

Privacy Policy

During the course of its activities, the Guernsey Nature Commission LBG ("***the Nature Commission***") will process personal data (which may be held on paper or electronically) about the Nature Commission's representatives, stakeholders and contacts. The Nature Commission recognises the need to treat personal data in an appropriate and lawful manner, in accordance with the Data Protection (Bailiwick of Guernsey) Law 2017 (the "***Data Protection Law***").

This Privacy Policy sets out our approach to ensuring we do this.

For any questions about this policy please contact the Nature Commission at [office@naturecommission.gg] or on 01481 763271. You can also write to us at the Nature Commission, Lisia House, Rue à Chiens, St Sampson's, Guernsey, GY2 4AE.

Definition of Personal Data

"Personal data" refers to any information relating to an identified or identifiable natural person ("Data Subject") who can be identified, directly or indirectly, by reference to an identifier such as name, identification number, online identifier.

Data Protection Principles

The Nature Commission will comply with the data protection principles, as defined by the Data Protection Law, which requires that personal data must be processed with due care and accountability and be:

- Processed lawfully
- Processed fairly and transparently
- Processed only for the agreed purpose (Purpose Limitation)
- Adequate, relevant and not excessive for the purpose (Data Minimisation)
- Accurate
- Not kept longer than necessary to achieve the agreed purposes
- Processed in a manner that maintains integrity and confidentiality.

Data Subject Rights

The Nature Commission interacts with different types of Data Subjects, including volunteers and employees, stakeholders, sponsors, suppliers, government officials, and members of the general public.

The Nature Commission will observe all Data Subject Rights as defined by the Data Protection Law, including:

- The right to access
- The right to rectification
- The right to be forgotten
- The right to restriction of processing
- The right to data portability
- The right not to be subject to decisions based on automated processing
- The right to information about how personal information is collected (this is outlined in this document)
- The right to object to processing for direct marketing purposes
- The right to object to processing on grounds of public interest
- The right to object to processing for historical or scientific purposes

Processing for Limited Purposes

The Nature Commission will only process personal data for the specific purpose or purposes notified to Data Subjects, or for any other purposes specifically permitted by the Office of the Data Protection Authority; and only to the extent necessary.

The Nature Commission will process personal data solely for the purposes of the Nature Commission and for fulfilling its duties as an employer and a registered charity; including, but not restricted to recruitment, employment, communications, events and associated administration.

The Nature Commission may also process personal data in order to comply with legal or regulatory obligations as an employer, as a registered charity; or if the Nature Commission is required to report a concern to a local authority for the purpose of safeguarding a person's, or other people's, welfare.

The Nature Commission will not process personal data for the purposes of unsolicited marketing. Marketing materials will only be sent to a person if that person actively subscribes to the Nature Commission's website, newsletter or social media pages. Subscribers may then unsubscribe at any time by unliking or unfollowing the Nature Commission on social media; or unsubscribing from the Nature Commission's website or emails.

Fair and Lawful Processing

The Nature Commission will only process personal data where the Data Subject has given consent by engaging with the Nature Commission on a voluntary basis; or where the processing is necessary to comply with our legal obligations as a registered charity or Employer. If the Nature Commission can only lawfully process a Data Subject's personal data

through reason of consent the data subject can withdraw their consent for processing at any time by contacting the Nature Commission.

In other cases, processing may be necessary for the protection of the Data Subject's vital interests, for the Nature Commission's legitimate interests, or the legitimate interests of others.

Categories of Personal Data

The types of personal data the Nature Commission may process will differ according to the Nature Commission's relationship with the Data Subject.

Examples of personal data processed for the purposes of achieving the Nature Commission's objectives include, but are not necessarily restricted to:

- Communications data, including: Person's name, phone number, email address, physical address, signature, social media ID or alias, and personal opinion expressed in conversation or written record;
- Payment data, including: Credit or debit card information, bank account name, number and sort code, PayPal ID, VAT or Tax Code (if applicable);
- Image Data, including: Photography and film; and
- Record Data linking a Data Subject to the submission or provision of various scientific records.

Examples of personal data processed for the purposes of Employment include, but are not necessarily restricted to:

- Recruitment Data, including: CV (employment history, training history), cover letter, references (including Communications Data of Referees), date of birth, gender, nationality, emergency contact details (Communications Data of Emergency Contacts), notes made during interviews, correspondence, and a signed contract of employment.
- Employment Data, including: uniform size, driving licence, Police Disclosure Certificate, Right to Work or other record of permissions, holiday records, sickness records and sickness certificates, data pertaining to injury or illness, Occupational Health record, probation or performance review record, personal data disclosed in the event of a grievance being raised, investigation, hearing, or disciplinary actions, and personal opinion expressed in conversation or written record.
- Image data, including: Photography or film
- Payroll Data, including: Bank account name, number and sort code, Social Security number, Income Tax Code, salary and discretionary bonus, benefits (sickness/incapacity etc), expenses and receipts.
- Training Records, including: Bookings and reservations, travel information, training certifications or other records.

Consent for Images

The Nature Commission will only take photos, video or audio recordings at public or private events for use on the Nature Commission 's website, social media and press releases; if participants consent to them doing so (verbally, or in written notice). If participants are under the age of 18, Nature Commission Representatives will ask the permission of a responsible person, e.g. parent, carer, teacher or group leader.

The Nature Commission is not responsible for any photographs or recordings taken by members of the general public at public events, for their own use; or photographs or recordings taken by private groups, for their own use.

The Nature Commission will ensure that any member of the Media providing coverage at its events similarly ask for consent prior to taking photos or recordings, for use on media channels.

Special Category Data

The Nature Commission will not request any Special Category data about ethnic origin, political opinions, religious or similar beliefs, trade union membership, health, disability, sexual orientation, criminal proceedings or convictions.

If any person chooses to disclose this information it will be held in confidence, and the data subject may withdraw consent for its processing at any time unless the Nature Commission is required to process the data in the interests of Safeguarding.

Exceptionally, the Nature Commission may request a Police Disclosure Certificate where an employee or volunteer takes on certain roles and/or any relevant employee disability, medical or sickness information that may affect the performance of their duties, or their paid employment.

Use of Personal Data

Personal Data of paid Employees will be obtained during the recruitment process and used throughout the duration of their Appointment.

The Nature Commission may contact individuals and businesses via publicly available email addresses, phone numbers or addresses.

The Nature Commission may also obtain personal data via social media, if a person or business likes or follows any of the Nature Commission's profiles; or via email, if a person or business contacts the Nature Commission to register their interest.

Accuracy

The Nature Commission will take steps to keep all personal data on file accurate and up to date. Data that is inaccurate or out of date will be erased or destroyed. Data Subjects should notify the Nature Commission if their personal details change, or if they become aware of any inaccuracies in the personal data held about them.

Data Retention

The Nature Commission will not keep personal data for longer than is necessary for the relevant purpose. This means that personal data will be destroyed or erased from the

Nature Commission's digital and hard copy systems when it is no longer required unless there is a legal obligation to retain it for a longer period of time.

Data Security

Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of the personal data.

The Nature Commission will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data.

The Nature Commission has in place technical and organisational control measures to maintain the security of all personal data from the point of collection to the point of destruction. These measures include:

- Nature Commission laptops being password protected
- Laptops kept in a locked office or kept in employees' homes
- Individuals other than staff or IT technicians are not permitted to access laptops
- Multifactor authentication implemented
- Document storage system (Sharepoint) requires access to be granted via the use of an approved email account
- Staff training on data protection
- Availability of a shredder to destroy physical data where necessary
- Where data is analysed, it is anonymised
- Anti-virus and malware software is installed on all Nature Commission laptops
- All data is backed up
- Data is wiped from old IT equipment before being disposed.

Sharing information with Third Parties

The Nature Commission will not disclose any personal data to a third party without the explicit consent from the relevant Data Subject; with the following exceptions:

The Nature Commission may share posts on social media, which may mean personal data is visible to other parties beyond the respective project page. The Nature Commission is not responsible, and cannot control, who may see information, posts, likes and comments when sharing its content to other social media pages.

The Nature Commission may share scientific records including limited details of the Data Subject providing or curating such records to other organisations for the purposes of

furthering scientific research or initiatives related to conservation, environmental protection or sustainability.

All such sharing will be relevant to the Nature Commission's purposes, and posts will only be shared with other environmental charities, scientific organisations and corporate sponsors involved in environmental protection and sustainability initiatives.

Subject Access Requests

If a Data Subject wishes to know what personal data the Nature Commission holds about them, they should contact the Nature Commission via email or in writing. Subject Access Requests will be processed free of charge; but repetitive requests may be subject to a fee. The Nature Commission will respond to requests within 30 days. All requests should be forwarded to the CEO. The Nature Commission retains the right to verify the identity of the Data Subject prior to disclosing any personal data.

Data Breaches

In the event of a Data Breach where sensitive, confidential or personal information is accessed, disclosed, exposed or stolen without authorisation, the Nature Commission will initiate an investigation and inform the Office of the Data Protection Authority in accordance with the Data Protection Law. Affected Data Subjects will be informed, in the event that the breach presents a risk to their personal data.

Right To Complain

You have a right to complain about the processing of data by the Nature Commission. This can be done by contacting the Nature Commission at the above contact details in the first instance or, if they prefer, the Office of the Data Protection Authority:

the Office of the Data Protection Authority
Block A,
Lefebvre Court,
Lefebvre Street,
St Peter Port,
Guernsey,
GY1 2JP.
info@odpa.gg
01481 742074

Policy review

This policy will be reviewed regularly to ensure its effectiveness and alignment with evolving best practices and legal requirements.

Next review to be completed by July 2027