



Privacy Notice – Applicants

Why is this Privacy Notice important?

At Rothschild & Co¹, we are committed to protecting the privacy and security of your personal data, in compliance with applicable data protection laws. For the purposes of data protection law, Rothschild & Co is a *data controller* in respect of your personal data.

Transparency in how we handle your personal data is crucial; this Privacy Notice will inform you about how we collect, use, store and protect your personal data. It also sets out what your rights are and how you can exercise your rights.

Who does this Privacy Notice apply to?

This Privacy Notice is for the attention of those who are applying for a job vacancy in a Rothschild & Co office in Europe (excluding Switzerland and Germany)².

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

How to navigate this Privacy Notice

There is a section below on each of the following areas:

1. Personal data collected by Rothschild & Co
2. Uses of your personal data
3. Disclosure of your personal data to third parties
4. International transfers of your personal data
5. Retention of your personal data
6. Security of your personal data
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¹ Where we use the terms “Rothschild & Co”, “we”, “us” and “our” in this Privacy Notice, we are referring to the relevant Rothschild & Co group company to which you have applied for a job.

² This includes job vacancies at Rothschild & Co in the following jurisdictions: Belgium, France, Greece, Guernsey, Hungary, Italy, Luxembourg, Monaco, Poland, Spain, Sweden and the UK. (Please note that a number of translations of this Privacy Notice are available, including in French, and can be obtained by contacting us (see the “Contact us” section below).)



1. *Personal data collected by Rothschild & Co*

We will collect and use personal data about you which is useful or necessary for us to assess your suitability for the job role to which you have applied. The personal data we will collect and use are mainly provided by you via our website, recruitment platforms, recruitment agents and other intermediaries, and through other forms of communication. However, we may also collect personal data from Rothschild & Co internal sources (such as members of staff assisting with the recruitment process). In some cases, personal data may come from external sources, as indicated within the list below.

Rothschild & Co will collect and process (for example, 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 information provided by you as part of your Application, including but not limited to:

- a) personal details such as your full name, email address, contact details, employment history and qualifications (both academic and professional);
- b) any other details you provide in support of your Application, such as information contained in your CV and/or covering email and your reasons for applying to Rothschild & Co;
- c) your history with the Rothschild & Co group (if you are currently employed by, have ever been employed by, or have ever interviewed with any member of the Rothschild & Co group);
- d) your “right to work” status; and
- e) your connection to any person who currently works at Rothschild & Co.
- f) Additionally, where strictly required by applicable laws, we may collect limited medical, health or disability-related information to the extent that this relates to or may affect, your ability to engage with or perform during the Application, interview or assessment process, and where you may require a reasonable adjustment as a result³.
- g) Additionally, in relation to an Application for a vacancy in the United Kingdom only, and only where you choose to provide such information to us, we may also collect diversity data including information about your sexual orientation, ethnic origin, socio-economic background, social mobility and primary or secondary nationalities.

Information we, or other members of the Rothschild & Co group, otherwise collect about you

This includes (but is not limited to) the following information collected in connection with your Application:

- a) personal data that we collect through your communication and correspondence with us (including but not limited to the content, date and time of your email correspondence); and
- b) information obtained in relation to any interviews and assessments with you.

Information we obtain from other sources

This may include personal data that we collect from background and/or reference checks that we may perform on you as part of the Application or recruitment process, where we are permitted by applicable laws (which may be conditioned on your consent) or where we are otherwise required to do so. This may include records of your qualifications (both academic and professional) and your directorships (including those previously held, if any).

2. *Uses of your personal data*

³ In Italy, this information would be limited to an applicant declaring whether they belong to a “protected category” or not.



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

- a) to consider your Application (including, in some cases where permitted or required, verifying your qualifications and references) and your suitability for the job for which you have applied;
- b) to communicate with you and provide updates regarding your Application and the recruitment process;
- c) where you have provided feedback, to improve our recruitment processes;
- d) to meet our legal and regulatory obligations;
- e) to exercise our rights and perform our obligations under laws that relate to you applying to work at Rothschild & Co;
- f) 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;
- g) 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; and
- h) 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.

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

- a) we may need to in order to take steps in preparation for entering into a contract with you;
- b) we may need to in order to assess your fitness to work at Rothschild & Co;
- c) we may need to in order for us to perform our obligations and exercise our rights under laws that relate to you applying to work at Rothschild & Co;
- d) we have legal and regulatory obligations that we have to discharge;
- e) we may need to in order to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
- f) we may, in some cases, be relying on your consent to process certain types of information (where this is relevant, we will make it clear that you have the option to provide such information or not for example, where we collect certain types of diversity data in the UK); and/or
- g) the use of your personal data may be necessary for our legitimate business interests (or the legitimate interests of another Rothschild & Co group company), such as:
 - i. allowing us to effectively assess and verify your skills, qualifications, the strength and merits of your Application, and your suitability for the role for which you applied;
 - ii. allowing us to effectively and efficiently administer and manage the operation of our business;
 - iii. ensuring a consistent approach to the recruitment of Rothschild & Co group personnel worldwide; and
 - iv. being able to contact you in relation to your Application and the recruitment process.

3. 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:

- a) facilitating the recruitment process (for example, personnel from other Rothschild & Co group companies may assist in assessing or evaluating your Application);

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- b) the management and administration of the Rothschild & Co group business, including the maintenance of the centralised databases storing personal data;
- c) 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
- d) facilitating and assessing compliance with applicable laws, rules and regulations, and internal policies and procedures.

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 who have a need to do so for the purposes described in this Privacy 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 and may rely on other third parties for the processing of your personal data for the purposes described in this Privacy Notice, including:

- a) to third party vendors, service providers or contractors, bound by obligations of confidentiality, in connection with the processing of your personal data for the purposes described in this Privacy Notice. This may include background check and vetting providers, recruitment platforms, IT and communications service providers, law firms, accountants and auditors; and
- b) 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).

Sharing your personal data with third parties may involve storing your personal data on the cloud.

4. *International transfers of your personal data*

Your personal data may be transferred to and stored in a jurisdiction other than the one to which you applied (your **"Application Jurisdiction"**). Such other jurisdictions may include destinations outside of the European Economic Area, the UK or Switzerland.

Where your personal data is transferred outside your Application Jurisdiction, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in your Application Jurisdiction. This can be done in a number of different ways, for example:

- a) the jurisdiction to which your personal data is sent might be approved by the European Commission (or by a relevant data protection authority or other governmental authority) as providing you with equivalent protections as in your Application Jurisdiction; or
- b) the recipient might have signed a contract which incorporates "standard contractual clauses" or similar, approved by the European Commission (or by a relevant data protection authority or other governmental authority), obliging them to protect your personal data.

In other circumstances the law may permit us to transfer your personal data outside your Application Jurisdiction.

You can obtain more details about the protection given to your personal data when it is transferred outside your Application Jurisdiction by contacting us (see the "Contact us" section below).



5. *Retention of your personal data*

How long we hold your personal data for will vary. The retention period will be determined by various criteria including:

- a) **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
- b) **legal obligations:** laws or regulation may set a minimum or a maximum period for which we have to keep your personal data.

You can obtain more details about the retention of your personal data by contacting us in accordance with the “Contact us” section below.

6. *Security of your personal data*

We have implemented appropriate technical and organisational measures to ensure a level of security commensurate with the risks presented. These measures are designed to avoid a circumstance where personal data is accidentally or unlawfully destroyed, lost or altered, or inappropriately disclosed or accessed.

You can obtain more details about the security of your personal data by contacting us in accordance with the “Contact us” section below.

7. *Your rights*

You have a number of legal rights in relation to the personal data that we hold about you. You can exercise your rights by getting in touch with us (see the “Contact us” section below).

These rights include:

- a) **Right of access:** the right to obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- b) **Right to withdraw consent:** where we are processing your personal data on the basis of your consent, you have the right to withdraw your consent at any time. Please note, however, that we may still be entitled to process your personal data if we have another legitimate reason for doing so;
- c) **Right to portability:** in some circumstances, the right to receive the personal data which you have provided to us 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;
- d) **Right of rectification:** the right to request that we rectify your personal data if it is inaccurate or incomplete;
- e) **Right of erasure:** 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;

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- f) **Right to restriction of processing:** the right to request that we restrict our processing of your personal data in certain circumstances. Please note that 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;
- g) **Right to object to processing:** 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 refuse that request;
- h) **Right to lodge a complaint with supervisory authority:** the right to lodge a complaint with the relevant supervisory authority if you think that any of your rights have been infringed by us. Details of the relevant supervisory authorities are found in the Appendix.

8. *Changes to this Privacy Notice*

We may need to update this Privacy Notice from time-to-time. You can find the most up-to-date version of this Privacy Notice by contacting us (see the “Contact us” section below).

9. *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 Privacy Notice, please contact the Rothschild & Co Data Protection team at data.protection@rothschildandco.com.



Appendix – Supervisory Authorities

Belgium	Autorité de protection des données <i>(Belgian Data Protection Authority)</i> www.dataprotectionauthority.be
France	Commission Nationale de l'Informatique et des Libertés <i>(CNIL)</i> www.cnil.fr
Greece	Hellenic Data Protection Authority www.dpa.gr
Guernsey	Office of the Data Protection Commissioner www.odpa.gg
Hungary	Nemzeti Adatvédelmi és Információszabadság Hatóság <i>(Hungarian National Authority for Data Protection and Freedom of Information)</i> www.naih.hu
Italy	Garante per la protezione dei dati personali <i>(Italian Data Protection Authority)</i> www.garanteprivacy.it
Luxembourg	Commission Nationale pour la Protection des Données <i>(National Commission for Data Protection)</i> https://cnpd.public.lu/fr.html
Monaco	Commission de Contrôle des Informations Nominatives <i>(Commission for Control of Personal Data)</i> www.ccin.mc
Poland	Prezes Urzędu Ochrony Danych Osobowych <i>(Office of the President for Personal Data Protection)</i> https://uodo.gov.pl , ul. Stawki 2, 00-193 Warszawa
Spain	Agencia Española de Protección de Datos <i>(Spanish Data Protection Agency)</i> www.aepd.es
Sweden	Integritetsskyddsmyndigheten <i>(Swedish Authority for Privacy Protection)</i> www.imy.se
UK	Information Commissioner's Office www.ico.co.uk