

# Privacy Notice Template Large

## Data Protection Privacy Notice

This notice explains what personal data (information) we hold about you, how we collect it, and how we use and may share information about you during your employment and after it ends. We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice' or 'privacy policy') (the '**Notice**') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

This Notice also explain what your rights are in relation to any personal data about you that is processed by us.

## Who collects the information?

trading as

('Company') is a 'data controller' and gathers and uses certain information about you.

This information is also used by our affiliated entities and group companies, namely

(our '**Group Companies**') and so, in this notice, references to '**We**', '**Us**' and/or '**Our**' mean the Company and our Group Companies.

## Relevant Law

The way in which we process personal data is governed by data protection law, which includes the Data Protection (Jersey) Law 2018 (the '**DPJL 2018**'), the Data Protection Authority (Jersey) Law 2018 (the '**Authority Law**') [and, where relevant, the General Data Protection Regulation (EU) 2016/679 ('**GDPR**')].

## Data protection principles

We will comply with the data protection principles when gathering and using personal information.

## What information

We process data in order to:

The type of information we collect includes:

- Your name, contact details (i.e. address, home and mobile phone numbers, email address) and emergency contacts (i.e. name, relationship and home and mobile phone numbers);
- Information collected during the recruitment process that we retain during your employment;
- Employment contract information;
- Details of salary and benefits, bank/building society, Social Security and tax information, your age;
- Details of your spouse/partner and any dependants;

- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information;
- A copy of your [driving licence][passport][Social Security registration card];
- Details of your share incentive arrangements, and all information included in these and necessary to implement and administer them;]
- Details of your pension arrangements, and all information included in these and necessary to implement and administer them;
- Information in your sickness and absence records (including sensitive personal information regarding your physical and/or mental health);
- Special category data such as information relating to your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs, criminal records information, including the results of Disclosure and Barring Service (DBS) checks;
- Your trade union membership;
- Information on grievances raised by or involving you;
- Information on conduct and/or other disciplinary issues involving you;
- Details of your appraisals and performance reviews;
- Details of your performance management/improvement plans (if any);
- Details of your time and attendance records;
- Information regarding your work output;
- Information in applications you make for other positions within our organisation;
- Information about your use of our IT, communication and other systems, and other monitoring information;
- Your image, in photographic [and video] form [including images captured by CCTV];
- Details of your use of business-related social media, such as LinkedIn;
- Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur); and
- Details in references about you that we give to others;
- If you have instructed Us to provide [**e.g. legal/trust/fund**] services (either on your own behalf or on behalf of your organisation), We will collect necessary contact details (including names, postal addresses, email addresses and telephone numbers);
- Information to meet legal and regulatory requirements and to allow Us to check and verify your identity prior to engagement, including information on source of funds and source of wealth;
- Information provided in the course of the provision of services (for example, information on professional relationships and background, disputes and court proceedings engaged in);
- We may collect information such as your business contact details if We meet you in person, or at a telephone, or online meeting (including images or video obtained during visits to events hosted by Us or in which We are involved);
- Any other information you may provide to Us including that which you provide by filling in the contact form on Our website.

## How we collect the information

### \*DELETE AS NECESSARY

#### \*Section A (Geared towards employees)

[We may collect this information from you, your personnel records, [pension administrators,] your doctors, from medical and occupational health professionals we engage and from our insurance benefit administrators, [the DBS and/or States of Jersey Police,][your trade union,] [other employees, ][consultants and other professionals we may engage, e.g. to advise us generally and/or in relation to any grievance, conduct appraisal or performance review procedure, ]

[automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and Internet facilities, telephones, voicemail, mobile phone records

[relevant websites and applications].

#### \*Section B (Geared towards professional services)

[We will usually collect most information from you directly. However, we may also collect information from:

- Publicly accessible sources, e.g. the Jersey Financial Services Commission website, the Public Registry or social media sites such as LinkedIn;
- From your colleagues or third-party business contacts who have referred you to us, or put you in touch with us;
- From other entities within our Group;
- From a third party with your consent (e.g. your bank or insurance provider).]

## Why we collect the information and how we use it

We will typically collect and use this information for the following purposes:

- For the performance of a contract with you, or to take steps to enter into a contract;
- For compliance with a legal obligation (e.g. our obligations to you as your employer under employment protection and health safety legislation);
- For the purposes of our legitimate interests or those of a third party (such as a benefits provider), but only if these are not overridden by your interests, rights or freedoms.
- Because it is necessary for carrying out obligations or exercising rights in employment law;
- For reasons of substantial public interest (equality of opportunity [and regulatory requirements]);
- To enter into client relationships and provide the services you have asked us to provide;
- To ensure the security of our computer systems and premises;
- To notify you about goods or services and updates about relevant industry developments and our services, which may be of interest to you.

[Further information on the monitoring we undertake in the workplace and how we do this is available in our

available from

We seek to ensure that our information collection and processing is always proportionate. We will notify you of any material changes to information we collect or to the purposes for which we collect and process it.

### **How we may share the information**

We will never sell your information or pass it to any third party for marketing purposes or for any other purpose unconnected with my business.

We may need to share some of the above information with other parties such as:

- Any sub-contractors, agents or professional service providers;
- Potential purchasers of some or all of our business or on a re-structuring;
- Courts or tribunals;
- Third parties with whom we engage for the hosting of events or other marketing initiatives;
- Law enforcement agencies where considered necessary for me to fulfil legal obligations applicable to it;
- Regulators or other governmental or supervisory bodies with a legal right to the material or a legitimate interest in any material.

[Information may be transferred internationally to [[identify any particular country that is relevant] and ] other countries around the world [, including countries that do not have data protection laws equivalent to those in Jersey], for the reasons described above.

Where we enter into an engagement with a third party pursuant to which data may be processed by that third party, we will impose contractual obligations on them to ensure that they are only allowed to use your information to complete the tasks we have asked them to carry out and that they take appropriate measures to protect your personal data.

We may also disclose your personal data to third parties:

- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce any agreement with you; or
- To protect our rights, property, or safety or that of our clients or any third party we interact with.

Other than as set out above, and save insofar as is necessary in order for us to carry out our obligations arising from any contracts entered into between us and you, we will not share your data with third parties unless we have procured your express consent to do so.

### **Where information may be held**

[Information may be held at our offices and those of our group companies, and third party agencies, service providers, representatives and agents as described above.]

[Information is stored on secure systems provided by our third party service provider within [Jersey/the UK/ the EU/the EEA etc.]

## How long we keep your information

We keep your information [during and after your employment] for no longer than is necessary for the purposes for which the personal information was collected.

[Further details on this are available in our [retention policy, which can be provided on request].]

## Your rights

Under data protection legislation, you have various rights in connection with any personal data about you that is processed by us as data controller. These include rights to:

- Access to your personal data and to certain other supplementary information that this notice is already designed to address;
- Require us to correct any mistakes in your information which we hold;
- Require the erasure of personal data concerning you in certain situations;
- Receive the personal data concerning you which you have provided to Us in a structured, commonly used and machine-readable format and have the right to transmit those data to a third party in certain situations;
- Object at any time to processing of personal data concerning you for direct marketing;
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;
- Object in certain other situations to our continued processing of your personal data;
- Otherwise restrict our processing of your personal data in certain circumstances; and
- Claim compensation for damages caused by our breach of any data protection laws.

Further information on those rights can be found on the website of the Jersey Office of the Information Commissioner: [www.jerseyoic.org](http://www.jerseyoic.org)

If you would like to exercise any of those rights, please call, [email](mailto:) or write to us. We are obliged to respond to your request.

## Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Our website may, from time to time, contain links to and from other websites including the websites of our clients or partners who have provided feedback or testimonials; industry-related websites such as:

or networking or social media websites such as LinkedIn and Twitter. If you follow a link to any of these websites, please note that these websites have their own privacy policies and terms of use and we do not accept any responsibility or liability for these policies and terms of use. Please check these policies before you submit any personal data to these websites.

## **How to complain**

You can also complain to the Jersey Office of the Information Commissioner (**JOIC**) if you are unhappy with how we have used your personal data.

### **JOIC's address:**

2nd Floor  
5 Castle Street  
St. Helier  
Jersey  
JE2 3BT

[enquiries@jerseyoic.org](mailto:enquiries@jerseyoic.org)

+44 (0) 1534 716530

## **Changes to this Notice**

We reserve the right to modify this notice at any time.

Any changes will be notified and made available via [www.jerseyoic.org](http://www.jerseyoic.org)

Last updated:

