

## **ISLE OF MAN WEALTH & FUND SERVICES ASSOCIATION PRIVACY POLICY**

This Privacy Policy sets out details of the personal information that we may collect from or about you and how we use that information.

Please take your time to read this Privacy Policy carefully. Where you are providing us with personal data concerning another person, you should provide them with a copy of this Privacy Policy.

This Privacy Policy is divided into the following sections:

1. Who we are and how to contact us
2. What personal information we collect and why we collect it
3. When we obtain your personal information
4. The purposes for which your personal information is used
5. Change of purpose
6. How we share your personal information
7. Sending information overseas
8. What marketing activities do we carry out?
9. How long do we keep your personal information for?
10. Your duty to inform us of changes
11. Your rights
12. How we protect your personal information
13. What we may need from you
14. Changes to this Privacy Policy

### **1. WHO WE ARE AND HOW TO CONTACT US**

In this Privacy Policy references to **we** or **us** are references to the Isle of Man Wealth & Fund Services Association, a not-for-profit unincorporated association acting through a committee of volunteers.

You can contact us by:

Post: Isle of Man Wealth & Fund Services Association c/o 33-37 Athol Street, Douglas, Isle of Man IM1 1LB

Email: [info@iomfunds.com](mailto:info@iomfunds.com)

This Privacy Policy describes what personal information we may collect from you and about you and explains how and why we use your personal information.

The data protection supervisory authority in the Isle of Man is the Isle of Man Information Commissioner, whose website is: [www.inforights.im](http://www.inforights.im)

If you have any questions about how we collect, store or use your information, you may contact us at the address above. If you have any complaints regarding our use of your personal information, you can contact us at the address above or contact the Isle of Man Information Commissioner at the website address above or by telephone +44(0)1624 693260.

## **2. WHAT PERSONAL INFORMATION WE COLLECT AND WHY WE COLLECT IT**

The personal information that we collect will depend on our relationship with you.

We collect personal information that is necessary for us to function as an unincorporated association; to share information that is relevant to the industry with members; to plan and run events; to advertise our events; to advertise sponsorship opportunities; and to provide you with information about those events or any other information you have requested from us. We may also collect personal information from third parties to allow us to do this.

If you provide personal information to us about other people (e.g. your colleagues) you must provide them with a copy of this Privacy Policy.

### **Personal information**

We may require the following personal information about you:

- (a) name, email address and telephone number;
- (b) dietary requirements;
- (c) job title.

## **3. WHEN WE OBTAIN YOUR PERSONAL INFORMATION**

We collect personal information from a number of different sources including:

- directly from you or from someone else on your behalf;
- from Eventbrite or any other third party ticketing and/or registration platform we may use from time to time;
- from Facebook, LinkedIn and other websites and any other third party social media channels we may use from time to time.

## **4. THE PURPOSES FOR WHICH YOUR PERSONAL INFORMATION IS USED**

We will rely on the following legal grounds to process personal information about you:

- 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;
- where the use is necessary to establish, exercise or defend our legal rights;
- occasionally, where you have provided your explicit consent to our use of your personal information.

Key ways in which we use your personal information are set out below. For each of the following purposes, we process personal information because it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests:

- (a) To know who has attended or is due to attend our events
- (b) To maintain our membership records and seek membership renewals
- (c) To tell you about sponsorship opportunities
- (d) To manage our operations such as maintaining accounting records
- (e) To invite you to our annual general meeting or any other meeting of our members
- (f) To provide marketing information to you about our events

## 5. **CHANGE OF PURPOSE**

We will only use your personal information for the purposes for which we collect 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 information without your knowledge or consent, where this is required or permitted by law.

## 6. **HOW WE SHARE YOUR PERSONAL INFORMATION**

We may share your personal information with third parties for the following purposes:

- advising a speaker at one of our events about who has signed up to attend or who attended the event;
- sending you email messages through Mailchimp (a trading name of The Rocket Science Group LLC) or other message sending service;
- advising you of any industry related articles and legal and regulatory consultations;
- providing you with details of our events or partner events and notifying you about either important changes or developments to these events or to the Isle of Man Wealth & Fund Services Association; and

- responding to your enquiries and complaints.

The third parties we share your personal information with will have their own privacy policies. If you would like further information regarding the disclosures of your personal information, please see section 1 for our contact details.

We also disclose your information to the third parties listed below for the purposes described in this Privacy Policy. This might include:

- the police and other third parties or law enforcement agencies where reasonably necessary for the prevention or detection of crime;
- our insurers;
- credit card scheme providers (e.g. Visa or MasterCard); and
- our third party services providers such as IT suppliers and document management providers.

## 7. **SENDING INFORMATION OVERSEAS**

We do not generally send your information outside of the Isle of Man. If we (or third parties acting on our behalf) store or process information that we collect about you in countries outside the Isle of Man and the European Union (**EU**), we will take the required steps to ensure that your personal information is protected. Such steps may include placing the party we are transferring information to under contractual obligations to protect it to adequate standards. If you would like further information regarding the steps we take to safeguard your personal information, please contact us using the details set out in section 1.

## 8. **WHAT MARKETING ACTIVITIES DO WE CARRY OUT?**

We may provide you with information about our events or those of our partners.

An **unsubscribe** link appears in all our marketing emails. To unsubscribe from marketing emails sent by us, simply click on the link at any time. Alternatively, you can contact us to update your preferences by contacting us using the details at section 1. If you decide to unsubscribe we will continue where necessary to send you (non-marketing) service related communications.

## 9. **HOW LONG DO WE KEEP PERSONAL INFORMATION FOR?**

We will only store your personal information for as long as reasonably necessary to fulfil the purposes set out in this Privacy Policy and to comply with any regulatory and/or legal obligations. We keep details of our individuals who are representing our members until advised by that member firm that the individual is no longer approved. Following such notification, that individual's details are deleted.

For further information regarding how long your personal information will be kept, please see our contact details in see section 1.

## 10. **YOUR DUTY TO INFORM US OF CHANGES**

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

## 11. **YOUR RIGHTS**

Under data protection law you have the right to make certain requests in relation to the personal information that we hold about you. We will not usually make a charge for dealing with these requests. If you wish to exercise these rights at any time please contact us using the details set out in section 1.

There may be cases where we are not able to comply with your request (such as where this would conflict with our obligation to comply with other regulatory and/or legal requirements). However, if we cannot comply with your request, we will tell you the reason provided we are allowed to do so by law, and we will always respond to any request you make.

There may also be circumstances where exercising some of these rights (such as the right to erasure, the right to restriction of processing and the right to withdraw consent) will mean that you can no longer find out about or attend our events.

Your rights include:

### (a) **The right to access your personal information**

You are entitled to a copy of the personal information we hold about you and certain details of how we use it.

We will usually provide you with your information in writing, unless you request otherwise, or where you have made the request using electronic means, in which case the information will, where possible, be provided to you by electronic means.

### (b) **The right to rectification**

We take reasonable steps to ensure that information we hold about you is accurate and complete. However, you can ask us to amend or update it if you do not believe this is the case.

### (c) **The right to erasure**

You have the right to ask us to erase your personal information in certain circumstances, for example where you withdraw your consent or where the personal information we collected is no longer necessary for the original purpose. This will need to be balanced against other factors however. For example, we may have regulatory and/or legal obligations which mean we cannot comply with your request.

(d) **The right to restriction of processing**

In certain circumstances, you are entitled to ask us to stop using your personal information, for example where you think that we no longer need to use your personal information or where you think that the personal information we hold about you may be inaccurate.

(e) **The right to data portability**

You have the right, under certain circumstances, to ask that we transfer personal information that you have provided to us to another third party of your choice.

(f) **The right to object to marketing**

You can ask us to stop sending you marketing messages at any time. You can do this either by clicking on the "unsubscribe" link which is contained in any marketing email that we send to you or you can use the details set out in section 1 to contact us. If you opt out of receiving marketing messages, we may still send you (non-marketing) service related communications where necessary.

(g) **Rights relating to automated decision-making**

We do not generally use automated decision-making. You can contact us using the details set out in section 1 and ask us to review a decision if you have been subject to an automated decision and do not agree with the outcome.

(h) **The right to withdraw consent**

We may ask for your consent for certain uses of your personal information. Where we do this, you have the right to withdraw your consent to further use of your personal information.

(i) **The right to complain to the Isle of Man Information Commissioner**

You have a right to complain to the Information Commissioner if you believe that any use of your personal information by us is in breach of applicable data protection laws and/or regulations. More information can be found on the Isle of Man Information Commissioner's website: [www.inforights.im](http://www.inforights.im)

This will not affect any other legal rights or remedies that you have.

12. **HOW WE PROTECT YOUR INFORMATION**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those committee members and other third parties who have need to know, they will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from contacting us using the details at section 1 above.

13. **WHAT WE MAY NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is to ensure that personal information is not disclosed to any person who has no right to receive it.

14. **UPDATES TO THIS PRIVACY POLICY**

We reserve the right to make changes to this Privacy Policy, for example, as the result of government regulation, new technologies, or other developments in data protection law or privacy generally. You should check our website from time to time to view the most up-to-date Privacy Policy.

This Privacy Policy was last updated on: August 2020.