



Privacy Policy

We respect the privacy of our customers and are registered with the Isle of Man Information Commissioner (Registered Number R002432). This policy applies to all our dealings with you, including our website.

Contents

1. Important information and who we are
2. The data we collect about you
3. How is your personal data collected?
4. How we use your personal data
5. Disclosures of your personal data
6. Data security
7. Data retention
8. Your legal rights
9. Glossary

Introduction

Welcome to our privacy notice.

We, at C. Tarleton Hodgson & Son Ltd., are committed to protecting your personal data. This privacy notice informs you about how we look after your personal data when you deal with us or visit our website and it tells you about your privacy rights and how the law protects you.

You can download a pdf version of the policy here www.cth.co.im

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

1. Important information and who we are

Purpose of this privacy notice

This privacy notice aims to give you information on how we collect and process your personal data during our dealings with you or through your use of our website, including any data you may provide through our website when you interact with us via the phone or otherwise deal with us in the course of our business.

Controller



C. Tarleton Hodgson & Son Ltd. is the controller of, and responsible for, your personal data (collectively referred to as "CTH", "we", "us" or "our" in this privacy notice).

We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

Contact details

The Data Protection Officer
St. Thomas House
30 Victoria Street
Douglas
Isle of Man
IM1 2LB

Telephone number: 01624 621206
E-mail: info@cth.co.im

You have the right to make a complaint at any time to the Isle of Man Information Commissioner's Office (ICO), the IOM's supervisory authority for data protection issues (www.inforights.im). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy notice and your duty to inform us of changes

This version was last updated on 5th October 2021.

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

Third-party links

Our website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes name, date of birth.
- **Contact Data** includes postal address, email address, contact telephone number, emergency contact number.



- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website.
- **Usage Data** includes information about how you use our website.
- **Communications Data** includes all correspondence that you may have with us whether by email or post or otherwise.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact, Correspondence and other Data by filling in forms on the website or by corresponding with us by post, phone, email or otherwise.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

4. How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you (i.e. where you wish us to obtain a quote or arrange insurance for you).
- Where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us on 01624 621206 or via info@cth.co.im if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing
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		including basis of legitimate interest
To obtain quotes or place insurance on your behalf.	(a) Identity (b) Contact (c) Details of vehicles and property you wish to insure	Performance of a contract with you
To contact you by phone	(a) Identity (b) Contact	Necessary for our legitimate interests
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy	(a) Identity (b) Contact (c) Profile (d) Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated)
To administer and protect our business and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, publications, customer relationships and experiences	(a) Identity (b) Usage	Necessary for our legitimate interests (to define types of customers for our website, to keep our website updated and relevant)

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of our website may become inaccessible or not function properly. For more information about cookies, please see below.



Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us 01624 621206 or via info@cth.co.im

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

5. Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties as set out in the Glossary.
- We do not sell your personal data to third parties.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

7. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.



In some circumstances you can ask us to delete your data: see Request erasure below for further information.

8. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please Contact us on 01624 or via info@cth.co.im

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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

9. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us

Performance of Contract means processing your data where it is necessary for the performance of a contract/service to which you are a party or to take steps at your request before entering into such a contract/service.



Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

External Third Parties

- Service providers acting as processors based in the Isle of Man and/or the United Kingdom who provide postal delivery services, IT support, cloud based data management services, data broking and data cleansing services.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.



Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.

Cookies

What are cookies?

Cookies are tiny text files which are downloaded onto your computer, tablet or mobile phone via your browser when you visit a website. They enable specific details about your visit to our website to be recorded, retrieved and analysed by our site during subsequent visits or by other sites that recognise the cookie. For further information on cookies visit www.aboutcookies.org

Cookies can't harm your computer and they don't identify individual users.

You can set your browser not to accept cookies and the above website tells you how to remove cookies from your browser. However, in some instances, some of our website features may not function as a result.

Pixels in our html emails

In order to improve the emails we send you, our html emails may contain a campaign-unique 'web beacon pixel'. The single pixel is deleted when an email is opened

As with cookies, the pixel doesn't harm your computer and it doesn't identify individual users. We currently only provide our emails in HTML format, so if you do not wish to receive the pixel, you would need to unsubscribe from our emails.

Future updates to our Privacy Policy

We're giving you this information as part of our initiative to comply with recent legislation, and to make sure we're honest and clear about your privacy when using our website and our services.

We monitor developments in privacy and cookie-related best practice closely and, if we think changes to our policy would be of benefit to you, we will make a change to our policy.

Author: R.K.Dowty

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