

Privacy Notice

The Channel Islands' Co-operative Society Limited referred to as 'the Co-op', 'Society', 'we' or 'our' is committed to protecting the privacy and security of your personal information.

This Privacy Notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the Data Protection (Jersey) Law 2018 (DPJL) and the Data Protection (Bailiwick of Guernsey) Law 2017 (DPGL).

The Society is a "Data Controller". This means that we are responsible for deciding how we hold and use personal information we have about you whether you are a member of the Society or not.

We are required under data protection legislation to notify you of the information contained in this Privacy Notice.

The Society is registered with the Jersey Office of the Information Commissioner – Registration No. 15593 and the Office of the Data Protection Authority in Guernsey, Registration No. DPA2548.

We will comply with data protection law. This says that the personal information we hold about you must be: -

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

We will also only transfer your information when it is safe to do so, when it is necessary to do so and your information is protected in the same way that we protect it.

The Society is accountable to you and the Authorities to not only show compliance with the data protection laws but also to demonstrate how we are compliant.

We have appointed a DPO to oversee compliance with this Privacy Notice.

If you have any questions about this Privacy Notice or, how we handle your personal information, please contact the DPO at DPO@channelislands.coop.

You have the right to make a complaint at any time to the Jersey Office of the Information Commissioner, the supervisory authority in Jersey for data protection issues or the Office of the Data Protection Authority (ODPA) in Guernsey.

Contact details for these is outlined at the bottom of this Privacy Notice.

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).

To explain this to you, when necessary, we will list our different services when we collect or use different information about you.

We collect personal information about our you when you contact us, become a member of the Society, use one of our Pharmacies, use the services of one of our Funeral Care providers or provide us with your information for another specific purpose.

- Name
- Title
- Address
- Date of Birth
- Place of Birth
- Identification documents
- Share Number
- Telephone number
- Email address
- Signature
- CCTV image when visiting our stores

Funeral Care Providers

- Deceased's particulars
- Banking details
- Information required by your chosen funeral plan provider.

Society Membership

- Any joint account holder
- Signatories (eg; in the case of Charitable organisations)
- Balance on you share / loan account
- Double-dividend receipts paid into account

Members who acquire additional share capital

- Occupation or profession

- Source of funds
- Source of wealth
- Gender
- Place of birth
- Nationality
- Proposed use of funds
- CDD documentation required under money laundering legislation, such as government issued identification number or other government issued unique identifier (e.g. passport number / driving licence card number)

Where this information is required by the Society in order to comply with applicable anti-money laundering and countering terrorism financing legislation and regulations.

Pharmacy Locale

- Required medication
- General Practitioners details
- Social Security number

Retail Services (Stores and Online shopping)

- Order history
- Log-in details (we do not have access to or store your password)
- Shopping basket (until you checkout or delete the items)

Use of CCTV images

The Society uses CCTV in their stores, public areas, and car parks for security reasons. The cameras are positioned to cover, where possible the Society property only, although in some circumstances the camera may record a public footpath or a public road and capture members of the public and vehicles who are not customers of the Society.

The legal basis for us to use the CCTV recordings is Legitimate Interest and Legal Obligation. It is present for the detection and prevention of crime, the protection of our customers, suppliers, and colleagues, and to fulfil any requirement of the Health and Safety at Work (Jersey) Law, 1989.

The Society reserves the right to use the images for evidence in the prosecution of offenders and any disciplinary proceedings brought against any of our colleagues.

On occasions when we collect what is called Special Category data, we will always have either a clear legal basis to process this or your explicit consent. If we rely on your explicit consent, you can withdraw this at any time by contacting our DPO at DPO@channelislands.coop.

Special Category data is any information relating to your health, gender, race, sexual orientation, sex life, genetic or biometric data etc.

An example of this processing would be when you use one of our pharmacies for any prescribed medication. We collect your information and medication type from that prescription. This information is then stored very safely in our computer system. We have a legal obligation to collect this information and to store it.

We will only use your personal information when the law allows us to, this is called a legal basis (highlighted in bold) for processing your information (data).

Most commonly, we will use your personal information in the following circumstances:

- Where we need to comply with a **legal obligation**. This would be collecting your social security number or medication information when you use our Pharmacy, your identification data (passport, driving license etc.) when using our money services.
- Where you have entered into a **contract** with us to provide you with a service. This would be the case when you become a member of the society, book a holiday with us, engage one of our funeral care providers or use one of our money services.
- Where it is necessary for our **legitimate interests** (or those of a third party) and your interests and fundamental rights do not override those interests. An example of this is the use of CCTV in all our stores. This is to protect you as our customer, protect the safety of our employees, prevent and detect crime and for internal investigations for health and safety issues.

We may also use your personal information in the following situations, which are likely to be rare:

Where you have given, you **consent** to contact you for a specific purpose.

- In an emergency and it is in your **vital interest** that we share your information, when we have it recorded.

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

We may on occasions pass your Personal Information to organisation outside of the Co-op exclusively to process on our behalf, these organisations are called Third Parties.

The Co-op requires these parties to agree to process this information based on our instructions and requirements consistent with this Privacy Notice.

We do not pass on information gained from your engagement with us without a clear legal basis for doing so. However, the Co-op may disclose your Personal Information to meet legal obligations, regulations, or valid governmental request such as a Police request for CCTV, or regulatory (Guernsey Financial Services Commission or Jersey Financial Services Commission), Financial Intelligence Unit, revenue or social security in respect of financial crime related activity.

The personal data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA").

It may also be processed by companies operating outside the EEA who work for us or for one of our service providers.

If we do this, we ensure that your privacy rights are respected in line with this Policy and the same protection is given to your personal information as laid down by the DPJL and DPGL.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, altered or disclosed, or accessed in an unauthorised way. In addition, we limit access to your personal information to those Colleagues, Agents, Contractors and other third parties on a need to know basis.

They will only process your personal information on our strict instructions and they are subject to a duty of confidentiality.

Details of these measures may be obtained from our Data Protection Officer (DPO).

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

All data is retained securely and only used for the purposes set out in the Law. Data is retained to comply with our statutory obligations and in accordance with our retention schedule. If you would like a copy of our retention schedule, please contact our DPO at DPO@Channelislands.coop.

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.

You can request our Data Retention Schedule from our DPO if required.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

It is important that the personal information we hold about you is accurate and current.

Please keep us informed if your personal information changes during your relationship with us.

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information 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 information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing or request that we transfer a copy of your personal information to another party, please contact our DPO at DPO@channelislands.coop.

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

For Data subject Access requests, or if you have any questions about how we use your data, please contact our DPO at DPO@channelislands.coop.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

We will respond to your request within **4 weeks** after and upon satisfactory verification of your identity.

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, please contact our DPO at DPO@channelislands.coop.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates.

We may also notify you in other ways from time to time about the processing of your personal information or requesting you to confirm the accuracy of the information we hold on you.

We would like the chance to resolve any complaints you have about the way we process your information; however, you do have the right to complain to the Jersey Office of the Information Commissioner or the Office of the Data Protection Authority in Guernsey about how we have used your personal data.

Upon receipt of a Complaint about one of the products or services we offer it may be required that we share your data and the subject of the complain with a supplier or producer of the product or service you have complained about. This is part of the investigation into your complaint, and we can assure you that your data will be protected as well as it is outlined in the notice.

If you do not want your data shared with a supplier or producer of the product or service you want to complain about, please inform the member of staff taking your Complaint, or email our DPO at DPO@channelislands.coop.

The details for each of these contacts are:

The Channel Islands Co-operative Society,

Attention of the Data Protection Officer

Co-operative House, 57 Don Street, St Helier, Jersey JE2 4TR

Telephone +44 (0) 1534 879822 or email DPO@channelislands.coop

Office of the Information Commissioner – Jersey

2nd Floor, 5 Castle St, St Helier, Jersey JE2 3BT

Telephone +44 (0) 1534 716530 or Email: enquiries@jerseyoic.org

Office of the Data Protection Authority – Guernsey

St Martin's House, Le Bordage, St Peter Port, Guernsey, GY1 1BR

Telephone +44 (0) 1481 742074 or Email: enquiries@odpa.gg

This notice can also be found on our website:

<https://www.channelislands.coop/your-society/your-rights/privacy-notice/>