States and so personal data will be processed in the United States. Third parties whose services we use may 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 UK or EU.

How long do you keep my personal data?

We will keep your personal data for as long as you represent one of Ruffer LLP's clients and for a reasonable period of time after that. If the entity which you represent decides not to become a Ruffer LLP client, then we will keep your personal data for a reasonable period of time after our most recent contact with that entity. The length of time we keep your personal data will reflect the obligations we have under applicable regulation to store personal data and the practicality of deleting or permanently anonymising personal data from the applications on which it is kept.

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 Chad Kutney at the following address

Ruffer LLC
300 Park Avenue
New York NY 10022
ckutney@ruffer.co.uk
and cc rufferllc-compliance@ruffer.co.uk
+1 917 947 3005

You may also contact Chad 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. 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.

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

Please get in touch with Chad Kutney, or your contact at Ruffer via email, at the Ruffer address noted above or on +1 917 947 3003.

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.