

Data Protection Policy

Key Terms

<u>Term</u>	<u>Definition</u>
CAG	The Guernsey Cardiac Action Group LBG
The Board	The Board of Directors of CAG
The Committee	Members including Directors of the General Operations sub-committee
CRDO	The Community Resuscitation Development Officer
GDPR	General Data Protection Regulation and registration with the ODPa
High Risk Processing	Processing of Personal Data is considered as posing a high risk to the significant interests of individuals if it involves: <ul style="list-style-type: none"> - a systematic and extensive evaluation of Personal Data based on automated processing - large-scale processing of Special Category Data, - large-scale and systematic monitoring of a public place - any other prescribed kind or description of processing.
Law	The Data Protection (Bailiwick of Guernsey) Law 2017 as amended.
Notice	Privacy Notice adopted and issued by CAG
ODPA	The Office of the Data Protection Authority
Personal Data	Data which relates to an individual in written, oral or visual form
Policy	Data Protection Policy adopted by CAG
Site Guardians	Persons responsible for maintaining the site of a PAD/AED
Site Owners	Persons who own the site of a PAD/AED
Volunteers	Persons trained by CAG's CRDO in CPR, AED and PAD site awareness
Special Category Data	Personal data which the Law recognises as more sensitive. It is therefore given higher levels of protection, and relates to data revealing an individual's: <ul style="list-style-type: none"> - Racial or ethnic origin - Political opinion - Religious or philosophical belief - Trade union membership - Genetic data - Biometric data

	<ul style="list-style-type: none"> - Health data - Data concerning an individual's sex life or sexual orientation - Criminal data
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Appendices

Appendix 1	Privacy Notice on Website
Appendix 2	Address and contact information for the ODPA

Overview

CAG is committed to complying with the Law in order to respect and protect the privacy rights of individuals. This Policy sets out CAG's approach to the Law and the principles it applies to the processing of Personal Data, to ensure that all personal information is processed in accordance with the Law.

CAG may process Personal Data (including the collection, storage, modification, transfer, viewing, deleting, holding, backing up, archiving, retention, disclosure or destruction) either electronically or in paper format.

CAG has no employees nor does it engage in High Risk Processing.

CAG will not acquire or process Special Category Data.

CAG Data Protection Officer, who will be responsible for monitoring CAG's compliance with the Law is Phil Le Roy B.Sc. FCA.

Data protection principles

CAG adheres to the following principles for maintaining and protecting Personal Data, ensuring all Personal Data must be:

- processed lawfully, fairly and in a transparent manner and only if certain specified conditions are met, in accordance with the Law;
- collected for specific and legitimate purposes, and not processed in any way incompatible with those purposes;
- adequate and relevant, and limited to what is necessary to the purposes for which it is processed;
- accurate and where necessary kept up to date;
- kept for no longer than is necessary;
- processed in a manner that ensures appropriate security of Personal Data.

Lawful basis for processing data

CAG will process Personal Data when;

- the data subject has given their consent to the processing, by a statement or by a clear affirmative action;
- processing is necessary for the work of CAG (for example, training Volunteers or maintaining contact with Site Guardians);
- processing is necessary for compliance with a legal obligation
- processing is necessary for reasons such as providing materials and updates to Volunteers.
- Processing also includes photos/videos taken at volunteer training sessions and/or any promotional event. The photos/videos may be uploaded to the CAG's media/social media and used in any promotional activities

Types of Data CAG collects

CAG collects data from Volunteers at training sessions and others during the routine course of CAG activities, for example contact details. This information is necessary in order to communicate with the relevant parties, to provide them with information and materials, and to ensure ongoing commitments are met.

How we collect personal data

Personal data is collected from individuals when they become a Volunteer or Site Owner or Guardian and this will include name, position, residential address and business address details.

Personal data is also collected on board members, general operational sub-committee members, and the CRDO, again to facilitate communications and the ordinary charitable activities and oversight/governance of CAG

Special Category Data and High Risk Processing

CAG does not seek to acquire or process Special Category Data.

CAG does not engage in High Risk Processing.

Obligations of the Board / Committee / Officers

The Board and Committee of CAG must be familiar with the Law and this Policy. They shall treat all Personal Data with respect and as they would expect their own Personal Data to be treated, ensuring it remains secure and is only available to or accessed by authorised parties. The Committee shall be notified immediately if any Officer or Member becomes aware of or suspects the loss of any Personal Data.

Notification and response procedure

CAG has issued a Privacy Notice which describes how it collects and uses Personal Data. The Privacy Notice is available on CAG's website. Appendix 1.

If CAG receives a request from an individual seeking to exercise data subject rights, the Committee must be notified without delay. The Committee, or a representative of the Committee, will respond in writing, explaining the legal situation and whether CAG will comply with the request, as is appropriate to the nature of the request.

Breaches

A breach of the Law means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data transmitted, stored or otherwise processed. The Committee must keep a log of any breaches. Breach reports can be made via the secure breach reporting facility on the website of the ODPa.

There will be a breach if any Personal Data is accidentally lost, corrupted or disclosed, or if someone accesses it or passes it on without proper authorisation to do so. A breach may be broadly defined as an incident that affected the availability, integrity or confidentiality of the Personal Data. This therefore includes a network intrusion by an unauthorised third party and also a deliberate or accidental act by a service provider that disrupts the availability of Personal Data to those that need to use it. For example, the unintended deletion of Personal Data where no appropriate back-up exists would constitute a breach.

Any Personal Data breach must be reported immediately to the Committee and the Committee or a representative of the Committee must provide the ODPa with written notice of the breach as soon as practicable and in any event no later than 72 hours after becoming aware of the breach. Where full details are not yet known, the initial notification may be followed up with further details as soon as practicable.

The Committee must also notify those individuals affected by the breach if such is likely to result in any risk to their significant interests, such as potential financial loss, reputational damage, adverse impact of safety or wellbeing, or identity fraud. This list is not exhaustive and the Committee's decision should be informed by the nature, scope, context and purpose of the compromised Personal Data.

Data Retention

CAG is committed to ensuring that the information held is secure.

The contact details of Owners and Guardians as well as data relating to Volunteers are stored electronically by any of the Board or Committee members and all therefore have to respect this policy. Hard copies may be retained on the domestic premises of any of the Board or Committee member.

Some data may be shared on CAG's media/social media and used in any promotional activities, with either direct or implied consent from the individuals concerned through clear affirmative action.

Data is retained in accordance with CAG's Document Retention Policy.

Appendix 1

The Privacy Notice on the CAG Website

Privacy Statement

Cardiac Action Group (CAG) take online privacy seriously and are committed to following data protection standards and guidelines including the EU's General Data Protection Regulation (GDPR).

This is the CAG privacy statement for our website: www.cag.org.gg which shall include, without limitation, the home page and all other pages under the same top level domain name, and all content thereon (the "Site") as provided by CAG.

Collecting and using personal information

This Site may request and collect personally identifiable information including name, address, phone number and e-mail address through various means, such as submitted forms on the contact page. All such personal information is processed in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017, as amended.

CAG will only use information collected on and through this Site to comply with the purpose for which such information was collected and for any other purposes that are disclosed at the time the information is provided.

Collecting and using other information

Cookies

A cookie is a small piece of data delivered through your web browser and your computer. These are used to improve the website experience, for example, a cookie will remember confirmation preferences you have set the next time you visit the website to avoid repetition.

Consent to processing

By providing any personal information to this Site, you fully understand and consent to the transfer of such personal information to, and the collection and processing of such personal information in, the Bailiwick of Guernsey and other countries or territories. Such transfer, collection or processing will only be done if it is necessary to comply with the purposes for which the information was collected or for any other purposes that are disclosed at the time the information is provided.

Your acceptance of policy

By using this Site, you signify your acceptance of this Privacy Policy. We reserve the right, at our discretion, to change, modify, add, or remove portions from this policy at any time so visitors are encouraged to review this policy

from time to time. Your continued use of our Site following the posting of changes to these terms, will be regarded as confirmation that you accept these changes.

Access

If you would like to update the personal information that you have provided to the Site or if you wish to review the personal information that we hold for you, please contact CAG directly at:

**CAG c/o The Administrator
8 Lemon Grove
La Route des Jenemies
St. Saviour, GY7 9QS**

T: 07781 129 539
info@cag.org.gg

Appendix 2

Office of the Data Protection Authority (ODPA)

Block A, Lefebvre Court

Lefebvre St

St Peter Port, GY1 2JP

Email: info@odpa.gg