

FAIR PROCESSING NOTICE

This Fair Processing Notice tells you about processing of “**personal data**” by the Charles Taylor Isle of Man Group.¹

We may hold and process your personal data in order to provide services relating to life insurance and fund management. Our activities (“*the Services*”) include assisting, administering and performing contracts of insurance and fund investment. We also provide other services related to our core business. When providing the Services we are “*data controllers*” of your personal data, though sometimes, in providing the services on behalf of another party we will be operating as a “*data processor*.” We are committed to processing all personal data fairly, lawfully, and transparently.

To make things simpler, we have nominated one data controller, Charles Taylor Insurance Services (IoM) Limited², to handle all requests or queries you might have about our processing of your personal data. We have jointly appointed a Data Protection Officer to oversee compliance with data protection law, whose contact details are: Gordon Bon, The Minster Building, 21 Mincing Lane, London, EC3R 7AG, +44 20 7680 5665, gordon.bon@ctplc.com.

You have various legal rights in your personal data including the right of: information and access to your data, including a “portable” copy of your data; erasure and rectification of your data; and rights to restrict or object to processing of your personal data. Where we rely on your consent to process your personal data you can withdraw that consent at any time. To exercise these data subject rights please contact: IOIDataProtection@ctplc.com. If the matter has not been resolved satisfactorily you may complain to the Isle of Man Information Commissioner’s office by emailing ask@inforights.im or writing to the Isle of Man Information Commissioner at PO Box69, Douglas, Isle of Man, IM99 1EQ.

The data we generally hold and process includes names, contact details, dates of birth, insurance policies or claims in which you may have been involved. This may include special category personal data including, potentially, information about your medical history, race, ethnicity, sexual orientation, religious beliefs, trade union membership, genetic and biometric data, political opinions, and any other physical or mental health details. This personal data is held only for the purposes of performing the Services.

We obtain your data either directly from you or your agents, or from our corporate clients, who include businesses, trusts and insurance companies, who in turn will have obtained it from you or your agent or your employer or family member in relation to insurance or fund investment policies

The main lawful bases for processing personal data is:

- where you are party to a contract, and that contract requires your personal data to be processed.

The other lawful bases for processing personal data include:

- where we may have legal obligations that mean we have to process personal data, including anti-

¹ The companies who, in whole or in part, form the Charles Taylor Isle of Man Group are: Charles Taylor Holdings (IoM) Limited; LCL International Life Assurance Company Limited; Charles Taylor Insurance Services (IoM) Limited; Charles Taylor (IoM) Limited; Charles Taylor International Fund Managers (IoM) Limited; Allied Dunbar International Nominees Limited; The Signal Mutual Indemnity Association (Isle of Man) Limited; and Standard Reinsurance (Isle of Man) Limited.

² Charles Taylor Insurance Services (IoM) Limited address is St. George's Court (2nd floor), Upper Church Street, Douglas, IM1 1EE, Isle of Man and is registered with the IC (registration number N000131).

money laundering obligations, checking criminal convictions, and checking international sanctions registers.

- where you have given us your **consent**, we rely on that consent, including your explicit consent to publish special category personal data;
- Some aspects of processing personal data in insurance and funds administration may fall within the “**public interest**” lawful basis.

In all circumstances, however, we also rely on our legitimate interests, and those of our clients, to ensure that individuals are properly protected by the provision of adequate insurance against the risk of misfortune. Where we rely on our legitimate interests, we will always balance them against the rights and freedoms of the people whose personal data we process. Where their rights override our legitimate interests we will cease to process personal data.

From time to time, we may need to disclose personal data to third parties. Sometimes, these will be companies who process on our behalf and only act upon our instructions. Sometimes, these will be individuals and companies who are needed to provide services such as: discretionary managers; investment managers; actuaries; consultants; lawyers; and commercial service providers. We may also disclose personal data where we are required by law, to law enforcement agencies, government agencies, tax authorities and regulatory bodies.

From time to time we will need to transfer your personal data outside the Isle of Man or the European Union. We will, save for exceptional circumstances, only do so:

- to a country in the European Economic Area or that the European Commission has certified as having adequate data protection law;
- under Binding Corporate Rules within our group of companies;
- with your consent, to protect your vital interests, for important reasons of public interest, to perform a contract in your interests, for the defence of legal claims.

We will always keep records of where your data has been sent outside of the Isle of Man or the European Union and you can have access to these records if you wish. We will generally keep personal data for as long as we have a lawful basis, or where that lawful basis comes to an end, for either six years and three months or for ten years and three months hereafter, depending on a number of factors including the type of data, the purpose for which we use that data and our regulatory and legal obligations attached to this use.

We do not retain personal data in an identifiable format for longer than is necessary.

The exceptions to the above are where the law requires us to hold your personal data for a longer period, you exercise your right to have the data erased (where it applies) and we do not need to hold it in connection with any of the reasons permitted or required under the law, or in limited cases, the law permits us to keep your personal data indefinitely provided we have certain protections in place.

We do not undertake any automated decision-making using your personal information, including profiling.

Further details can be found in our privacy policies, which can be provided upon request.