

Who we are:

Capurro Insurance & Investments Limited
20 Line Wall Road, P. O. Box 130, Gibraltar
Registered in Gibraltar, Company Registration Number 59715

1. Whose products do we offer?

We offer products from a range of different companies. This is limited only by the number of companies available in this market that we may submit business to. Please ask us for a list of companies and products we offer.

2. Which service will we provide you with?

INSURANCE (General and pure life)

We will provide you with objective information on the range of products that we offer from selected insurers. We may ask some questions to narrow down the selection of products that we will provide details on. You will then need to make your own choice about how to proceed.

SAVINGS, INVESTMENTS AND PENSIONS

On receipt of a fully completed fact find, we will provide initial advice and a personal recommendation. Advice is given on a fair and personal analysis of the market, allowing you to make an informed decision. We will give you what we consider to be the most suitable advice at that time, based on the information given by you.

Once we have arranged any financial planning products for which you have given us instructions, we will not give you further advice unless you request it, but will be glad to advise you at any time you ask us to do so. Please note that, since your situation may change with time, you should review this advice regularly.

Our Appointed Representatives do not offer any form of active management for investments. If this service is required, portfolio management services are available from professional investment managers (a fee is charged for this service). We can arrange this for you, if required.

3. What will you have to pay us for our services?

We normally derive income from commission paid to us by product providers in respect of transactions in insurance and financial services products. However, if we propose to charge you a fee, we will agree its basis with you before we carry out any chargeable work. We may receive additional remuneration from some Insurers based on the performance of the business that we place with them.

4. Who regulates us?

We are regulated and authorised by the Financial Services Commission, Gibraltar. We hold a permission, with Permission Number 9800, to carry out the below specified Regulated Activities in accordance with the Financial Services Act 2019:

- Taking up or pursuing insurance distribution (General Insurance);
- Taking up or pursuing insurance distribution (Life Insurance);
- Advising on personal or occupational pension schemes.

You may check this by visiting the FSC's website at www.fsc.gi or by contacting the FSC (Tel +350 200 40283).

5. What to do if you have a complaint.

If you should wish to register any complaint about the service that we have offered, please write to The Managing Director, at the address shown at the top of this page. Alternatively, send an e-mail to info@capurroinsurance.com. Please give the nature of your complaint, the policy or product that it refers to and the reason why you feel that our service has failed you.

We will acknowledge your complaint within two weeks of receiving it and give you a written response within twelve weeks. In the event that you are not satisfied with the way your complaint has been handled, you may wish to refer this to the Office of Fair Trading at Suite 975 Europort, Gibraltar.

DATA PROTECTION POLICY

Capurro Insurance & Investments Limited needs to collect and use personal data about people including past, present and prospective customers in order to carry on its business and meet its customers' requirements effectively. The personal type of information we collect about you may include: name, address, phone number, email, gender, marital status, date of birth, ID numbers, banking details, health information/medical history, criminal history, claims and policy numbers. We recognise that the lawful and correct treatment of personal data is very important to successful operations and to maintaining our customers' confidence.

Any personal data that we collect (via application processes, sanctions lists, government agencies or those involved in claims), record or use in any way, whether it is held on paper, on computer or other media, will have appropriate safeguards applied to it to ensure that we comply with the General Data Protection Regulation 2018 (GDPR).

Our purpose for collecting your personal information is to evaluate or underwrite insurance risks; handle or process insurance claims or provide financial planning advice. The data that we collect from you will be shared with insurance providers (insurance companies and specialist brokers), so that they may assist us in conducting our business and provide you with a service or assist us with the prevention of fraud. These service providers must also comply with the requirements of the GDPR. Occasionally some of these providers may be located outside of the European Economic Area (EEA). We will continue to protect any transferred personal information in keeping with all applicable privacy requirements. For more information, please contact the Data Protection Officer.

We will keep your personal information only so long as is necessary to provide service to you under your policy. Specifically, we will keep your information for so long as a claim may be brought under the policy, or where we are required to keep your personal information to satisfy legal or regulatory obligations.

There may be occasions when Capurro Insurance & Investments Ltd. may have to release specific personal information to the relevant authorities without your specific consent, as required by law.

Under the GDPR, any individual may write to our Data Protection Co-ordinator at the above address and request: a copy of the information held about them, to receive further details of the use we make of your information, to update or correct the personal information we hold about you, to require us to delete any personal information we no longer have a lawful purpose to use or to restrict our use of your personal information.

We are registered with the Gibraltar Data Protection Commissioner, who may be contacted at the Gibraltar Regulatory Authority.

If you believe that Capurro Insurance & Investments Ltd have breached your privacy rights or if you are not satisfied with our response to your concerns, you can contact the Gibraltar Data Protection Commissioner at the following address: Gibraltar Regulatory Authority, 2nd Floor, Eurotowers 4, 1 Europort Road, Gibraltar, or by e-mail at info@gra.gi

"TREATING CUSTOMERS FAIRLY" STATEMENT

We are dedicated to developing long term relationships with our clients and paying particular attention to each client's unique profile. Our procedures are intended to look after the best interests of our clients, who we are responsible to. The UK FCA principles of "Treating Customers Fairly" are already embedded in the culture of our firm.

As an independent Insurance Intermediary acting on behalf of our customers, we believe that "Treating Customers Fairly" is about:

- o Providing a flexible, tailored approach, putting the individual clients' needs first and offering innovative insurance products;
- o Being open about the way we carry out our business and how we are remunerated;
- o Providing a comprehensive service delivered in a clear and consistent manner, thus ensuring clients' understanding of what is being offered to them at all stages and welcoming regular feedback;
- o Having a cohesive team philosophy, blending experience with enterprise and continually encouraging and supporting staff to enhance their professional development.

We look at all areas of our business on a regular basis to ensure that:

- a. Clients can be confident that they are dealing with a firm where the fair treatment of clients is central to the culture;
- b. We consider our customers when promoting new services and products and ensure they are relevant to them;
- c. Our clients are provided with clear information and we keep them informed before, during and after the point of sale;
- d. Where advice is provided, we take time to understand our clients' situation and ensure that our advice is suitable and appropriate;
- e. We meet our clients' expectations, providing them with a level of service and products that are of an acceptable standard;
- f. We will ensure that our clients can switch providers, change products, surrender policies and make any complaints without any undue barriers.

While we are not required to make this statement, we are very happy to do so since it matches our firm's philosophy.