

# Regulatory notice from Ruffer LLP

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## General Data Protection Regulation (GDPR)

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

### 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.

### What is the purpose of this notice?

One of the requirements of GDPR is that we 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 purpose do you process my personal data?

We process your personal data for arranging for a payment to be made to you or your organisation out of a client portfolio.

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

These are as follows

- the processing is necessary for compliance with a legal obligation or
- the processing is necessary for the purpose of our legitimate interests.

'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.

The sections below provide further detail on the lawful grounds and, where the lawful ground is our legitimate interests, what the legitimate interests are which apply to the purposes for which we process your personal data. '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.

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### Verifying your identity and carrying out regulatory checks

The lawful grounds for processing are–

- it is necessary for compliance with a legal obligation and
- it is necessary for the purpose of our legitimate interests.

Our specific legitimate interests served by the processing include–

- ensuring our services are provided in a regulatory compliant manner and
- preventing fraud and financial crime.

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### Complying with various laws and regulations to which we are subject

The lawful grounds for processing are–

- it is necessary for compliance with a legal obligation and
- it is necessary for the purpose of our legitimate interests.

We have a legitimate interest in ensuring our services are delivered in a regulatory compliant manner.

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### When do you rely on my 'consent' and can I withdraw it?

We do not rely on your consent in relation to our processing of your personal data in order to arrange for a payment to be made to you or your organisation out of a client portfolio.

### 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 if you have one, or email [ruffer@ruffer.co.uk](mailto:ruffer@ruffer.co.uk) and let us know: we 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 or provide services to you. These include those who verify your identity and carry

out checks in order for us to arrange for a payment to be made to you or your organisation out of a client portfolio.

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

It's a regulatory requirement that we process certain of your personal data about you in order for us to arrange for a payment to be made to you or your organisation out of a client portfolio . If you fail to provide certain personal data when requested we may not be able to arrange for this.

### 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 if you have one, or please email [ruffer@ruffer.co.uk](mailto:ruffer@ruffer.co.uk).

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 a reasonable period of time after the checks that we undertake in order to make the payment that is to be made to you or your organisation. 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 our Data Protection Officer, 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. 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 Craig Lindsay-Smith, or your usual contact at Ruffer if you have one, or contact us at [ruffer@ruffer.co.uk](mailto:ruffer@ruffer.co.uk) 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.