

**RBB ECONOMICS**  
**PRIVACY NOTICE (EXTERNAL)**  
**May 2018**

This is the Privacy Notice of the RBB Economics group which is made up of a number of entities. Therefore where this Privacy Notice refers to “**RBB Economics**”, “**we**”, “**us**” or “**our**”, it is referring to the relevant entity within the RBB Economics group. As an international group of companies our privacy practices may vary amongst the countries in which we operate to reflect local legal requirements and practices.

RBB Economics has a commitment to privacy in accordance with the applicable privacy laws in the countries in which we operate and we are committed to safeguarding your personal information. This Privacy Notice sets out how we collect and process your personal data. Personal data as referred to in this Privacy Notice is any personal information which identifies you as a natural person (see paragraph 3 below for further details) being one of our clients (or potential clients) or a browser of our website or supplier. This Privacy Notice also provides certain information that is legally required and lists your rights in relation to your personal data.

This Privacy Notice is not intended for children and we do not knowingly collect personal data relating to children. Additionally, this Privacy Notice is not intended to apply to personal data collection during the recruitment of employees or other personnel we engage to work for us, for which there is a separate privacy notice.

This Privacy Notice may vary from time to time so please check it regularly. This Privacy Notice was published on 25 May 2018 and is the most recent version.

**1 DATA CONTROLLER**

Your data controller will be the member of the RBB Economics group that you have instructed or that is providing services or communication to you and who first collected your personal data.

Other than for those entities set out below, the data controller will be RBB Economics LLP (company number OC315356) whose registered office is at 199 Bishopsgate, London, EC2M 3TY. As a controller we use the personal data we hold about you in accordance with this Privacy Notice. In the case of RBB Netherlands BV, RBB Belgium NV, RBB Economics France LLP and RBB Economics Germany LLP, those entities will be the relevant data controller.

**2 CONTACT US**

- a) If you need to contact us in connection with our processing of your personal data, then our contact details are: email: [gdpr@rbbecon.com](mailto:gdpr@rbbecon.com) or telephone: 020 7421 2410.

- b) Our Data Privacy Manager is our Chief Operating Officer and you can contact him using the above contact details.

### 3 CATEGORIES OF PERSONAL DATA WE COLLECT

The categories of personal data about you that we may collect, use, store, share and transfer are:

- (a) **Individual Data.** This includes personal data which relates to your identity, such as your first name, middle name, last name, username or similar identifier, marital status, title, date of birth and gender, billing address, email and postal address, land line and mobile phone numbers and fax number;
- (b) **Business Data** This includes any personal data contained in business information which is processed in a project or client contractual relationship with us or voluntarily provided by you, such as instructions given, requests and projects;
- (c) **Marketing Data.** This includes personal data which relates to your marketing preferences, such as information about your preferences in receiving marketing materials from us and our third parties and your communication preferences;
- (d) **Information Technology Data.** This includes personal data which relates to your use of our website, such as your internet protocol (IP) address, login data, traffic data, weblogs and other communication data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website;
- (e) **Economic and Financial Data.** This includes personal data which relates to your finances, such as your bank account and payment card details and information which we collect from you for the purposes of the prevention of fraud;
- (f) **Payment Data.** This includes personal data related to the transactions you have conducted with us, such as details about payments made, details of subscriptions to our services or publications and other details of services you have purchased from us;
- (g) **Audio and Video Data.** This includes personal data which is gathered using our CCTV or other recording systems at our locations in the form of images, video footage and sound recordings;
- (h) **Legal and Compliance.** This includes personal data that we legally require for compliance purposes, including information about any relevant and material litigation or other legal proceedings against you or a third party related to you and interaction with you which may be relevant for antitrust purposes;
- (i) **Health Data.** This includes personal data which is gathered for health and safety purposes or in connection with the registration for and provision of access to an event or seminar or any dietary requirements;

We may also create personal data about you when you communicate with us for any reason as we may wish to make a written record of key details of the conversation.

We may also obtain and use certain aggregated data such as statistical or demographic data for any purpose (“**Aggregated Data**”). Aggregated Data may be derived from your personal data but does not directly or indirectly reveal your identity. For example, we may aggregate your Information Technology Data to calculate the percentage of users accessing a specific feature on our website. However, if we re-combine or re-connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this Privacy Notice.

#### 4 **THE SOURCES FROM WHICH WE OBTAIN YOUR PERSONAL DATA**

We obtain your personal data from the following sources:

- (a) Directly from you, either in person (at our locations or otherwise), via our website or by telephone. This could include personal data which you provide when you (or your organisation):
  - seek advice from us and instruct us to provide our services to you;
  - browse or make an enquiry or otherwise interact with us via our website;
  - when you attend any of our seminars or other events;
  - subscribe to our services or publications;
  - request marketing to be sent to you;
  - Offer to provide or provide services to us;
  - complete a survey from us;
- (b) Automated technologies, such as CCTV or other recording systems, cookies, server logs and other similar technologies.
- (c) Third parties, such as:
  - search information providers;
  - providers of technical, payment and delivery services;
  - data brokers or aggregators;
  - providers of social media platforms (such as FaceBook, Twitter, LinkedIn and Instagram) for example where you share our content through social media;
  - credit reporting agencies;
  - Other organisations that you have dealings with; and
- (d) Publically available sources, such as:
  - Trade publications eg. Chambers

#### 5 **HOW WE USE YOUR PERSONAL DATA & OUR BASIS FOR USING IT**

##### (a) **Where we are not relying on consent**

We may rely on one or more of the following legal bases when processing your personal data. We have set out below the purposes for which we may process your personal data:

Purposes for which we process your personal data	Categories of personal data used	The lawful basis on which we can do this
<p>To register you (or you organisation) as a client and carry out the client registration formalities.</p>	<p><b>Individual data</b>  <b>Business data</b>  <b>Payment data</b>  <b>Legal &amp; Compliance data</b></p>	<p>The processing is necessary:</p> <ul style="list-style-type: none"> <li>• to <b>perform our contract</b> with you (or your organisation);</li> <li>• <b>to comply with the law.</b></li> </ul> <p>Our <b>legitimate interest</b> in the provision of our services to our clients.</p>
<p>Compliance with our legal and regulatory obligations (such as record keeping obligations and reporting to and/or being audited by national and international regulatory bodies), compliance screening or recording obligations (e.g. under antitrust laws, export laws, trade sanction and embargo laws, for anti-money laundering, financial and credit check and fraud and crime prevention and detection purposes).</p>	<p><b>Individual data</b>  <b>Business data</b>  <b>Payment data</b>  <b>Legal &amp; Compliance data</b>  <b>Economic &amp; Financial data</b></p>	<p>The processing is necessary:</p> <ul style="list-style-type: none"> <li>• to <b>perform our contract</b> with you (or your organisation);</li> <li>• <b>to comply with the law.</b></li> </ul> <p>Our <b>legitimate interest</b> in the provision of our services to our clients.</p>
<p>In order to perform our obligations to you, contractual or otherwise. This would include providing our advice and services to you as instructed or as requested by you or your organisation.</p>	<p><b>Individual data</b>  <b>Business data</b>    <b>Legal &amp; Compliance data</b></p>	<p>The processing is necessary to <b>perform our contract</b> with you, or services otherwise agreed with you (or your organisation).</p>
<p>In order to use your personal data in life or death or emergency situations and there is no time to gain your consent (e.g. in the event of an accident and we have to give your personal details to medical personnel) or others in connection with the situation.</p>	<p><b>Individual data</b>  <b>Health data</b></p>	<p>The processing is necessary</p> <ul style="list-style-type: none"> <li>• in order to protect the <b>vital interests</b> of an individual where that individual is physically or legally incapable of giving consent or</li> <li>• <b>to comply with the law.</b></li> </ul>
<p>In order to manage our relationship with you (or your organisation) including:</p> <ul style="list-style-type: none"> <li>• to send you important notices such as communications about changes to our terms and conditions and policies (including this Privacy Notice);</li> </ul>	<p><b>Individual data</b>  <b>Business data</b>  <b>Payment data</b>  <b>Legal &amp; Compliance data</b>  <b>Economic &amp; Financial Data</b></p>	<p>The processing is necessary:</p> <ul style="list-style-type: none"> <li>• to <b>perform any contract</b> entered into with you;</li> <li>• <b>to comply with the law.</b></li> </ul> <p>Our <b>legitimate interests</b> in the management and operation of our business, to keep our records updated and</p>

<ul style="list-style-type: none"> <li>• to provide you with important real-time information about the services you have requested us to provide (e.g. a delay due to unforeseen circumstances);</li> <li>• to send you information and advice you have requested;</li> <li>• accounting, auditing, billing and collection, support services;</li> <li>• to deal with your enquiries; and</li> <li>• to ask you to leave a review or feedback on us.</li> </ul>		<p>to study how clients use our services.</p>
<p>In order to administer and protect our business, protecting the security of and managing access to our premises, IT and communication systems, online platforms, websites and other systems, preventing and detecting security threats, fraud or other criminal or malicious activities and to comply with our security policies.</p>	<p><b>Individual data</b> <b>Business data</b> <b>Information</b> <b>Technology data</b> <b>Legal &amp; Compliance data</b></p>	<p>The processing is necessary:</p> <ul style="list-style-type: none"> <li>• for our <b>legitimate interest</b> in the provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise; and</li> <li>• <b>to comply with the law.</b></li> </ul>
<p>For insurance purposes.</p>	<p><b>Individual data</b> <b>Business data</b> <b>Legal &amp; Compliance data</b></p>	<p>The processing is necessary:</p> <ul style="list-style-type: none"> <li>• for our <b>legitimate interests</b> in the management and operation of our business</li> <li>• to comply with the law</li> </ul>
<p>In order to make suggestions and recommendations to you about goods or services that may be of interest to you, deliver relevant website content and advertisements to you and to measure or understand the effectiveness of our marketing.</p>	<p><b>Individual data</b> <b>Business data</b> <b>Marketing data</b></p>	<p>The processing is necessary for our <b>legitimate interests</b> to study how customers use our products/services, to develop our products and services and ensure our marketing is relevant to you, to grow our business and to inform our marketing strategy.</p>
<p>For internal purposes to use data analytics, to identify usage trends, determine and measure the effectiveness of promotional campaigns and marketing and to improve our website, products/services, marketing,</p>	<p><b>Individual data</b> <b>Business data</b> <b>Information</b> <b>Technology data</b></p>	<p>The processing is necessary for our legitimate interest in defining types of customers for our products and services, to keep our website updated and relevant, to develop our</p>

customer relationships and experiences.		business and to inform our marketing strategy.
To communicate with you about, and administer your participation in, special events, programs, promotions, etc.	<b>Individual data</b> <b>Business data</b>	The processing is necessary: <ul style="list-style-type: none"> <li>• for <b>performance of a contract</b> with you.</li> </ul> Our <b>legitimate interests</b> to promote our business.
To sell, finance or make read our business for sale or disposal including to advisors and potential buyers	<b>Individual data</b> <b>Business data</b> <b>Payment data</b> <b>Information</b> <b>Technology data</b>	Our <b>legitimate interests</b> to dispose of or make ready our business for sale or finance our business.
In order to comply with court orders and exercise and/or defend our legal rights.	<b>Individual data</b> <b>Business data</b> <b>Payment data</b> <b>Information</b> <b>Technology data</b>	The processing is necessary for our <b>legitimate interests</b> in protecting our business and property and recovering debts owed to us.

(b) **Where we may rely on consent**

For certain purposes it is appropriate for us to obtain your prior consent. The legal basis of consent is only used by us in relation to processing that is entirely voluntary – it is not used for processing that is necessary or obligatory in any way.

- (c) You may at any time withdraw the specific consent you give to our processing your personal data. Please contact us using the contact details set out in paragraph 2 to do so. Please note even if you withdraw consent for us to use your personal data for a particular purpose we may continue to rely on other bases to process your personal data for other purposes.

6 **WHO RECEIVES YOUR PERSONAL DATA**

We may disclose your personal data to:

- (a) our group companies and affiliates or third party data processors who may process data on our behalf to enable us to carry out our usual business practices. Any such disclosure will only be so that we can process your personal data for the purposes set out in this Privacy Notice;
- (b) tax, legal and other regulators or authorities, including those who request your personal data or to report any potential or actual breach of applicable law or regulation;

- (c) external professional advisers such as accountants, bankers, insurers, auditors and lawyers;
- (d) law enforcement agencies, courts or other relevant party, to the extent necessary for the establishment, exercise or defence of legal rights;
- (e) third parties where necessary for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties;
- (f) third parties which are considering or have decided to buy some or all of our assets or shares, merge with us or to whom we may transfer our business (including in the event of a reorganisation, dissolution or liquidation);

## **7 PERSONAL DATA ABOUT OTHER PEOPLE WHICH YOU PROVIDE TO US**

If you provide personal data to us about someone else (such as one of your directors or employees, or someone with whom you have business dealings) you must ensure that you are entitled to disclose that personal data to us and that, without our taking any further steps, we may collect, use and disclose that personal data as described in this Privacy Notice.

You must ensure the individual concerned is aware of the various matters detailed in this Privacy Notice, as those matters relate to that individual, including our identity, how to contact us, the way in which we collect and use personal data and our personal data disclosure practices, that individual's right to obtain access to the personal data and make complaints about the handling of the personal data, and the consequences if the personal data is not provided.

## **8 INTERNATIONAL TRANSFERS OF PERSONAL DATA**

It is possible that personal data we collect from you may be transferred, stored and/or processed outside the European Economic Area, including in South Africa or Australia.

In connection with such transfers we will ensure that:

- (a) there are appropriate safeguards in place pursuant to Article 46 (or English law equivalent) GDPR such as binding corporate rules or the model approved contractual clauses between us and the recipient – details of safeguards can be obtained by contacting us using the contact details set out in paragraph 2 ; or
- (b) the transfer is one approved by the European Commission as providing adequate protection envisaged by Article 45 GDPR (or English law equivalent) such as to a country approved by the European Commission or privacy shield ; or
- (c) one of the derogations for specific situations in Article 49 GDPR (or English law equivalent) applies to the transfer including explicit consent or necessary for the performance of a contract or exercise or defence of legal claims.

## 9 HOW LONG WE WILL STORE YOUR PERSONAL DATA FOR

- (a) We will take appropriate technical and organisational measures to keep your personal data confidential and secure in accordance with our internal procedures.
- (b) We will store your personal data for the time period which is appropriate in accordance with the criteria set out below:
- We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
  - To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- (c) We will, in particular, retain your personal data where required for us to assert or defend against legal claims until the end of the relevant retention period or until the claims in question have been settled.
- (d) We keep the length of time that we hold your personal data for under review. These reviews take place annually.

## 10 CONTRACTUAL OR STATUTORY REQUIREMENTS ON YOU TO PROVIDE PERSONAL DATA

- (a) In certain circumstances the provision of personal data by you is a requirement:
- to comply with the law or a contract; or
  - necessary to enter into a contract.
- (b) It is your choice as to whether you provide us with your personal data necessary to enter into a contract or as part of a contractual requirement. If you do not provide your personal data then the consequences of failing to provide your personal data are that we may not be able to perform to the level you expect under our contract with you. An example of this would be where we are unable to provide you with our services as we do not have your full details, or where we cannot perform our contract with you at all because we rely on the personal data you provide in order to do so. Please see our terms and conditions for further details.

## 11 ACCURACY OF YOUR PERSONAL INFORMATION

It is important that the personal data we hold about you is accurate and current and we take all reasonable precautions to ensure that this is the case but we do not undertake to check or verify the accuracy of personal data provided by you. Please keep us informed if your personal data changes during your relationship with us either by logging onto your account on the website or by contacting us using the detail in paragraph 2 above. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

## 12 YOUR RIGHTS IN RELATION TO YOUR PERSONAL DATA

12.1 Subject to applicable law including relevant data protection laws, in addition to your ability to withdraw any consent you have given to our processing your personal data (see paragraph 5(c)), you may have a number of rights in connection with the processing of your personal data, including:

- (a) the right to request access to your personal data that we process or control;
- (b) the right to request rectification of any inaccuracies in your personal data or, taking into account the purposes of our processing, to request that incomplete data is completed;
- (c) the right to request, on legitimate grounds as specified in law:
  - erasure of your personal data that we process or control; or
  - restriction of processing of your personal data that we process or control;
- (d) the right to object, on legitimate grounds as specified in law, to the processing of your personal data;
- (e) the right to receive your personal data in a structured, commonly used and machine-readable format and to have your personal data transferred to another controller, to the extent applicable in law; and
- (f) the right to lodge complaints regarding the processing of your personal data with the Information Commissioner's Office or other relevant supervisory body. Please see <https://ico.org.uk/concerns/> for how to do this.

If you would like to exercise any of the rights set out above, please contact us using the contact details set out in paragraph 2.

## 13 LINKS TO OTHER WEBSITES

This policy only applies to us. If you link to another website from our website, you should remember to read and understand that website's privacy policy as well. We do not control unconnected third-party websites and are not responsible for any use of your personal data that is made by unconnected third party websites.