

BOI (I.O.M.) Limited – privacy statement

This statement is designed to help you, as a creditor or former customer of BOI (I.O.M.) Limited (“BOI”), understand how your personal data is processed by BOI and why.

Personal data is data which relates to you when you can be identified from that data or from that data when combined with other information which is in the possession of or is likely to come into the possession of BOI.

BOI takes your privacy seriously and we want you to be clear about:

- What information we hold
- How we use your information
- Who we share your information with
- How you can control our use of your information

By “use” of your information, we mean any use of it including, but not limited to, viewing, obtaining, holding, processing, storing, sharing, transferring, archiving and erasing information.

What information we hold and how we use it

If you are a creditor or former customer and you had an account with us from June 2007 onwards, we have a record of your address and contact details. This is to enable us to verify and respond to any request for information that you might make. We also maintain copies of your statements of account for the purposes of our record keeping requirements and to provide you with information from them if required.

If you are a creditor or former customer who opened an account with us at any time, we may have a copy of the mandates that you put in place in relation to your account and copies of correspondence for the purposes of our record keeping requirements.

If you are a former customer of our Jersey trust company, we have information and documentation in relation to our business relationship with you. This information is retained for the purposes of our record keeping requirements.

If you are a former staff member, we have retained a copy of your staff file in order to comply with our record keeping requirements. We also process data in relation to staff pensions which includes providing certain information to a company called Mercer Limited for the purposes of compliance with accounting standards. Mercer Limited is an affiliate of the Marsh & McLennan companies with which BOI has the appropriate data processor agreement. We do not use your data for marketing purposes and we will not provide your data to any third party so that they can market their products or services to you.

Storing your information

All of the data that we process about you is held securely in paper form and/or electronically.

Data held in paper form is held in the offices of Dixcart Management (IOM) Limited (“**Dixcart**”) which acts as the administrator of BOI. Data is also held off site within a secure storage facility provided by an Isle of Man company.

Electronic data is held on a secure standalone, dedicated server. Access to this server is restricted and there is no external access to the server.

Sharing your information

The information and documentation that we retain is accessible by the staff of Dixcart who need to see it. Where required by law or for the prevention or detection of crime, we and/or Dixcart may share your information with statutory, regulatory and financial bodies, law enforcement authorities and fraud prevention agencies (including, but not limited to Isle of Man and UK governmental authorities, judicial bodies and tax authorities).

As noted above, data in relation to staff pensions is provided to Mercer for the purposes of calculations to enable us to comply with accounting standards.

Retention of your information

We are maintaining records and data to comply with our statutory, legal and regulatory responsibilities as well as what we deem to be reasonable practice where there is no record keeping period set down in law or other rules. We will destroy client and staff data in line with these retention periods.

If you have specific queries in relation to retention periods, please contact the Privacy Officer at boi@dixcart.com

Your information rights

If you wish to see the data processed about you by BOI, please contact the Privacy Officer at boi@dixcart.com.

You have additional rights under the Isle of Man’s data protection legislation and regulation such as the right to rectification of incomplete data, the right to object to processing and the right of erasure of data.

You have the right to receive the personal data you provide to us in a structured, commonly used and machine readable format and have the right to transmit this data to another controller, without hindrance from us.

If you wish to exercise any of these rights, please contact the Privacy Officer at boi@dixcart.com

If you wish to make a complaint about how we have processed your data, please contact the Privacy Officer at boi@dixcart.com. You can also contact the Information Commissioner on 01624 693260 or by emailing ask@inforights.im

15/10/2019