

BACKGROUND

Chase Buchanan Ltd understands that your privacy is important to you and that you care about how your personal data is used. We respect and value the privacy of all of our clients and will only collect and use personal data in ways that are described here, and in a way that is consistent with our obligations and your rights under the law.

1. Information about us

Chase Buchanan and Chase Buchanan Insurance Services, Agents & Advisors Ltd, are companies registered in Cyprus under number HE343180 and HE370271 respectively, whose registered offices are: Office 2, 6th Floor, Panagides Court, Chrysanthou Milona 1, Limassol 3030, Cyprus.

Our registered address is our main trading address.

We have an administration centre in the UK at 2 St Georges Yard, Castle Street, Farnham, Surrey GU9 7LW and various representative offices around the EU.

Our VAT number is: CY10343180M

Our Data Protection Officer is: Georgina Eldridge

Email address: georgina.eldridge@chasebuchanan.com

Telephone number: +44 (0)1252 852045

Postal Address: 2 St Georges Yard, Castle Street, Farnham, Surrey GU9 7LW, UK.

We are licenced and supervised by the Cyprus Securities and Exchange Commission ("CySEC") as a Cyprus Investment Firm (CIF) and our Licence no is 287/15 and by the Cyprus Insurance Companies Control Service with Licence No's 492,3906 and 507.

2. What does this notice cover?

This Privacy Information explains how we use your personal data: how it is collected, how it is held, and how it is processed. It also explains your rights under the law relating to your personal data.

3. What is personal data?

Personal data is defined by the General Data Protection Regulation (EU Regulation 2016/679) (the "GDPR") as 'any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier'. Personal data is, in simpler terms, any information about you that enables you to be identified. Personal data covers obvious information such as your name and contact details, but it also covers less obvious information such as identification numbers, electronic location data, and other online identifiers.

The personal data that we use is set out in Part 5, below.

4. What are my rights?

Under the GDPR, you have the following rights, which we will always work to uphold:

- a) The right to be informed about our collection and use of your personal data. This Privacy Notice should tell you everything you need to know, but you can always contact us to find out more or to ask any questions using the details in Part 11.
- b) The right to access the personal data we hold about you. Part 10 will tell you how to do this.
- c) The right to have your personal data rectified if any of your personal data held by us is inaccurate or incomplete. Please contact us using the details in Part 11 to find out more.
- d) The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your personal data that we have. Please contact us using the details in Part 11 to find out more.
- e) The right to restrict (i.e. prevent) the processing of your personal data.
- f) The right to object to us using your personal data for a particular purpose or purposes.
- g) The right to data portability. This means that, if you have provided personal data to us directly, we are using it with your consent or for the performance of a contract, and that data is processed using automated means, you can ask us for a copy of that personal data to re-use with another service or business in many cases.
- h) Rights relating to automated decision-making and profiling. Part 6 explains more about how we use your personal data, including automated decision-making and profiling.

For more information about our use of your personal data or exercising your rights as outlined above, please contact us using the details provided in Part 11.

Further information about your rights can also be obtained from the Office of the Commissioner for Personal Data Protection in Nicosia, Cyprus.

If you have any cause for complaint about our use of your personal data, you have the right to lodge a complaint with the Office of the Commissioner for Personal Data Protection in Nicosia, Cyprus.

5. What personal data do you collect?

We may collect some or all of the following personal data (this may vary according to your relationship with us):

- Name
- Date of birth
- Gender
- Address
- Email address
- Telephone number
- Marital Status
- Dependants
- Nationality
- Passport Number
- NI Number
- Profession
- Salary
- Payment information
- Bank details
- Financial information
- Tax identification

6. How do you use my personal data?

Under the GDPR, we must always have a lawful basis for using personal data. This may be because the data is necessary for our performance of a contract with you, because you have consented to our use of your personal data, or because it is in our legitimate business interests to use it. Your personal data may be used for one of the following purposes:

- Providing and managing your account.
- Supplying our products and services to you. Your personal details are required in order for us to enter into a contract with you.
- Personalising and tailoring our products and services for you.
- Communicating with you. This may include responding to emails or calls from you.
- Supplying you with information by email and post that you have opted-in to (you may unsubscribe or opt-out at any time by responding directly to any communication or contacting our Data Protection Officer, Georgina Eldridge).

With your permission and/or where permitted by law, we may also use your personal data for marketing purposes, which may include contacting you by email, telephone and post with information, news, and offers on our products and services. You will not be sent any unlawful marketing or spam. We will always work to fully protect your rights and comply with our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and you will always have the opportunity to opt-out.

For more information on our lawful basis and legitimate business uses please refer to our Data Protection Policy.

7. How long will you keep my personal data?

We will not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Your personal data will therefore be kept as detailed in our Data Retention Policy.

8. How and where do you store or transfer my personal data?

We may store or transfer some or all of your personal data in countries that are not part of the European Economic Area (the "EEA" consists of all EU member states, plus Norway, Iceland, and Liechtenstein). These are known as "third countries" and may not have data protection laws that are as strong as those in the UK and/or the EEA. This means that we will take additional steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR as follows:

We share your data with external third parties, as detailed below in Part 9, that are based outside of the EEA. The following safeguards are applied to such transfers:

We will only transfer your personal data to countries that the European Commission has deemed to provide an adequate level of personal data protection. More information is available from the European Commission.

Please contact us using the details below in Part 11 for further information about the particular data protection mechanism used by us when transferring your personal data to a third country.

The security of your personal data is essential to us, and to protect your data, we take a number of important measures, including the following:

- Secure servers based in the EU
- Encrypting our data
- Providing a secure location to upload key information to prevent being attached to emails
- Staff training on data security
- Internal governance structure that includes technical and organisational measures that ensure compliance with GDPR.

9. Do You Share My Personal Data?

We may share your personal data with other companies in our group for advice purposes.

We provide advice relating to third party products and services via companies with whom you will contract with directly to share your data, however in some cases we are asked to confirm or validate this data for example policy numbers when we place trades on your behalf, we may also transmit the applications you make to them on your behalf.

If any of your personal data is required by a third party as described above, we will take steps to ensure that your personal data is handled safely, securely, and in accordance with your rights, our obligations, and the third party's obligations under the law, as described above in Part 8.

If any personal data is transferred outside of the EEA, we will take suitable steps in order to ensure that your personal data is treated just as safely and securely as it would be within the UK and under the GDPR. As explained above in Part 8, we share data with third party providers in the Isle of Man, Switzerland and Guernsey which are considered to have robust regimes comparable to those within the EEA.

In some limited circumstances, we may be legally required to share certain personal data, which might include yours, if we are involved in legal proceedings or complying with legal obligations, a court order, or the instructions of a government authority.

10. How Can I Access My Personal Data?

If you want to know what personal data we have about you, you can ask us for details of that personal data and for a copy of it (where any such personal data is held). This is known as a "subject access request".

All subject access requests should be made in writing and sent to the email or postal address shown in Part 11. To make this as easy as possible for you, a Subject Access Request Form is available for you to use. You do not have to use this form, but it is the easiest way to tell us everything we need to know to respond to your request as quickly as possible.

There is not normally any charge for a subject access request. If your request is 'manifestly unfounded or excessive' (for example, if you make repetitive requests) a fee may be charged to cover our administrative costs in responding.

We will respond to your subject access request within one month and, in any case, not more than two months from receiving it. Normally, we aim to provide a complete response, including a copy of your personal data within that time. In some cases, however, particularly if your request is more complex, more time may be required up to a maximum of two months from the date we receive your request. You will be kept fully informed of our progress.

11. How Do I Contact You?

To contact us about anything to do with your personal data and data protection, including to make a subject access request, please use the following details (for the attention of Georgina Eldridge):

Email address: georgina.eldridge@chasebuchanan.com

Telephone number: +44 (0)1252 852045

Postal Address: 2 St Georges Yard, Castle Street, Farnham, Surrey GU9 7LW, UK.

12. Changes to this Privacy Notice

We may change this Privacy Notice from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects personal data protection. Any changes to this document will be made available immediately on our website.