

Introduction

At Ports of Jersey we are committed to protecting your privacy and have created this Privacy Notice to explain what information we collect, how we collect it and how that information is then used. This information is referred to as your 'personal data' and is managed in accordance with the Data Protection Jersey (2018) Law.

Definitions

'We', 'our' or 'us' – means Ports of Jersey.

'You or 'your' – means any person using the services of Ports of Jersey.

'Information' or 'data' – means all the different forms of information with which you provide us and which we collect in carrying out our duties and in providing services to you.

Why we collect

Ports of Jersey will use your personal data:

- To help keep the public, all our customers and employees safe and secure.
- To comply with our obligations under Tax and Customs & Immigration legislation.
- To operate any online apps & services used to promote better customer experience.
- To comply with Ports of Jersey's operational policies and procedures and the terms of our Maritime and Aviation operator's licences.

Ports of Jersey are the 'Data Controller' of your information. We have endeavoured to structure our core business activities in a clear and transparent manner, reflecting the different ways we may interact with you. These include but are not limited to the following:

- Online Platforms (Social Media & Websites)
- Newsletters and Mailing Lists
- Terminals & Parking
- Maritime & Marina Operation
- Airport Operations
- Emergency Services
- Tenants, Concessions and Property
- Employee Data
- Surveillance (CCTV & Body Cams) and Court Recordings

How and why we obtain your information

We often need to collect information so that we can provide you with our full range of services and fulfil our statutory, regulatory and public obligations. Much of the information we hold comes directly from you. This includes: employment contracts, supplier contract, business partner contracts, mooring agreements, tenant contracts, or when filling out a query box on our website.

In some cases, we gather data as part of our statutory function(s), for example: CCTV surveillance (including body-worn cameras) at the Harbour and Airport for security & enforcement, safety and regulatory purposes. We also act as third party and joint controllers in certain instances, these are documented in Data Sharing Agreements and/or Processor Controller agreements (as required).

We also hold data in relation to:

- Staff: for employment, safety and security
- Suppliers: for contracts, services, billing
- Drone Operators: for licensing/registration, billing
- Plane Owners: for plane registration, hangars, billing
- Boat Owners: for boat registration, marinas, moorings, billing, parking and safety & security
- Tenants: in relation to property management, leases and billing
- Passengers: in relation to travel, safety, security

What we do with your information

We take the security of your personal information seriously, and do not share this unless it is essential in providing you with a service in performing our statutory duties. There may also be occasions when we need to share your information in the following ways:

- when we have your permission to share the information;
- when required by law to disclose your information.
- While pursuing tasks for which Ports of Jersey has a legitimate interest in order to remain open, safe and secure.

How we protect your information

We adopt up-to-date, appropriate data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information. We have a Data Protection Policy, Information Security Policy and Training Policy to ensuring the highest standards of governance are adhered to.

The security measures we have in place include, but are not limited to:

- Policies - All staff adhere to the Acceptable Use Policy.
- Training - There is a mandatory Data Protection training for all new staff and annual updates for existing staff.
- Physical Security/Access Permissions – Ports of Jersey implements an electronic access control system to physically restrict access to areas where data is stored. Access to data which is held in electronic format is managed by a username and password and access is restricted to only those users who have a valid business need.
- Destruction process - All personal data is securely removed after it has reached the end of its retention period. Paper waste is disposed of in designated confidential waste bins.
- Data is encrypted while at rest, and sensitive documents may also be encrypted while in transit.

Retention Periods

We keep information for only as long as necessary to fulfil the purpose for which it was collected. Retention periods are applied according to the classification of the data type, and the purpose for which it is held. A schedule of our retention periods is shown below.

Subject	Retention period
Employment	As Needed + 5 Years
Parking	As Needed + 1 Year
Passes and Permits	As Needed + 1 Year
Records	As Needed + 1 Year
Reports	As Needed + 10 Years
Financial Statements	Indefinitely
Moorings	As Needed + 1 Year
Registration	As Needed + 1 Year
Surveillance	30 Days
Marketing and Mailing Lists	As Needed
Property	As Needed + 10 Years

Note: Currently under review

Website

The Ports of Jersey maintains a website at <https://www.ports.je>

Cookies are used in our website. A cookie is a small text file that a website saves onto your device when you visit the site. It enables our website to remember your actions and preferences over a period of time, so you don't have to keep re-entering them when you come back to the site or browse from one page to another. It makes your experience with us more seamless. Cookies don't store any confidential information about you personally. The cookies on our website simply allow us to track generic usage of our website - not your individual usage behavior. It is not used to identify you personally. You can prevent or modify the use of cookies by websites you visit via the settings of your web browser software. However, this may mean you will not have access to all the functions of our website if you do so.

Ports of Jersey uses Google Analytics, a web-based analysis service provided by Google that tracks and reports website traffic. This allows us to analyse the use of our website and continue to improve our services to you. The Google Analytics cookies are used to collect information about how visitors use the website. This information is collected anonymously and used to report on such things as the number of visitors to a site, their country, and the pages they visit. If you wish for more information on Google

Analytics visit <https://support.google.com/analytics/answer/6004245>

Ports of Jersey has Facebook, Instagram, LinkedIn and Twitter social media plug-ins on our website. These plug-ins are visible on our website. If you click on these plug-ins, you will be taken directly to either Facebook, Instagram, LinkedIn or Twitter in your browser, and the Ports are not responsible for the information that is collected by any of these third-party social media providers.

Third country transfers and safeguard

Ports of Jersey operate in Jersey and our data substantially resides in Jersey.

However, we do use technology which may transfer data to another jurisdiction, for example use of Microsoft and Cloud-based back-up of data.

Where such transfers do not offer the same level of protection of personal data, we will ensure that your data is appropriately protected (for example by reference to IT security standards)

Updates to this Privacy Notice

Ports of Jersey reserves the right to modify this Privacy Statement at any point, so please review it frequently.

- **Your Rights**

Under the Data Protection Law, data subjects have the following rights with regards to their personal information:

- the right to be informed about the collection and the use of their personal data
- the right to access personal data and supplementary information
- the right to have inaccurate personal data rectified, or completed if it is incomplete
- the right to erasure (to be forgotten) in certain circumstances
- the right to restrict processing in certain circumstances
- the right to data portability, which allows the data subject to obtain and reuse their personal data for their own purposes across different services
- the right to object to processing in certain circumstances
- rights in relation to automated decision making and profiling
- the right to withdraw consent at any time (where relevant)
- the right to complain to the Information Commissioner (<https://oicjersey.org/>)

Please bear in mind that if you object to processing or withdraw your consent, this may affect our ability to deliver services to you.

- **Queries**

If you have any questions relating to:

- our privacy policy;
- how we use your information; or
- if you wish to have your information modified, deleted or to gain access to the information held about you,

Should you have any questions in relation to this policy, data protection, information security and how we process your personal data, please contact us by email at dataprotection@ports.je or in writing to; **Zoltan Pallot, Data Protection Officer, Ports of Jersey, Jersey Airport, St Peter, Jersey, JE1 1BY.**