

# Rothschild & Co North America Inc.



## Privacy Notice

Strictly Private and Confidential



# Contacts

---

Requests and inquiries should be addressed to:

**Human Resources (North America)**  
human.resources@rothschildandco.com

**Legal & Compliance (North America)**  
nyccompliance@rothschildandco.com

# Contents

---

<b>1. Introduction</b>	<b>4</b>
<b>2. Personal Data Collected by the Firm</b>	<b>5</b>
<b>3. Uses of Your Personal Data</b>	<b>6</b>
<b>4. Disclosure of Your Information</b>	<b>7</b>
<b>5. International Transfers of Personal Data</b>	<b>8</b>
<b>6. Retention of Personal Data</b>	<b>9</b>

---

# 1. Introduction

---

In the ordinary course of their business, Rothschild & Co North America Inc. and its subsidiaries (collectively, the “Firm”) receive personal data of their employees. The purpose of this Privacy Notice (this “Notice”) is to explain what personal data the Firm collects and how the Firm uses it.

This Notice is subject in its entirety to the requirements of applicable law and regulation, including, without limitation, the laws, regulations and rules of the Social Security Administration, the Equal Employment Opportunity Commission, the Fair Credit Reporting Act and the Americans with Disabilities Act. To the extent this Notice conflicts with any applicable laws or regulations, then such laws or regulations shall govern.

## 2. Personal Data Collected by the Firm

---

The Firm may collect and process (e.g., obtain, record, use, share or hold) the following personal data about you:

- **Information that you provide to the Firm.**
- **Information that the Firm, or other members of the Rothschild & Co group, otherwise collect about you.** This includes information that is collected in connection with your work with the Firm and is likely to include:
  - work-related details such as, but not limited to, your position, contact details, performance evaluation, absences, pay and benefits information, service history, a copy of your relevant agreement(s) with the Firm, passport details, gender and ethnicity, bank account information, photograph, health information, pregnancy and/or disability status, and details of any disciplinary processes and grievances raised;
  - personal data that the Firm collects through your use of its email and IT systems (including, but not limited to, your full name, email address and the content, date and time of your email correspondence);
  - recordings of telephone and electronic communications where necessary to comply with the Firm's legal, regulatory and internal compliance obligations; and
  - information obtained through an exit interview with you, if any (upon your ceasing to work for the Firm), including any future employer, details of your future job position and your reasons for leaving the Firm.
- **Information the Firm obtains from other sources.** This may include:
  - personal data that the Firm collects from background checks the Firm may perform on you in advance of you commencing work with the Firm; and
  - personal data concerning your physical or mental health (to the extent that this relates to, or affects your ability to perform, your work for the Firm), including information that you permit us to collect from health professionals.

### 3. Uses of Your Personal Data

---

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

- to meet the Firm's legal and regulatory obligations;
- to exercise the Firm's rights and perform the Firm's obligations under laws and regulations that relate to you working with Rothschild & Co;
- to assess your performance at work and your fitness to work;
- to perform the Firm's obligations and exercise the Firm's rights under your contract with us, and to enable you to carry out your work under that contract. For example, the Firm may use your personal data to pay you and provide benefits in connection with your work with us;
- to maintain consistent practices and procedures with respect to the collection, use, disclosure, transfer and processing of personal data across all Rothschild & Co group companies worldwide. These practices and procedures include the effective recording, management and administration of personal data;
- to maintain consistent practices and procedures with respect to the management and administration of personnel across the Rothschild & Co group, including the performance of human resources and other functions of the Rothschild & Co group;
- the Firm will use the private contact details relating to you and your next of kin (and that you have provided to us for emergency purposes) only in connection with an emergency;
- the Firm will process personal data in order to ensure your compliance with the Firm's internal policies; and
- the Firm may use information collected through exit interviews, if any, in order to comply with applicable laws, analyze your reasons for ceasing to work with the Firm, and, as the case may be, to maintain contact with you in the future.

## 4. Disclosure of Your Information

---

### 4.1 Within the Rothschild & Co Group

The Firm 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 centralized 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 Human Resources decisions within the Rothschild & Co group;
- benchmarking salaries and benefits within the Rothschild & Co group;
- assessing compliance with applicable laws, rules and regulations, and internal policies and procedures within the Rothschild & Co group; or
- providing you and others within the Rothschild & Co group with information necessary to perform your jobs, including enabling adequate communication for the performance of relevant duties (for example where your personal data is held as part of an internal directory such as Visage).

Where personal data is disclosed to other members of the Rothschild & Co group, the Firm 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.

### 4.2 Outside the Rothschild & Co Group

In addition to the above, the Firm (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 payroll or 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 the Firm is under a duty to disclose your personal data in order to comply with any legal obligation.

## 5. 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 the UK, 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.



## 6. Retention of Personal Data

---

How long the Firm holds your personal data will vary. The retention period will be determined by various criteria including:

- the purpose for which the Firm is using it – the Firm 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 the Firm has to keep your personal data.