Privacy Notice – Cash Transmission Services

Isle of Man Post Office
The contact details for the Isle of Man Post Office (IOMPO) are Isle of Man Post Office, Postal Headquarters, Spring Valley Industrial Estate, Douglas, Isle of Man IM2 1AA.

This is a Class 8 (Money Transmission Services) regulated activity under the Financial Services Act 2008.

In addition to the information set out in the IOMPO privacy notice, we may also collect the following information about you in particular where Anti-Money Laundering (AML) checks are required:

Account reference number

As the service is subject to Anti-Money Laundering (AML) Regulations, additional personal data is captured on the completed 'new customer account application form'. This includes:

- Name of company
- Registered Company address
- Parent company name, address and country
- Company Registration number
- VAT Registration number
- Directors/beneficial owner's names
- Ultimate beneficial owner country of residence
- Politically Exposed Persons (PEPs) status
- Bank Details (account name, sort code and number)
- Permanent residential address and postcode
- Verification of Identity (photo ID such as driving licence or passport)
- Verification of Address (such as utility bill)
- Trade references
- Bank reference
- Certification of Incorporation
- Contact details (telephone, email)
- Signature

How we will use the information, we collect about you
IOMPO will use your information to:

- provide cash transmission and exchange services at Post Office counters to business account customers
- help prevent and detect crime
- conduct and gather AML information and checks (please see separate privacy notice for AML).
- ensure compliance with legislation

IOMPO has a legal obligation to check and verify the data you provide to us for the provision of cash transmission and exchange services at Post Office counters to Business customers. This may include checks of publicly available information but in some cases, where it is necessary and relevant to your counter service, the information you provide may be disclosed or shared with other organisations.

This will only be done where there is a legal obligation for us to do so. We will do this to allow us to:

- Verify the information and documentation you have provided is correct
- Help prevent and detect crime including fraud, money laundering, identity theft or other criminal offences.

How we will share the information we collect about you
Third parties we may share your data with include:

- Police or law enforcement agencies where there is a legal requirement to do so
- Financial Services Authority, where there is a legal requirement to do so
- Courts on production of a valid court order
- Fraud prevention agencies

Information obtained or disclosed by third parties will not be used for any other purpose other than in order to comply with AML obligations.

Failure to meet AML obligations, in particular the processing of additional personal data for the completion of a 'new customer account application form', will mean that the services cannot be provided.

Protecting your information
Isle of Man Post Office will:

- Keep your information safe and secure in compliance with its information security policy
- Only use and disclose your information as detailed above, where necessary
- Only authorised staff are able to view your data
- Only hold your data on servers that are under the control of the Isle of Man Post Office and within the jurisdiction of the Isle of Man
- Retain the information for no longer than is necessary and your information will be permanently deleted once the timeframes set out below have been reached.

More information
You can find out more information including:

- Looking at the Isle of Man Post Office Privacy Notices
- Asking to see your information or making a complaint if you feel that your information is not being handled correctly

Your rights
Right of access to personal information
Isle of Man Post Office will provide any individual with access to their personal data upon request, unless, and to the extent necessary, that the right of access is restricted. Further details can be found on the IOMPO Privacy Notices webpage or by contacting the IOMPO Data Protection Officer.

Other rights
If we do hold information about you, you can ask us to correct any mistakes. You also have the right, subject to any statutory limitations, to object to processing, to erasure or restriction of processing, and to data portability. No automated decisions, or profiling, are undertaken by the Isle of Man Post Office.

To make any request relating to your data held by IOMPO please contact the Data Protection Officer;

By post:	Isle of Man Post Office, Postal Headquarters, Spring Valley Industrial Estate, Douglas, Isle of Man IM2 1AA
By email:	dpo@iompost.com
By telephone:	01624 698485

If you are not satisfied with the response you receive, you may also complain to the Information Commissioner, whose details can be found on www.inforights.im, or the relevant supervisory authority. You may have a right to other remedies.

Isle of Man Post Office - Retention Periods

Categories of personal data / document type	Retention Periods
Account reference number Name of company Registered Company address Parent company name, address and country Company Registration number VAT Registration number Director/beneficial owner's names Ultimate beneficial owner country of residence PEPs status Bank Details (account name, sort code and number) Permanent residential address and postcode Verification of Identity (photo ID such as driving licence or passport) Verification of Address (such as utility bill) Trade references Bank reference Certification of Incorporation Contact details (telephone, email) Signature	Legislation requires all data captured for Anti Money Laundering purposes to be kept for a period of 5 years beginning on the date on which — (i) the business relationship was formally ended; or (ii) if the business relationship was not formally ended, when all activities relating to the relationship were completed. There are circumstances where it may require that the data is retained for a longer period i.e. in the event that a matter is under investigation by a competent authority.

Will this privacy notice change?

This privacy notice may change. We will not reduce your rights under this privacy notice without your consent. If any significant change is made to this privacy notice, we will provide a prominent notice on this website so that you can review the updated privacy notice.

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