

## Privacy Notice - Foreign Exchange Transactions

### 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.

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:

- Gender
- Full name
- Former Names
- Address
- Email address
- Telephone Number
- Date of Birth
- Place of Birth
- Nationality
- Source of Funds
- Payment card details (not retained)
- Photographic identification, including name of issuer and reference/identity number
- Address verification, including name of issuer and reference/identity number

### How we will use the information we collect about you

IOMPO will use your information to:

- provide counter service where customers can purchase or sell foreign currency
- advise you when your currency will be available for collection or the day it will be delivered to you
- 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. This may include checks of publicly available information but in some cases, where it is necessary and relevant to your transaction, the information you provide may be disclosed or shared with other organisations.

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

- Allow personal data to be collected in the Foreign Exchange system.
- Verify the information and documentation you have provided is correct
- Help prevent and detect crime including fraud, money laundering, identity theft or other
- The personal data for a foreign currency purchase or sale is processed to comply with all AML obligations and provide the necessary information to allow the delivery of the currency.

### 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
- Essiel, providers to IOMPO of the Foreign Exchange transactions platform. Their privacy notice can be viewed at <https://essiell.com/privacy-policy>
- WorldPay, to process your payment card payments. When you submit your transaction for processing by WorldPay you confirm your acceptance of WorldPay's shopper privacy policy, a copy of which can be viewed at [online.worldpay.com/terms/privacy](https://online.worldpay.com/terms/privacy).

### 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

- Privacy notice review 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

Both WorldPay and Essiel state that your data may be transferred outside the EEA. Full details are contained within their privacy notices.

### More information

You can find out more information including:

- Looking at the Isle of Man Post Office Privacy Notices at [www.iompost.com/privacy-notices/](http://www.iompost.com/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](mailto: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](http://www.inforights.im), or the relevant supervisory authority. You may have a right to other remedies.

### Retention Periods

Categories of personal data / document type	Retention Periods
<p><i>Information required is dependent on value of transaction:</i></p> <p>Gender Full name Former Names Address Telephone Number Email address Date of Birth Place of Birth Nationality Source of Funds Verification of Address Photographic ID Payment card details</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>(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> <p>Exceptions to this are:</p> <ul style="list-style-type: none"> <li>- Email correspondence retained for a maximum of six months</li> <li>- Foreign exchange order forms retained for six weeks then destroyed</li> <li>- Digital records (other than emails) retained for a maximum of six months</li> <li>- Payment card slip retained for a maximum of two months in case of query (full card details are not retained).</li> </ul>

**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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