



HOTCHKISS ASSOCIATES

TAILORED TAX ADVISORY

PRIVACY NOTICE

This Privacy Notice sets out how Hotchkiss Associates Limited (Hotchkiss Associates), as a data controller, processes data. Whether on individuals (including personal data in respect of individuals who are clients, intermediaries or other third parties Hotchkiss Associates interact with, or any individual who is connected to those parties) or otherwise. This document also sets out the rights of those individuals in respect of their personal data.

We recommend you read this notice to ensure you are fully aware of who holds your data and your rights under the EU General Data Protection Regulation. If you have any questions in relation to this Privacy Notice or requests in respect of personal data please direct these to info@hotchkiss.im

Retention of personal data: Hotchkiss Associates processes data in order to provide tax advice. The type of data we may collect and process includes:

- Contact details (including names, postal addresses, email addresses and telephone numbers);
- Information in respect of AML (anti-money laundering) , including proof of wealth and source of funds;
- Financial information, such as payment related documentation;
- Verification of identity ie: KYC (know your client) a copy of passport/drivers licence/proof of address/tax status;

In accordance with Isle of Man regulations, we are required to retain data for 6 years from the end of the tax year to which the information relates, or from the date of our disengagement letter.

Data sharing: On occasion we may need to disclose your personal information to other professional bodies for the purposes of effectively managing your account and to fulfil our legal obligations, for example:

- Third parties with whom you permit us to correspond
- Law enforcement agencies, courts and tribunals
- HMRC & Information Commissioner's Office
- Financial Services Authority, Isle of Man

Rights of data subjects: Data subjects in the European Union (or jurisdiction with equivalent legislation) have the following rights;

- The right to withdraw their consent and/or complain to the Data Protection Supervisory Authority, Prospect House, Prospect Hill, Douglas, Isle of Man, IM1 1ET.
- The right of access to their data and instruct portability to a nominated 3rd Party.
- The right to have their data rectified, erased or restrict access to a 3rd Party.

However, in certain circumstances Hotchkiss Associates have the right to refuse the request for erasure and it may remain lawful for us to process your data on another legal basis.

This Privacy Notice will be kept under review and any updates will appear on our website at www.hotchkiss.im