

DATA PROCESSING NOTICE

This is the Data Processing Notice (also known as a Privacy Policy) of Friends of the Priaulx Library (FoPL). It is issued in compliance with the Data Protection (Bailiwick of Guernsey) Law, 2017 “the Law”

We care about your personal data and ensure you are informed about how we use it. We promise to protect your data, and to manage any information you share with us in line with data protection law.

This Notice sets out how and why we collect and use your personal data and our legal basis for doing so.

Who Are We?

We are a registered charity, and our aim is to support the Priaulx Library as detailed in the FoPL’s constitution. We are registered with the Guernsey Charities and the Guernsey Registry (no. 264). We are also registered with The Office of the Data Protection Authority (registration number DPA2864).

What Data We Collect

We only hold the names, postal and email addresses and phone numbers of our members, together the type, status and cost of your membership and bank details pertaining to your method of payment. We do not hold credit or debit card details. This not only enables us to contact our members and enables us to carry out our core business services or comply with a contract but also to comply with statutory requirements and our legal obligations.

Where Does This Information Come From?

The personal data we process is given to us directly by you, our members. We do not collect any personal data from any other sources.

Our Lawful Basis For Processing Your Personal Data

In order to be able to provide you with the services you require, we use our legal contractual basis for processing your data or rely on our legitimate business interests.

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Consent

In instances where we are not relying on a contractual or legitimate business interest's basis, we rely on consent to lawfully process your data. This can be obtained orally or by email. You have the right to withdraw your consent at any time, however, it must be highlighted that by withdrawing your consent we may not be able to provide you with our core business services.

Types of Personal Data We Collect

- Your contact details, such as name, postal address, email address and contact number
- A record of our communications with you
- Your communication preferences
- Type, cost, and status of membership and bank details pertaining to your method of payment. We do not hold credit or debit card details

Special Category Data

Defined in the Law as – “Personal data revealing an individual’s racial or ethnic origin, political opinion, religious or philosophical belief, trade union membership, genetic data, biometric data, health data, data concerning an individual’s sex life or orientation, & criminal data.”

We do not process Special Category Data as defined by the Law’

Sharing of your Personal Data

We do not share your personal data with any third party.

Transfer of Data

We utilise commercial companies (DropBox & MailChimp, for example) to store your personal details and for sending out email communications (newsletters, forthcoming events and information relating to the FoPL and the Prialux Library).

Direct Marketing

We do not use any form of direct marketing.

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Retention of Data

All data is retained securely and only used for the purposes for which it was collected under the Law. Data is only retained for as long as is required to comply with our statutory obligations, in order for us to provide you with the services forming part a contract or with your consent. In any event, data is reviewed and weeded accordingly after 7 years. Please see our Retention Policy for details.

Your Rights

The Law provides you with a number of rights, but specifically and of relevance, you have the right to:

- request confirmation of the personal data that we hold about you and what we are doing with your data
- request correction of your personal data if incorrect, out of date or incomplete
- request that we stop any consent-based processing of your personal data after you have withdrawn that consent

Contacting Us

- We are defined as a Controller according to the Law. If you have any questions or queries regarding how your personal data is being managed, please contact The Secretary by writing to Friends of The Priaulx Library, c/o The Priaulx Library, Candie Rd, St Peter Port, GY1 2UG or by emailing info@friends.org.gg

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Contacting the Regulator

- If you feel that your data has been handled incorrectly or you are unhappy with our response to any requests you have made to us regarding the use of your personal data, you have the right to lodge a complaint with the data protection regulator – The Office of the Data Protection Authority (ODPA). You can contact them for advice by writing to:

The Office of the Data Protection Authority
St Martin's House
Le Bordage
St Peter Port
Guernsey
GY1 1BR

by telephoning (01481) 742074 or by email to enquiries@opda.gg or you can submit a complaint online at www.odpa.gg and complete the 'make a complaint' section.

This document is to be reviewed on an annual basis at the FoPL's AGM.

NOTE

This document, once completed and agreed upon, must be 'readily available to anyone wanting to view it. It can be posted on a noticeboard for instance and should be added to any website you have, included as a link on any emails sent out, and should be supplied to any new customer/client/member at the commencement of any new relationship between you. This Notice must also be used in conjunction with any other policies and documentation, ensuring joint compliance with the Law.