

This Privacy Notice is relevant for those applying for vacancies with Rothschild & Co in Spain



## Privacy Notice - Spain

Rothschild & Co is responsible for ensuring that it uses your personal data in compliance with data protection law. The purpose of this notice is to explain what personal data Rothschild & Co collects and how Rothschild & Co uses it.

Where we use the terms “**Rothschild & Co**”, “**we**”, “**us**” and “**our**” in this notice, we are referring to the relevant Rothschild & Co group company with whom you are applying for a job.

Where we use the term your “**Application**” in this notice, we are referring to your application to work at Rothschild & Co.

For the purposes of data protection law, Rothschild & Co is a data controller in respect of your personal data.

Thank you in advance for your kind cooperation in this matter.

### Personal data collected by Rothschild & Co

Rothschild & Co will collect and process (e.g. obtain, record, use, share or hold) the following personal data about you:

- **Information that you provide to the Rothschild & Co group.** This is likely to include:
  - personal details such as, but not limited to, your full name, email address, contact details, employment history and qualifications (both academic and professional); and
  - any other details you provide in support of your Application, including (but not limited to) information contained in your CV and/or covering email and your reasons for applying to Rothschild & Co.
- **Information we, or other members of the Rothschild & Co group, otherwise collect about you.** This includes the following information that is collected in connection with your Application:
  - personal data that we collect through your communication and correspondences with us (including but not limited to the content, date and time of your email correspondence);
  - information obtained in relation to any interviews and assessments with you.
- **Information we obtain from other sources.** This includes personal data that we collect from screening, background and/or reference checks that we may perform on you as part of the recruitment process, which may include records of your previous employment, your qualifications (both academic and professional) and your education.



## Uses of your personal data

Your personal data may be stored and processed by Rothschild & Co in the following ways and for the following purposes:

- to consider your Application (including, in some cases, verifying your qualifications and references with those third parties you name) and your suitability for the job for which you have applied;
- to meet our legal and regulatory obligations;
- to exercise our rights and perform our obligations under laws that relate to you working at Rothschild & Co;
- to maintain consistent practices and procedures with respect to the recruitment of personnel across the Rothschild & Co group, including the performance of human resources and other functions of the Rothschild & Co group; and
- to maintain contact with you in the future and notify you of job vacancies within the Rothschild & Co group that you might be interested in.

We are entitled to use your personal data in these ways because:

- we need to in order to take steps in preparation for entering into a contract with you, in particular to consider you for a position at Rothschild & Co;
- we may need to in order to assess your fitness to work at Rothschild & Co;
- we may need to in order for us to perform our obligations and exercise our rights under laws that relate to you commencing work with Rothschild & Co;
- we have legal and regulatory obligations that we have to discharge;
- we may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings; and/or
- the use of your personal data as described is necessary for our legitimate business interests (or the legitimate interests of another Rothschild & Co group company), such as:
  - allowing us to effectively assess and verify your skills, qualifications and/or the strength and merits of your Application and your suitability for the role applied for;
  - allowing us to effectively and efficiently administer and manage the operation of our business;
  - ensuring a consistent approach to the recruitment of Rothschild & Co group personnel worldwide; or
  - being able to contact you in relation to your Application and the recruitment process.



If you are subsequently offered and accept employment at Rothschild & Co, the information we collect during the recruitment process will become part of your employment record.

## **Disclosure of your information to third parties**

### *Within the Rothschild & Co group*

Rothschild & Co may disclose your personal data to other members of the Rothschild & Co group for the purposes of:

- the management and administration of the Rothschild & Co group business, including the maintenance of the centralised databases storing personal data;
- enabling the performance of the functions that each of the Rothschild & Co group businesses may perform relating to regional or global HR decisions within the Rothschild & Co group; and
- assessing compliance with applicable laws, rules and regulations, and internal policies and procedures within the Rothschild & Co group.

Where personal data is disclosed to other members of the Rothschild & Co group, we will take steps to ensure that the personal data is accessed only by those Rothschild & Co group personnel that have a need to do so for the purposes described in this notice.

### *Outside the Rothschild & Co group*

In addition to the above, Rothschild & Co (and the other Rothschild & Co group companies to whom your personal data is disclosed) may share your personal data outside the Rothschild & Co group:

- to third party agents or contractors, bound by obligations of confidentiality, in connection with the processing of your personal data for the purposes described in this notice. This may include outsourced HR service providers, IT and communications service providers, law firms, accountants and auditors ("**Third Parties**"); and
- to the extent required by law, regulation or court order, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation.

## **International transfers of personal data**

Your personal data may be transferred to and stored in databases hosted and maintained outside the country(ies) in which you work, including in France, Switzerland, Guernsey, the Republic of Ireland and the Netherlands. It may be stored and processed by other Rothschild & Co group companies and/or Third Parties in other countries, which may include destinations outside of the European Economic Area ("**EEA**").



Where your personal data is transferred outside the EEA, 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 EEA. This can be done in a number of different ways, for instance:

- the country that we send the data to might be approved by the European Commission; or
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data.

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with applicable data protection law.

You can obtain more details about the protection given to your personal data when it is transferred outside the EEA by contacting us in accordance with the “Contact us” section.

### **Retention of 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 – we will need to keep the data for as long as is necessary for that purpose; and
- legal obligations – laws or regulation may set a minimum period for which we have to keep your personal data.

In some instances, we may retain your information to consider you for other roles and future opportunities at Rothschild & Co which may be of interest to you. If you do not want us to retain your information, or want us to update it at any stage, please contact us in accordance with the “Contact us” section.

### **Your rights**

You have a number of legal rights in relation to the personal data that we hold about you and you can exercise your rights by contacting the Data Protection Officer.

These rights include:

- the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- 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. We are not relying on your consent in order to process your personal data for the purposes and in the manner set out in this Privacy Notice;



- in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us (and not, for the avoidance of doubt, information we, or other members of the Rothschild & Co group, otherwise collect about you or information we obtain about you from other sources);
- the right to request that we rectify your personal data if it is inaccurate or incomplete;
- the 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;
- the right to request that we restrict our processing of your personal data in certain circumstances. Again, there may be circumstances where you ask us to restrict our processing of your personal data but we are legally entitled to refuse that request;
- the right to object to our processing of your personal data in certain circumstances. Please note that there may be circumstances where you object to our processing of your personal data but we are legally entitled to continue to process it; and
- the right to lodge a complaint with the Agencia de Protección de Datos (<https://www.agpd.es/>), if you think that any of your rights have been infringed by us.

### **Contact us**

If you would like further information on the collection, use, disclosure, transfer or processing of your personal data or the exercise of any of the rights listed in this notice, please contact the Data Protection Officer of Rothschild & Co group on [data.protection@rothschildandco.com](mailto:data.protection@rothschildandco.com)