

# Privacy Policy

## GENERAL

This statement explains the personal information we collect from you and how we will use it. Personal information is any information that can be used to identify you or that we can link to you. The statement also elaborates on the choices you can make about the data we collect, and how you can control these decisions. Please read this statement to understand how Guernsey Community Savings LBG may collect, use and share your personal information. This policy is written in accordance with the Data Protection (Bailiwick of Guernsey) Law 2017.

## WHO WE ARE

Guernsey Community Savings is a non-profit charitable organisation established to assist individuals to access a basic financial account service. In addition, we provide guidance on financial budgeting.

## OUR PROMISE TO YOU

Guernsey Community Savings is committed to protecting your personal information and being transparent about what we do with it. We will use your personal information in accordance with applicable law and not to do anything with your information you wouldn't reasonably expect.

We use secure document storage and data no longer required will be disposed of in a secure manner. Our staff are trained in data collection and we ensure our systems are fully secured to protect against unauthorised access, improper use or disclosure.

We will not use your personal information for marketing purposes if you have indicated that you do not wish to be contacted by us for such purposes.

We do not use automatic decision-making technology.

## CONTROLLER

Guernsey Community Savings is not yet required under current Guernsey legislation to be registered as a data controller with the Data Protection authority in Guernsey. However, we fully operate under normally expected data protection guidelines as if we were registered and will indeed formally register when required.

## WHY WE COLLECT AND HOLD YOUR DATA

There are different legal bases that we rely on to use your personal information, namely:

**Performance of a Contract** – The use of your personal information may be necessary to perform the agreement you have with us. For example, to establish and maintain an account or to provide services (suppliers).

**Consent** – If you opt-in (or subscribe) to our mailing list or promotions, then you have given consent for us to send you emails with relevant promotional and/or news about Guernsey

Community Savings LBG. You can remove this consent by contacting us to opt-out (or unsubscribe).

We will process your personal data when you:

- become an account holder accessing account services
- sign up for newsletters or events
- contact us by email
- make a donation
- complete a survey
- complete our contact page (website service)

Your personal information will help us to deliver our services, provide information on our services and to enable our fundraising activities and administration of our charity and to comply with our obligations to keep records.

We also need to process data to comply with legal obligations imposed on us in connection with tax and charities and anti-money laundering regulation.

Unless opted-out, we may carry out targeted fundraising activities to ensure that we are contacting you with the most appropriate communication, which is relevant and timely and will ultimately provide an improved experience for you. Such information is compiled using publicly available data about you or information that you have already provided to us.

## WHAT PERSONAL INFORMATION WE MAY COLLECT FROM YOU

We may collect some or all of the following information.

If you open an account with us (or act as an authorised person on an account with us), at the outset of our relationship and on a continuing basis as required:

- Your name and former names (verified by suitable ID document);
- Your contact details, including postal address, email, telephone numbers (verified by suitable ID document);
- Your mother's maiden name or similar;
- Your date and place of birth;
- Bank account details;
- Employer details;
- Marital status;
- Account details of persons or others to whom you have asked us to remit funds;
- Publicly available information.

If you are a supporter or donor, at the beginning and on a continuing basis as required:

- Your name;
- Your contact details, including postal address, email, telephone numbers;
- Your date of birth;
- Donation amount;
- Source of donation (which may include bank details);
- Publicly available information.

## WHAT WE USE YOUR PERSONAL INFORMATION FOR

If you open an account with us (or act as an authorised person on an account with us) the information we gather enables us:

- To establish and operate your account efficiently.
- To enhance the services we provide.
- To keep a record of your relationship with us and for internal administrative purposes and to let you know about changes to our service.
- To investigate complaints or other issues.
- We use personal information to carry out statistical analysis and research in order to help us understand how we are performing and how we can improve
- We may also use your personal information for other purposes which we will specifically notify you about and where appropriate, obtain consent.

If you are a supporter or donor:

- To enable us to provide updates including newsletters, details on future fund raising events and initiatives; to liaise on how you might want to develop your interest in our work.
- To keep a record of your relationship with us.
- To investigate complaints or other issues
- We use personal information to carry out statistical analysis and research in order to help us understand how we are performing and how we can improve
- We may also use your personal information for other purposes which we will specifically notify you about and where appropriate, obtain consent.

## SOURCES AND RECIPIENTS OF DATA

The sources of data may include account holders, supporters, donors and independent agencies (e.g. other charitable organisations or care providers) and government departments.

Potential recipients of data may include, any sub-contractors, agents or service providers of Guernsey Community Savings (including IT system vendors); courts or tribunals; third parties with whom Guernsey Community Savings engages for the hosting of events or other marketing initiatives; law enforcement and regulatory agencies (where considered necessary for Guernsey Community Savings to fulfil its legal and regulatory obligations).

In the event that any such third party is outside of the European Union (EU) we will ensure that relevant protections extend as equivalent to those expected within the EU.

## HOW LONG DO WE HOLD YOUR PERSONAL INFORMATION

Guernsey Community Savings will retain your personal data for as long as necessary to fulfil the purposes for which it is collected. Where data is processed on the basis of consent, you can unsubscribe at any time and subscribe with a new email address if you want to change details.

## DATA SUBJECT RIGHTS

You have various rights within the law. Your rights in summary are:

The right of **access** to data; to **rectification**; to **erasure or right to be forgotten**; to **restriction of processing**; to the **right to be informed**; to **data portability**; to **object** and **not to be subject to a decision based solely on automated processing**; the right to **complain**.

In any case in which a data subject chooses not to provide any personal data or where any of the rights set out above are exercised to limit the processing of personal data, Guernsey Community Savings may be unable to provide relevant services, or there may be a restriction on the services we provide.

## SHARING YOUR STORY

Some members choose to tell us about their experiences of our services. This may involve their story being retold within selected media or on our website.

We make sure we have the explicit and informed consent of the individuals before any information is made public by us at events, in media and materials promoting our campaigning and fundraising work, or in documents such as an annual report.

## CONCERNS OR QUERIES

If you have any questions relating to this notice please contact us at:

Guernsey Community Savings, Unit 2, Cour du Bordier, Le Bordage, St Peter Port, Guernsey, GY1 1BP. Email: [information@gcs.gg](mailto:information@gcs.gg) or telephone 01481 700360.

Should you wish, you can contact the Office of the Data Protection Commissioner at:

Office of the Data Protection Authority, St Martin's House, Le Bordage, St Peter Port, Guernsey, GY1 1BR. Telephone: 01481 742074. Email: [enquiries@odpa.gg](mailto:enquiries@odpa.gg).

## CHANGES TO THIS NOTICE

We may change this Privacy Notice from time to time. If we make any significant changes in the way in which we treat your personal information, we will make this clear on our website [website to be added and/or by contacting you direct.

The date of the last update was 3<sup>rd</sup> August 2020