

Fair Processing Notice

for the

Helping Hand Appeal - Vouchers

1. The States of Alderney President's Office has set up a fund to offer support for Alderney residents who are struggling during the Coronavirus pandemic. In order to be eligible and receive a voucher personal information will be required, which will be kept to a minimum, through an application form. This application information will be used to determine eligibility and level of support offered. The General Office Manager will collect and process your personal data for these purposes. Some of the information gathered may be published in a summarised and anonymised form.
2. The General Office Manager at the States of Alderney General Office is the controller of that personal data. The General Office Manager and the Helping Hand's Adjudication Panel will be the processor of the personal data.
3. If you provide any special category data when completing this form¹, for example financial data, it is requested that you keep details to a minimum. To the extent that you provide any special category data, it will be processed as part of the application.
4. No decision will be made based on automated processing² of your personal data.
5. The General Office Manager expects to disclose your personal data, to one or more of these recipients or categories of recipients:
 - (a) The President of the States of Alderney to carry out this funding appeal and otherwise process and store your personal data;
 - (b) Helping Hand Adjudication Panel to carry out the decision making process to be able to award voucher benefits
 - (c) The States of Alderney officers assisting the President involved in carrying out or overseeing application process;

¹ Personal data revealing an individual's racial or ethnic origin, political opinion, religious or philosophical belief, or trade union membership; genetic data, biometric data, health data, personal data concerning an individual's sex life or sexual orientation, or personal data relating to the commission or alleged commission of a criminal offence, or proceedings for a criminal offence.

² Processing of personal data by automated means, where a decision affecting the significant interests of the data subject is solely based on such processing.

- (d) if you have ticked the 'Consent 1' box on the application form, your details will be disclosed to members of the Helping Hand's Adjudication Panel;
 - (e) if you have ticked the 'Consent 2' box on the application form, your contact details may be disclosed to the States of Guernsey.
6. The legal basis for processing your personal data are:
- (a) The processing is necessary for the exercise of public function, the President who is a civic leader of the community and takes precedence except for The Queen, The Lieutenant Governor and the Bailiff.
 - (b) The processing is necessary for the exercise to administer applicant's requests for funds;
 - (c) If you have ticked the 'Consent 1' box on the application form your details will be disclosed to members of the Helping Hand's Adjudication Panel to process your request
 - (d) If you have ticked the 'Consent 2' box on the application form, your consent for us to disclose your contact details to the States of Guernsey.
7. There is no intention to disclose your personal data to a recipient in any country or territory other than the Bailiwick of Guernsey and possibly the United Kingdom³. As the United Kingdom has left the European Union, the United Kingdom will be a designated jurisdiction (and an authorised jurisdiction for the purposes of personal data transfers).
8. There is no intention to use your personal data beyond the 01st August , 2021 and following that date, the intention is your personal data will be stored for no longer than 12 months. In light of this your personal data will be erased or kept in a form that does not permit identification of data subjects no later than the **01st August, 2021**.
9. You have the data subject rights set out in sections 14 to 24 of the Data Protection (Bailiwick of Guernsey) Law, 2017, summarised in the attached Schedule.
10. If you have ticked the 'Consent 1' or 'Consent 2' box on the application form, you have the right to withdraw your consent in accordance with the instructions in that form.
11. The contact details of the General Office Manager and the President's Office and its data protection officer are as follows:

³ For the purposes of electronic data storage.

President: William Tate.

Email William.Tate@gov.gg

General Office Manager: Liz Sumner.

Email Liz.Sumner@gov.gg

States of Alderney

PO Box 1001

Alderney

GY9 3AA

The Channel Islands

Tel: 01481 822811

Data Protection Officer:

Mr. Ian Haywood

Tel: 01481 820049

Email: dp@alderney.gov.gg

11. You may make a complaint in writing to the Data Protection Authority under section 67 of the Data Protection (Bailiwick of Guernsey) Law, 2017 if you consider that the President's Office or States of Alderney officers have breached, or is likely to breach, an operative provision of that Law, and the breach involves, affects or is likely to involve or affect your data subject rights (see paragraph 9 of this Notice and the Schedule) or any personal data relating to you.

SCHEDULE

a. Right of access

A data subject has the right to be advised as to whether a controller is processing personal data relating to them and, if so, that individual is entitled to one free copy of their personal data (with further copies available at a fee prescribed by the controller). This is known as a Subject Access Request (SAR). Upon receipt of a SAR, the controller has a period of one month to adhere to the request (an extension of two further months can be sought by the controller depending upon the complexity and number of requests submitted by the data subject).

b. Right to data portability

A data subject has the right to data portability, this means that an individual is able to arrange for the transfer of their personal data from one controller to another without

hindrance from the first controller. This right can only be utilized where the processing is based on consent or for the performance of a contract. This right cannot be used for processing by a public authority.

Where a data subject invokes the right to data portability, the data subject has the right to be given their personal data in a structure, commonly used and machine-readable format suitable for transmission from one controller to another. Upon the request of a data subject, the controller must transmit their personal data directly to another controller unless it is technically unfeasible to do so.

c. Exception to right of portability or access involving disclosure of another individual's personal data

A controller is not obliged to comply with a data subject's request under the right of access or right to data portability where the controller cannot comply with the request without disclosing information relating to another individual who is identified or identifiable from that information.

d. Right to object to processing

A data subject has the right to object to a controller's activities relating to the processing of personal data for direct marketing purposes, on grounds of public interest and for historical or scientific purposes.

e. Right to rectification

A data subject has the right to require a controller to complete any incomplete personal data and to rectify or change any inaccurate personal data.

f. Right to erasure

A data subject has the right to submit a written request to a controller regarding the erasure of the data subject's personal data in certain circumstances. These include where:

- The personal data is no longer required in relation to its original purpose for collection by the controller;
- The lawfulness of processing is based on consent and the data subject has withdrawn their consent;
- The data subject objects to the processing and the controller is required to cease the processing activity;
- The personal data has been unlawfully processed;

- The personal data must be erased in order to comply with any duty imposed by law; or
- The personal data was collected in the context of an offer from an information society service directly to a child under 13 years of age.

g. Right to restriction of processing

A data subject has the right to request, in writing, the restriction of processing activities which relate to the data subject's personal data. This right can be exercised where:

- The accuracy or completeness of the personal data is disputed by the data subject who wishes to obtain restriction of processing for a period in order for the controller to verify the accuracy or completeness;
- The processing is unlawful but the data subject wishes to obtain restriction of processing as opposed to erasure;
- The controller no longer requires the personal data, however the data subject requires the personal data in connection with any legal proceedings; or
- The data subject has objected to processing but the controller has not ceased processing operations pending determination as to whether public interest outweighs the significant interests of the data subject.

h. Right to be notified of rectification, erasure and restrictions

Where any rectification, erasure or restriction of personal data has been carried out, the data subject has a right to ensure that the controller notifies any other person to which the personal data has been disclosed about the rectification, erasure or restriction of processing. The controller must also notify the data subject of the identity and contact details of the other person if the data subject requests this information.

i. Right not to be subject to decisions based on automated processing

A data subject has the right not to be subjected to automated decision making without human intervention.