

# Privacy notice from Ruffer LLC

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This Privacy Notice describes the personal information we collect or receive from or about you when you visit the portion of our website made available by Ruffer LLC ('website') and the ways in which we use and share it.

## Visitors to our website

### Collection of data through our website

We collect personal information through our website. Such information may be provided by you directly to us or a service provider acting on our behalf, or collected from you automatically when you use our website.

The personal information we may collect and the purposes for which we may use it include the following

- 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 Ruffer LLP client portal login we will receive and store your contact information, password and memorable information to verify your identity. The Ruffer LLP 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/cookies](https://ruffer.co.uk/cookies)

We also use analytics, firewall and advertising 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 anonymized 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
- we use the LinkedIn Insight tag to deliver content that we consider are more relevant to you and your interests when you are using LinkedIn. This means that after you have been to our site you may see some advertisements about our services elsewhere on the internet. We do not receive any personally identifiable information through this service, however, to the extent the third party service collects this information, this includes IP address, which are then hashed, and direct identifiers are removed within seven days.

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

The legal basis we rely on to process your personal information is that it 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 information, 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 Ruffer LLP 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.

We may also use your personal information to reach out to you about and market or promote new information to you; communicate with you; to help us improve our website and deliver a more personalized experience; for purposes of targeted advertising to you; otherwise at your direction or with your consent; and as permitted or required by law or as we may notify you.

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

Users are generally in control of the personal information they share with us through the website by inputting their details. If you are a client and do not want your personal information to be processed via our Ruffer LLP client portal then you can obtain up to date valuation information on your portfolio directly from your 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/cookies](https://ruffer.co.uk/cookies)

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

The UK Data Protection Act 2018, based on the European General Data Protection Regulation (2016/679) (the ‘UK Data Protection Rules’), to the extent that such Rules apply to our relationship with you, may 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 information 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 information that we hold about you and
- right to restriction: a right to require us to restrict our processing of your personal information.

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

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

We might pass your personal information to service provider and third parties who provide us with security, analytics and other web services so that they can provide these services to us. We may also share your personal information with our affiliates; our business partners, service providers and vendors; legal authorities as required by law or to protect our rights; and affiliated and nonaffiliated third parties as may be permitted by law (such as in connection with the sale or restructuring of all or part of our business).

### 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. Where required by UK Data Protection Rules, 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 information?

We will retain your personal information for as long as necessary to fulfill the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements. To determine the appropriate retention period for your personal information, we will consider the amount, nature and sensitivity of the personal information, the potential risk from unauthorized use or disclosure, the purposes for which we process personal information and whether we can achieve those purposes through other means, and applicable legal requirements. For further details on cookies please go to [ruffer.co.uk/cookies](https://ruffer.co.uk/cookies)

### 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 information?

Please send your complaint to Chad Kutney, at the following address

Ruffer LLC  
300 Park Avenue  
New York NY 10022  
[ckutney@ruffer.co.uk](mailto:ckutney@ruffer.co.uk)  
and cc [rufferllc-compliance@ruffer.co.uk](mailto: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 information and to the exercise of your rights noted above.

### Right to lodge a complaint with a supervisory authority

You may have a right to lodge a complaint in relation to our processing of your personal information 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, if applicable, would 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 information?

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 information or to clarify information we have provided in this notice.