

Doxbond (Isle of Man) Limited

Privacy Policy (version 2, January 2020)

INTRODUCTION

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

A “data controller” is responsible for deciding how to hold and use personal data. Personal data is information or data from which you can be identified and is about you. Doxbond (Isle of Man) Ltd (“the Company”) is therefore a “data controller” in relation to the personal data that we receive in connection with your instructions for the provision of our services. We are required under data protection legislation to notify you of the information contained in this privacy notice and it is important that you understand it. If there is anything in this notice that you do not understand, please speak to our Customer Services team who can be contacted via email storage@doxbond.com

THE INFORMATION THAT WE HOLD ABOUT YOU

In order that we can provide our services to you, we will collect, store, and use some or all of the following categories of personal information about you depending on your instructions and the services provide:

Category	Examples
Personal Contact Details	Name, title, addresses, telephone numbers, personal email addresses
Biographical Data	Date of birth, gender, marital status, dependants
Financial Data	Bank account details, payroll records, National Insurance number, tax status information

We do not normally collect, store or use more Sensitive Personal Data or “special categories of data” as it is known under the GDPR. Sensitive Personal Data requires a higher level of protection, and includes:

Special Categories of Data – or Sensitive Personal Data
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- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records.
- Biometric data.
- Information about criminal convictions and offences.

HOW DO WE COLLECT AND USE YOUR PERSONAL DATA?

We collect personal data about clients directly from clients.

Most commonly, we will use your personal data in the following circumstances:

1. Where we need to perform the contract we have entered into with you, in connection with the provision of our services.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal data in the following situations, which are likely to be rare:

1. Where we need to protect your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

We primarily need all the categories of personal data in the list above to enable us to perform our contract with you, provide services to you and to enable us to comply with legal obligations. The situations in which we anticipate we will process your personal data are listed below.

- Making a decision about our services.
- Determining the terms on which we work for you.
- Advising you.
- Administering the contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting reviews and managing performance.
- Making arrangements for the termination of our working relationship.
- Dealing with legal disputes involving you.
- To prevent fraud.
- To monitor your use of our information and communication systems.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal data.

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you, it may delay performance of that contract, or we may be prevented from complying with our legal obligations.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

SENSITIVE PERSONAL DATA

The law requires that we need to have further justification for collecting, storing and using Sensitive Personal Data as described above. We do not collect Sensitive Personal Data.

AUTOMATED DECISION-MAKING

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention.

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

DATA SHARING

We will share your personal data with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

“Third parties” includes third-party service providers. No activities are carried out by third-party service providers.

We will share your personal data with other entities in our group as part of our regular reporting activities on company performance, in the context of a business reorganisation or group restructuring exercise, for system maintenance support and hosting of data.

We may share your personal data with other third parties, for example in the context of the possible sale or restructuring of the business. We may also need to share your personal data with a regulator or to otherwise comply with the law.

DATA SECURITY

We have put in place a Data Protection Privacy Policy and appropriate security measures to protect the security of your information and prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes for which we collected it, 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. We currently retain personal data for a period of 7 years from the termination of the agreement between Us and You.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a client of the firm we will retain and securely destroy your personal information in accordance with our data retention policy.

YOUR DATA RIGHTS

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

Under certain circumstances, by law you have the right to:

- **Request access** to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see below). However, there may be reasons why we cannot agree a “request to be forgotten” or for data to be erased, such as where we need to retain it for regulatory or other reasons.
- **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction** of processing of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal data to another party.

If you want to review, verify, correct or request erasure of your personal data, object to the processing of your personal data, or request that we transfer a copy of your personal data to another party, please contact storage@doxbond.com in writing.

Depending on the circumstances, we may request information to confirm your identity before processing your request. We may also charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Company Secretary, Doxbond (IOM) Ltd, Unit 37 Snugborough Trading Estate, Braddan, Isle of Man IM4 4LH. Once we have received notification that you have withdrawn your consent, we will no longer process your data for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so.

RESPONSIBILITY FOR DATA PROTECTION

We have appointed a Data Protection leader to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal data, please contact the Company Secretary, Doxbond (IOM) Ltd, Unit 37 Snugborough Trading Estate, Braddan, Isle of Man IM4 4LH. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), for data protection issues.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

The latest version of this privacy notice will always be available at <http://www.doxbond.com>

If you have any questions about this privacy notice, please contact the Company Secretary, Doxbond (IOM) Ltd, Unit 37 Snugborough Trading Estate, Braddan, Isle of Man IM4 4LH.