

Privacy Notice

Purpose of privacy notice

The Gibraltar Parliament is committed to protecting and respecting your right to privacy. This privacy notice aims to provide you with information on what data we collect about you, what we do with that information and why we do it, who we share it with, and how we protect your privacy.

This notice covers all personal data collected by the Gibraltar Parliament and where we tell other organisations to collect information for us. This is the same whether the data are collected by letter, email, face to face, telephone or online.

The Gibraltar Parliament holds and processes personal data in accordance with the European Union's General Data Protection Regulation ("GDPR") and the Data Protection Act 2004.

It is important that you read this privacy notice together with any other privacy 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.

We may change this privacy notice from time to time, so please check this page occasionally to ensure that you are happy with any changes.

Personal Data

Personal data are information that identifies a living person. That can be obvious information like a name or an address, but it may also be something like an IP address.

This includes information you tell us about yourself, information we are provided by other people or organisations, or what we learn when you use services we provide.

Some information are considered more sensitive or special:

- ❖ sexuality and sexual health;
- ❖ religious or philosophical beliefs;
- ❖ ethnicity;
- ❖ physical or mental health;
- ❖ trade union membership;
- ❖ political opinion;
- ❖ genetic/biometric data;
- ❖ criminal history,

The Gibraltar Parliament takes extra care when collecting and using these types of special information.

Who we are

The Gibraltar Parliament is the data controller and is responsible for your personal data (collectively referred to as Gibraltar Parliament, “we”, “us” or “our” in this privacy notice).

If you have any questions about this privacy notice or any of our privacy practices, please contact us on the below details-

The Gibraltar Parliament

parliament@parliament.gi

156 Main Street

+350 20078420

Alternatively, you can contact our Data Protection Officer on-

Email address: dpo@gibraltar.gov.gi

Postal address: Government Law Offices, No.40 Town Range, Gibraltar, GX11 1AA

What personal data do we collect?

Personal data means any information about you from which you can be identified. It does not include data where the identity has been removed (anonymisation).

We may collect, use, store and transfer different kinds of personal data about you as follows:

- ❖ **Identity Data** – this includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- ❖ **Contact Data** – this includes residential address, email address and telephone numbers.
- ❖ **Technical Data** – this includes internet protocol (IP) address, your login data.
- ❖ **Profile Data** – this includes your username, password and feedback.
- ❖ **Marketing and Communications Data** – this includes your preferences in receiving information from us and your communication preferences.

How we collect your personal data

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

- ❖ **Direct interactions.** You may give us your Identity and Contact details by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when completing the electoral registration form.
 - raise a complaint with us;
 - create an account on our website;
 - request marketing to be sent to you; or

- give us feedback or contact us.
- ❖ **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns.
- ❖ **Third parties or publicly available sources.** We will receive personal data about you from other government departments and public sector authorities, or from other third party organisations, as set out below:
 - The registration officer may require the Registrar of Births and Deaths, the Head of the Civil Status and Registration Office, any other department of the Government of Gibraltar or agency and the Commissioner of Police to make available such information as he may require for the purposes of his registration duties.
 - The registration officer may require any employer or any householder or person owning or occupying any land or premises in Gibraltar or the agent or factor of any such person to give any information required for the purposes of his registration duties.

How we use your personal data

We will only use your personal data for the purpose for which we collected it, which include the following:

- ❖ To enable you to register or amend your details in the Register of Electors.
- ❖ Where we need to comply with a legal obligation.
- ❖ To manage your relationship with us.
- ❖ To improve our website, products/services, marketing or customer relationships.
- ❖ To recommend services which may be of interest to you.

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. 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.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	(a) Identity (b) Contact	Inclusion in Register of Electors
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy notice	(a) Identity (b) Contact (c) Profile (d) Communications	(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to keep our records

(b) Asking you to leave a review or take a survey		updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact (c) Technical	(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To use data analytics to improve our website, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to keep our website updated and relevant, to develop our business)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact (c) Technical (d) Usage (e) Profile (f) Communications	Necessary for our legitimate interests (to develop our services)

Security, sharing and disclosure of personal data

The security and confidentiality of your data is very important to us.

We will:

- ❖ Ensure safeguards are in place to make sure personal data is kept secure in compliance with Government's Information Security Policy;
- ❖ Ensure that your data remains under the control of our authorised controllers and processors with adequate safeguards to protect your rights;
- ❖ Ensure only authorised staff are able to view your data;
- ❖ Not make your information available for commercial use;
- ❖ Only ask you for what is needed.

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.

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, agents, contractors 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.

All of our staff are trained in the importance of protecting personal and other sensitive information. All civil servants are required to work in line with the core values set out in the General Orders, including; integrity and honesty.

Transferring your personal data internationally

We do not transfer your personal data.

Retention of personal data

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

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, regulatory, tax, accounting or other requirements.

Your personal data will be retained until you cease to be able to be included in the Register of Electors.

OR

We have to keep basic information about our customers (including Contact, Identity and Transaction Data) until you cease to be included in the Register of Electors.

In some circumstances you can ask us to delete your data: see your legal rights below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Your rights

You have the right to ask us:

- ❖ to confirm whether we hold any of your personal data;
- ❖ to provide you with a copy of any personal data that we hold about you;
- ❖ to correct any inaccuracies in your personal data and to modify it in such a way if you believe the personal data we hold is incomplete;
- ❖ to delete (in as much as is possible in the specific circumstances) any of your personal data, where we are required to do so by law;
- ❖ to stop processing your personal data, where required to do so by law;
- ❖ to let you have a portable copy of the personal data we hold about you, where required to do so by law;
- ❖ to stop processing any of your personal data that is processed by us on the basis of our legitimate interests; and
- ❖ where we process your personal data on the basis that you have given us your consent to do so, you may contact us at any time to withdraw your consent.

If you wish to exercise any of these rights, or object to our processing your personal data, please email us on parliament@parliament.gi or write to us at 156 Main Street, Gibraltar.

If you remain dissatisfied, you can make a complaint about the way we process your personal information to us as the Gibraltar Regulatory Authority on +350 20074636.