

1. Introduction

This Policy sets out the obligations of Chase Buchanan Ltd, a company registered in Cyprus under number HE343180, and Chase Buchanan Insurance Services, Agents & Advisors Ltd, a company registered in Cyprus under number HE370271, whose registered offices are: Office 101, 2nd Floor, 1 Nikou Kazantzaki, Paphos 8035, Cyprus (“the Company”) regarding data protection and the rights of our clients (“data subjects”) in respect of their personal data under EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

The GDPR also addresses “special category” personal data (also known as “sensitive” personal data). Such data includes, but is not necessarily limited to, data concerning the data subject’s race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation.

Under the GDPR, personal data shall be kept in a form which permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. In certain cases, personal data may be stored for longer periods where that data is to be processed for archiving purposes that are in the public interest, for scientific or historical research, or for statistical purposes (subject to the implementation of the appropriate technical and organisational measures required by the GDPR to protect that data).

In addition, the GDPR includes the right to erasure or “the right to be forgotten”. Data subjects have the right to have their personal data erased (and to prevent the processing of that personal data) in the following circumstances:

- a) Where the personal data is no longer required for the purpose for which it was originally collected or processed (see above);
- b) When the data subject withdraws their consent;
- c) When the data subject objects to the processing of their personal data and the Company has no overriding legitimate interest;
- d) When the personal data is processed unlawfully (i.e. in breach of the GDPR);
- e) When the personal data has to be erased to comply with a legal obligation; or
- f) Where the personal data is processed for the provision of information society services to a child.

This Policy sets out the type(s) of personal data held by the Company for advice and transaction purposes, the period(s) for which that personal data is to be retained, the criteria for establishing and reviewing such period(s), and when and how it is to be deleted or otherwise disposed of.

For further information on other aspects of data protection and compliance with the GDPR, please refer to the Company’s Data Protection Policy.

2. Aims and Objectives

- 2.1 The primary aim of this Policy is to set out limits for the retention of personal data and to ensure that those limits, as well as further data subject rights to erasure, are complied with. By extension, this Policy aims to ensure that the Company complies fully with its obligations and the rights of data subjects under the GDPR.
- 2.2 In addition to safeguarding the rights of data subjects under the GDPR, by ensuring that excessive amounts of data are not retained by the Company, this Policy also aims to improve the speed and efficiency of managing data.

3. Scope

- 3.1 This Policy applies to all personal data held by the Company for the purposes of giving financial advice and transacting on that advice and by third-party data processors processing personal data on the Company’s behalf.
- 3.2 Personal data, as held by the Company is stored in the following ways and in the following locations:
 - a) The Company’s servers, located in UK/EEA.
 - b) Third-party servers, operated by Microsoft and Apple and located in the EEA.
 - c) Computers permanently located in the Company’s premises at various locations within the EEA, please refer to our office locations list on our website.
 - d) Laptop computers and other mobile devices provided by the Company to its employees;
 - e) Computers and mobile devices owned by employees, agents, and subcontractors used in accordance with the Company’s Bring Your Own Device (“BYOD”) Policy;
 - f) Physical records stored in various EEA locations; please refer to our office location list.

4. Data Subject Rights and Data Integrity

All personal data held by the Company is held in accordance with the requirements of the GDPR and data subjects’ rights thereunder, as set out in the Company’s Data Protection Policy.

- 4.1 Data subjects are kept fully informed of their rights, of what personal data the Company holds about them, how that personal data is used as set out in Parts 12 and 13 of the Company’s Data Protection Policy, and how long the Company will hold that personal data (or, if no fixed retention period can be determined, the criteria by which the retention of the data will be determined).
- 4.2 Data subjects are given control over their personal data held by the Company including the right to have incorrect data rectified, the right to request that their personal data be deleted or otherwise disposed of (notwithstanding the retention periods otherwise set by this Data Retention Policy), the right to restrict the Company’s use of their personal data, the right to data portability, and further rights relating to automated decision-making and profiling, as set out in Parts 14 to 20 of the Company’s Data Protection Policy.

5. Technical and Organisational Data Security Measures

5.1 The following technical measures are in place within the Company to protect the security of personal data. Please refer to Parts 22 to 26 of the Company's Data Protection Policy for further details:

- a) All emails containing personal data must be encrypted;
- b) All emails containing personal data must be marked "confidential";
- c) Personal data may only be transmitted over secure networks;
- d) Personal data may not be transmitted over a wireless network if there is a reasonable wired alternative;
- e) Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself and associated temporary files should be deleted;
- f) Where personal data is to be sent by facsimile transmission the recipient should be informed in advance and should be waiting to receive it;
- g) Where personal data is to be transferred in hardcopy form it should be passed directly to the recipient or sent using registered or recorded delivery or a secure courier service.
- h) All personal data transferred physically should be transferred in a suitable container marked "confidential";
- i) No personal data may be shared informally and if access is required to any personal data, such access should be formally requested from Georgina Eldridge, Data Protection Officer, georgina.eldridge@chasebuchanan.com
- j) All hardcopies of personal data, along with any electronic copies stored on physical media should be stored securely;
- k) No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Company or not, without authorisation;
- l) Personal data must be handled with care at all times and should not be left unattended or on view;
- m) Computers used to view personal data must always be locked before being left unattended;
- n) No personal data should be stored on any mobile device, whether such device belongs to the Company or otherwise without the formal written approval of Georgina Eldridge, Data Protection Officer, georgina.eldridge@chasebuchanan.com and then strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary;
- o) No personal data should be transferred to any device personally belonging to an employee and personal data may only be transferred to devices belonging to agents, contractors, or other parties

working on behalf of the Company where the party in question has agreed to comply fully with the Company's Data Protection Policy and the GDPR;

- p) All personal data stored electronically should be backed up at regular intervals with backups stored onsite or offsite. All backups should be encrypted;
- q) All electronic copies of personal data should be stored securely using passwords and encryption;
- r) All passwords used to protect personal data should be changed regularly and must be secure;
- s) Under no circumstances should any passwords be written down or shared. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;
- t) All software should be kept up-to-date. Security-related updates should be installed as soon as reasonably possible after becoming available;
- u) No software may be installed on any Company-owned computer or device without approval; and
- v) Where personal data held by the Company is used for marketing purposes, it shall be the responsibility of Georgina Eldridge, Data Protection Officer, to ensure that the appropriate consent is obtained and that no data subjects have opted out, whether directly or via a third-party service such as the TPS.

5.2 The following organisational measures are in place within the Company to protect the security of personal data. Please refer to Part 27 of the Company's Data Protection Policy for further details:

- a) All employees and other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under the GDPR and under the Company's Data Protection Policy;
- b) Only employees and other parties working on behalf of the Company that need access to, and use of, personal data in order to perform their work shall have access to personal data held by the Company;
- c) All employees and other parties working on behalf of the Company handling personal data will be appropriately trained to do so;
- d) All employees and other parties working on behalf of the Company handling personal data will be appropriately supervised;
- e) All employees and other parties working on behalf of the Company handling personal data should exercise care and caution when discussing any work relating to personal data at all times;
- f) Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed;

- g) The performance of those employees and other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed;
 - h) All employees and other parties working on behalf of the Company handling personal data will be bound by contract to comply with the GDPR and the Company's Data Protection Policy;
 - i) All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that any and all relevant employees are held to the same conditions as those relevant employees of the Company arising out of the GDPR and the Company's Data Protection Policy;
 - j) Where any agent, contractor or other party working on behalf of the Company handling personal data fails in their obligations under the GDPR and/or the Company's Data Protection Policy, that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.
- 7.4 If a precise retention period cannot be fixed for a particular type of data, criteria shall be established by which the retention of the data will be determined, thereby ensuring that the data in question, and the retention of that data, can be regularly reviewed against those criteria.
 - 7.5 Notwithstanding the following defined retention periods, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made within the Company to do so (whether in response to a request by a data subject or otherwise).
 - 7.6 In limited circumstances, it may also be necessary to retain personal data for longer periods where such retention is for archiving purposes that are in the public interest, for scientific or historical research purposes, or for statistical purposes. All such retention will be subject to the implementation of appropriate technical and organisational measures to protect the rights and freedoms of data subjects, as required by the GDPR.

6. Data Disposal

Upon the expiry of the data retention periods set out below in Part 7 of this Policy, or when a data subject exercises their right to have their personal data erased, personal data shall be deleted, destroyed, or otherwise disposed of as follows:

- 6.1 Personal data stored electronically (including any and all backups thereof) shall be deleted securely;
- 6.2 Special category personal data stored electronically (including any and all backups thereof) shall be deleted securely;
- 6.3 Personal data stored in hardcopy form shall be shredded.

7. Data Retention

- 7.1 As stated above, and as required by law, the Company shall not retain any personal data for any longer than is necessary in light of the purpose(s) for which that data is collected, held, and processed.
- 7.2 Different types of personal data, used for different purposes, will necessarily be retained for different periods (and its retention periodically reviewed), as set out below.
- 7.3 When establishing and/or reviewing retention periods, the following shall be taken into account:
 - a) The objectives and requirements of the Company;
 - b) The type of personal data in question;
 - c) The purpose(s) for which the data in question is collected, held, and processed;
 - d) The Company's legal basis for collecting, holding, and processing that data;
 - e) The category or categories of data subject to whom the data relates;

The following personal data is collected, processed, and retained by the Company to satisfy its legal obligations under the AML Law 13(I)/2018 and AML Directive DI144– 2007–08 of 2012 for the establishment of clients' economic profiles, the prevention of money-laundering and for AML risk classification, and its record-keeping obligations under Delegated Regulation and Law 87(I)/2017.

| TYPE OF DATA | PURPOSE OF DATA | RETENTION PERIOD OR CRITERIA |
|---|--|--|
| Name, Date of Birth, Gender | To satisfy above quoted legislation as well as the regulatory requirement to give best advice | 5 years for AML purposes and 5 years from end of policy / contract |
| Contact Details (address / phone / email / Skype ID) | To satisfy above legislation | 5 years for AML purposes and 5 years from end of policy / contract |
| ID copies | To satisfy above legislation | 5 years for AML purposes and 5 years from end of policy / contract |
| Economic data | To satisfy above quoted legislation as well as the regulatory requirement to give best advice | 5 years for AML purposes and 5 years from end of policy / contract |
| Relationship status | To satisfy the regulatory requirement to give best advice | 5 years for AML purposes and 5 years from end of policy / contract |
| Nationality | To satisfy above legislation | 5 years for AML purposes and 5 years from end of policy / contract |
| Passport / Identity Card | To satisfy above legislation | 5 years for AML purposes |
| National Insurance / Social Security / Tax Reference No. | To satisfy above legislation | 5 years for AML purposes |
| Employment and income details | To satisfy the regulatory requirement to give best advice | 5 years from end of policy / contract |
| Bank / Investment holdings / source of funds | To satisfy above quoted legislation as well as the regulatory requirement to give best advice | 5 years for AML purposes and 5 years from end of policy / contract |
| Pension policies | To satisfy the regulatory requirement to give best advice | 5 years from end of policy / contract |
| Protection policies | To satisfy the regulatory requirement to give best advice | 5 years from end of policy / contract |
| Property information | To satisfy the regulatory requirement to give best advice | 5 years from end of policy / contract |
| Children under age 16: names, dates of birth, School fee info | To satisfy the regulatory requirement to give best advice, where advice has been sought on school fees planning, investing for a child, protection needs, inheritance tax planning | 5 years from end of policy / contract |
| Personnel Name and Date of Birth, Gender | For employment and legal purposes | 5 years from end of contract |
| Personnel Contact Details | For employment and legal purposes | 5 years from end of contract |
| Nationality | For employment and legal purposes | 5 years from end of contract |
| Health Record | For employment and Health and Safety purposes | 5 years from end of contract |
| Employment Record | For employment, regulatory and legal purposes | 5 years from end of contract |
| Criminal Background Check | For employment and regulatory purposes | 5 years from end of contract |
| Financial Background Check | For employment and regulatory purposes | 5 years from end of contract |

Jan 2022