

Privacy Notice – Anti Money Laundering (AML) Procedures

Isle of Man Post Office - Controller

Isle of Man Post Office (IOMPO) is a controller for all personal data processed by the IOMPO, staff or other appointed Officers for the purposes of the General Data Protection Regulation (Isle of Man) Order 2018. The contact details for the IOMPO are Isle of Man Post Office, Postal Headquarters, Spring Valley Industrial Estate, Douglas, Isle of Man IM2 1AA.

In addition to the information set out in the IOMPO privacy notice, we may also collect the following information about you:

- Full Name
- Address
- Date of Birth
- Telephone Number
- Photographic ID
- Proof of address which would include relevant account/reference numbers

How we will use the information we collect about you

IOMPO will use your information to allow us to detect and prevent:

- fraudulent activity including sharing personal data with fraud prevention agencies; and
- money laundering activity or terrorist financing.

IOMPO has a legal, contractual and statutory obligation to check and verify the data you provide to us in order for us to process the following: -

- Cheque Cashing
- Bill Payments
- Private Box *
- Cash Transmission *
- Redirection *
- Foreign Exchange transactions (documentation required dependent on value of transaction) *
- Cash transactions (excluding forex) £650 and above.
- Cheque and debit card transactions (excluding Forex) £5000 and above

* Refer to separate Privacy Notice

This may include checks of publicly available information but in some cases, where it is necessary and relevant, the information you provide may be disclosed or shared with other organisations. This will only be done where there are Legal, and Contractual obligation for IOMPO to do so, this will allow IOMPO to:

- Process cash, cheque and debit card transactions,
- Process Foreign Exchange transactions
- 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, for example:

- 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

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 permit authorised staff to view your data
- 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

Transfer of information outside the EEA

Where we transfer your personal data outside the EEA, we will ensure that it is protected in a manner that is consistent with how your personal data will be protected by us in the EEA. This can be done in a number of ways, for instance:

- the country that we send the data to might be approved by the European Commission or a relevant data protection authority;
- the recipient might have signed up to a contract based on “model contractual clauses” approved by the European Commission, obliging them to protect your personal data; or

In other circumstances the law may permit us to otherwise transfer your personal data outside the EEA. In all cases, however, we will ensure that any transfer of your personal data is compliant with data protection law.

You can obtain more details of the protection given to your personal data when it is transferred outside the EEA (including a copy of the standard data protection clauses which we have entered into with recipients of your personal data) by contacting us (details below).

More information

You can find out more information including:

- Looking at the Isle of Man Post Office www.iompost.com/privacy-notice/
- 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
<p>Information required is dependent on value and type of transaction and will be more than one but not all of those listed below:</p> <p>Full name Former names Gender Address Contact details (phone, email) Date and place of birth Nationality Signature</p> <p>Counter clerks name and signature</p> <p><u>Photographic identification documents including issuer and number, copies of which may need to be taken and retained:</u> Current Valid Passport Current National ID card Armed Forces ID card Current Valid Driving Licence (full or provisional) Known Employer ID card Birth Certificate (minors only)</p> <p>Ultimate beneficial owner country of residence (<i>businesses only</i>) Politically Exposed Persons (PEPs) status</p> <p><u>Proof of address documents including issuer and reference copies of which may need to be taken and retained:</u> Recent Account Statement Recent Rates or Utility Bill Recent Correspondence from Government Department Legal Document recognising title to property Tenancy Agreement</p>	<p>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 —</p> <p>(a) all activities relating to an occasional transaction or a series of linked transactions were completed; or</p> <p>(b) in respect of all other activities —</p> <p>(i) the business relationship was formally ended; or</p> <p>(ii) if the business relationship was not formally ended, when all activities relating to the relationship were completed.</p> <p>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.</p>

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.

Date of Issue: 14/04/2022

This version issued: 30/07/2024

Version control: 2.1