

STEP Jersey Branch Privacy Notice

INTRODUCTION

Welcome to STEP Jersey Branch's fair processing and privacy notice.

This notice, which we will refer to as the "Notice", is addressed to any person from whom the STEP Jersey Branch ("Branch", "we", "us" or "our") processes personal data in the course of providing its services ("you"). The Branch is the controller of that data because it determines the purposes and means of the personal data and is therefore required to provide you with this Notice. The Branch will not be the controller of all personal data it receives, so where your personal data is being collected by or on behalf of other parties, we recommend that you take note of who the controller of that data will be and read their privacy notice.

The Notice is distinct from any privacy notice published by The Society of Trust and Estate Practitioners registered in England under company number 2632423 ("STEP") (<https://www.step.org/privacy-notice>).

The Branch is a group of STEP members who come together as an unincorporated body for the purpose of the furtherance of the objects of STEP. There are Regulations ("STEP Branch Regulations 2017") which are made pursuant and are subject to the Memorandum and Articles of Association from time to time in force of STEP and regulates the relationship between STEP and Members and the Jersey Branch

Any data that relates to you, or from which you can be identified, is known as "personal data". The Branch respects your privacy and is committed to protecting your personal data. This Notice will inform you as to how we look after your personal data and tell you about your privacy rights and how the law protects you.

Please also use the [Glossary](#) to understand the meaning of some of the terms used in this Notice.

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1. IMPORTANT INFORMATION AND WHO WE ARE

PURPOSE OF THIS PRIVACY NOTICE

This Notice aims to give you information on how the Branch collects and processes your personal data.

It is important that you read this Notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

CONTROLLER

The Branch is the controller of your data (the "data controller"). The Branch is subject to The Data Protection (Jersey) Law 2018 and the Data Protection Authority (Jersey) Law 2018. It may also be subject to the EU General Data Protection Regulation ("GDPR") and the Data Protection (Bailiwick of Guernsey) Law 2017.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this Notice. If you have any questions about this Notice, including any requests to exercise [your legal rights](#), please contact the data privacy manager using the details set out below.

CONTACT DETAILS

Our data privacy manager may be contacted at: step@stepjersey.org

Telephone number: +44 1534 876513

You have the right to make a complaint in relation to data protection issues at any time to the Jersey Data Protection Authority. We would, however, appreciate the chance to deal with your concerns before you approach the authority so please [contact us](#) in the first instance.

CHANGES TO THIS PRIVACY NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

This Notice is effective from 25 May 2018. We will post any material changes that we may make to this Notice in the future on the branch website (<https://www.step.org/branches/step-jersey>) and, where appropriate, we will notify you of the change by email.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

2. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identifying information** (i.e. information used to identify a specific individual, such as name,

principal contact address).

- **Contact information** (e.g. postal address, telephone number, email address).
- **Professional information** (e.g. job titles, employment history).
- **Transaction information** (e.g. details about payments from you and other details of products and services you have purchased from us).
- **Marketing and Communications data** includes your preferences in receiving marketing from us and your communication preferences.

The Branch does not process any **Special Categories of data** about you. Special category data includes personal data which reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, criminal, genetic or biometric data, health or data concerning a person's sex life or sexual orientation.

No personal data is subject to any automated decision making process.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect your personal data and you fail to provide that data when requested, we may not be able to perform the service you have sought and we may have to terminate the provisions of services or decline the requested performance of a task.

3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal information by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes:
 - requests for marketing and event material to be sent to you;
 - applying to attend one of our events;
 - ask questions or give us feedback;
- **STEP.** We directly access personal data from the subscription lists held by STEP. STEP may also be the data controller of your personal data. STEP collects your personal data when you apply or renew your membership.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. We will use your personal data to provide you with information and services as part of your STEP membership, and in particular the conduct of the business of the Branch.

Click [here](#) to find out more about the types of lawful basis for processing of personal data.

Where we rely on consent as a legal basis for processing your personal data in relation to sending direct marketing communications to you via email you have the right to withdraw consent to marketing at any time by [contacting us](#).

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please [contact us](#) if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To deliver services to our members and others. entering your information on the event registers; using your contact details to send you notices of meetings and other communications; using your financial information (e.g. bank account details) to pay for our services.	(a) Identifying (b) Contact (c) Financial (d) Transaction	(i) Performance of a contract
To manage our relationship with you which will include notifying you about changes to our terms or this Notice	(a) Identifying (b) Contact	(i) Performance of a contract with you
To send you marketing information about our services that we think may be of interest to you	(a) Identifying (b) Contact	(i) Necessary for our legitimate interests

OPTING OUT

You can ask us to stop sending you marketing messages at any time by logging into the STEP website and checking or unchecking relevant boxes to adjust your marketing preferences or by [contacting us](#) at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us for other purposes.

CHANGE OF PURPOSE

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please [contact us](#).

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- [Internal Third Parties](#).
- [External Third Parties](#).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We transfer your personal data to STEP. Whilst the UK is an EU member state it will be subject to the GDPR.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees of the Branch and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

HOW LONG WILL YOU USE MY PERSONAL DATA FOR?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature,

and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

We delete personal data within twelve (12) months of the date of processing it.

In some circumstances you can ask us to delete your data: see [Request erasure](#) below for further information.

9. YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please click on the links below to find out more about these rights:

- [Request access to your personal data.](#)
- [Request correction of your personal data.](#)
- [Request erasure of your personal data.](#)
- [Object to processing of your personal data.](#)
- [Request restriction of processing your personal data.](#)
- [Request transfer of your personal data.](#)
- [Right to withdraw consent.](#)

If you wish to exercise any of the rights set out above, please [contact us](#).

NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within four weeks. Occasionally it may take us longer than four weeks if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. GLOSSARY

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by [contacting us](#).

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

THIRD PARTIES

INTERNAL THIRD PARTIES

None.

EXTERNAL THIRD PARTIES

An IT service provider based in Jersey who provides electronic marketing assistance.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be

notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.