

Fair Processing Notice

There is currently an emergency in the Bailiwick of Guernsey in connection with the threat to life and public health posed by the disease COVID-19. The States of Guernsey are using this online form in order to gain a better understanding the challenges people within the Bailiwick are facing at this time and, where possible, provide assistance to the community.

For the processing carried out by the Public Health Department in connection with this purpose, the controller is the Medical Officer of Health. The Policy and Resources Committee will also be a controller for any processing carried out for this purpose by the gov.gg website and the Office *of the* Policy and Resources Committee.

1. The Data Protection Law

The controller acknowledges its obligations as per the data protection law, which provides a number of requirements in terms of processing activities involving personal data. The controller further acknowledges the general principles of processing as well as the rights of a data subject and more information in relation to these provisions are provided within this fair processing notice.

2. The Principles of Processing

a. Lawfulness, fairness and transparency

Personal data must be processed lawfully, fairly and in a transparent manner.

The processing carried out on personal data submitted through this online gateway is necessary for the purpose of establishing and maintaining a strong understanding of how COVID-19 is affecting the Bailiwick and its inhabitants. The processing of this information will also assist the States of Guernsey in ensuring all islanders are supported and the difficulties associated with self-isolation are removed or eased wherever possible. The Public Health Department and the Office *of the* Policy and Resources Committee may also process this information for statistical purposes, in a suitably pseudonymised format, and also to contact you in connection with any additional support you may have indicated you required in your submission.

The following categories and types of personal data will be processed by the controllers in relation to this purpose:

- Basic personal data

- Name
- Email address
- Phone number
- Postcode
- Age
- Employment status
- Information relating to challenges you are facing
- Special category data
 - Health data

All personal data provided through this online form will be processed in accordance with the lawful basis set out in Section 1 and 18 of Schedule 2 of the Data Protection (Bailiwick of Guernsey) Law, 2017 ('the Law'), which state:

"The data subject has requested or given consent to the processing of personal data for the purpose for which it is processed"

and,

"The data subject has given explicit consent to the processing of the personal data for the purpose for which it is processed."

All personal data processed by the Public Health Department and the Office of the Policy and Resources Committee, through and in connection with this online gateway, has been directly collected from you as an individual.

The personal data collected through this online form will initially be sent to the Office of the Policy and Resources Committee and then securely forwarded onto the Public Health Department. The IT providers who support and maintain this service, Submarine – Internet Solutions, may have sight of elements of your personal data through the service they provide to the States of Guernsey for this purpose. Submarine are only permitted to support and maintain this online platform; as such, the processing they carry out on your personal data for this purpose will be limited and restricted. Your personal data will not be shared with any other third parties and will be subject to strict access controls to prevent your information being accessed without prior authorisation being granted.

b. Purpose limitation

Personal data must not be collected except for a specific, explicit and legitimate purpose and, once collected, must not be further processed in a manner incompatible with the purpose for which it was collected.

The controller acknowledges its responsibility with regards to this data protection principle and therefore the controller maintains that it will not further process that personal data in a way which is incompatible to its original reason for processing as specified in section 2a,

unless the controller is required to do so by law. The personal data will not be transferred to a recipient in an unauthorised jurisdiction (as per the definition within data protection law).

c. Minimisation

Personal data processed must be adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed.

The controller maintains that it will only process the personal data which is detailed in section 2a, and will not process any further personal data that is not necessary in relation to the original reason for processing personal data as specified in section 2a, unless the controller is required to do so by law.

d. Accuracy

Personal data processed must be accurate, kept up-to-date (where applicable) and reasonable steps must be taken to ensure that personal data that is inaccurate is erased or corrected without delay.

The controller will ensure that all personal data that it holds is accurate and kept up-to-date, and any personal data that is inaccurate will be erased or corrected without delay.

e. Storage limitation

Personal data must not be kept in a form that permits identification of a data subject for any longer than is necessary for the purpose for which it is processed.

The personal data you submit through any of the online survey forms, which are sent by email link, will be securely stored for a period of 6 months before being deleted. Your name and email address (which is used to email you the links to surveys) will be securely stored for a period of 6 months *either* after you unsubscribe *or* after you receive the last survey form before being deleted.

f. Integrity and confidentiality

Personal data must be processed in a manner that ensures its appropriate security, including protecting it against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Personal data may be held in both electronic and hard copy formats. Electronic data is held on secure States of Guernsey servers and hard copy data is stored in offices of the States of Guernsey.

Information Access - access to electronic or paper records is tightly controlled. Employees are vetted in a manner commensurate with the role that they are expected to undertake.

Protocols are followed to ensure that employees only have access to areas and documents as required to undertake their role. Access is monitored and effectively managed.

Information Security – The controllers adopt the information security standards of the States of Guernsey.

g. Accountability

The controller is responsible for, and must be able to demonstrate, compliance with the data protection principles.

3. Contact Details

The contact details of the joint controllers are as follows:

The Policy and Resources Committee

Sir Charles Frossard House, La Charotterie, St Peter Port, Guernsey, GY1 1FH

Tel: 01481 717000 / 01481 717240

Email: policyandresources@gov.gg / dataandanalysis@gov.gg

The contact details for the Data Protection Officer of the Policy and Resources Committee are as follows:

Data Protection Officer, the Policy and Resources Committee

Sir Charles Frossard House, La Charotterie, St Peter Port, Guernsey, GY1 1FH

Tel: 01481 717297

Email: data.protection@gov.gg

The Medical Officer of Health

Le Vauquiedor, Rue Mignot, St. Andrew. Guernsey. GY6 8TW.

Email: publichealth@gov.gg

Tel: 01481 725241

The contact details for the Data Protection Officer of the Committee *for* Health and Social Care are as follows:

Data Protection Officer, the Committee *for* Health and Social Care

Sir Charles Frossard House, La Charotterie, St Peter Port, Guernsey, GY1 1FH

Tel: 01481 717297

Email: data.protection@gov.gg

For information on your rights as a data subject under the Data Protection (Bailiwick of Guernsey) Law, 2017, please go to the following link: <https://gov.gg/dp>