

PRIVACY POLICY
(Version dated 1st August 2018)

Website;

www.stjohnambulancejersey.com

Privacy Policy

At St John Ambulance, Jersey we take your privacy very seriously and are committed to protecting the security of your personal information.

This Policy explains how we, St John Ambulance, Jersey may collect and use the information you give us, the conditions under which we may disclose it to others and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you're happy with any changes. By using our website, you agree to be bound by this Policy.

St John Ambulance, Jersey has appointed a Data Protection Officer, who can help you with any queries about the information in this privacy policy: by email- ceo@sja.org.je or by post-marked for the attention of the Commandery Executive Officer at St John Ambulance, Jersey, 14-16 Midvale Road, St Helier, Jersey, JE2 3YR.

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1. WHO WE ARE

The Commandery of the Bailiwick of Jersey of the Most Venerable Order of the Hospital of St John of Jerusalem Guarantee Company Limited trading as St John Ambulance, Jersey. We are a registered charity in Jersey with the Association of Jersey Charities (charity number 76). We are also a company limited by guarantee registered with the Jersey Financial Services Commission (company number 110893).

The information in this Privacy Policy relates to personal information which is obtained by St John Ambulance, Jersey and for which St John Ambulance, Jersey is the Data Controller under data protection legislation.

2. WHAT TYPE OF PERSONAL INFORMATION IS COLLECTED FROM YOU

The personal information we collect from you is limited to what is necessary to enable us to carry out the purposes for which it is collected. The type of personal information we collect depends on the context of your interactions with St John Ambulance, Jersey and the choices you make, including your privacy settings.

The data we may collect, store and use can include the following:

- Name and contact information. We may collect your first and last name, title, job title and company name, email address, postal address, phone number and other similar contact data.
- Passwords, password hints and similar security information for authentication and account access.
- Payment information. We collect data necessary to process your payment if you purchase one of our goods or services or make a donation, such as your payment instrument number (such as a credit card number or bank account number).
- Whether you are a Jersey tax payer for claiming gift aid.
- Any personal information which you choose to provide us with in correspondence with you.
- Photographs, videography and CCTV footage.
- Your I.P. address (or Internet Protocol Address). This is a unique address that computing devices such as personal computers, tablets, and smartphones use to identify itself. An I.P. address is analogous to a street address or telephone number and could therefore be used to identify you.
- We may collect other online identifiers including cookies information (for more information please see section 14 ('Cookies Policy')), the internet browser and devices you are using and the pages you visited on our website and how long you visited us for

You have choices about some of the personal information we collect. When you are asked to provide personal information, you may decline. Please note that if you choose not to provide

personal information that is necessary to enable us to carry out your request- for instance, to make a donation, for information or to purchase one of our products or services- we may not be able to fulfil that request.

We may provide links via St John Ambulance, Jersey websites to other websites or you might independently visit the website of a third party who provides services on our behalf, such as our course booking system AccessPlanit. The privacy practices of these third-party websites are outside our control and in these cases, you should check the privacy notices of any third-party websites before disclosing any personal information.

In some cases, you might make a donation to us via a third-party payment processor, in which case you should check the privacy policy of that third party as the data controller of your personal information.

3. HOW WE COLLECT YOUR PERSONAL INFORMATION

There are various ways you might share your personal information with St John Ambulance, Jersey depending on how you interact with us. At present we offer the following channels of communication (though not all may be available to you and will depend on the reason for your contact with us):

- Websites- online forms
- Paper forms
- Telephone
- E-mail
- Text
- Social media (Facebook)
- Face to face

For instance, you might provide personal information when making a donation to us through our websites, by text, by telephone or by completing a direct debit form which you send to us by post.

You might send us an e-mail requesting support with a product or service, and personal information might be collected by us to enable us to deal with your enquiry.

When you contact us by telephone, such as for customer support or to place an order, telephone conversations with our representatives may be monitored and recorded.

Some of our premises and vehicles are monitored by CCTV and footage may be captured for security and safety purposes.

When you visit our websites, we use marketing analytics products and providers to measure the effectiveness of our websites, which may entail the collection of personal information in the form of online identifiers.

We may also obtain personal information from third parties. We protect data obtained from third parties according to the practices described in this Privacy Policy, plus any additional restrictions imposed by the source of the data. These third-party sources vary over time, but have included:

- Someone who may have nominated you for an award.
- Someone who may post a photograph or information relating to you to our social media platforms.
- Data brokers from which we purchase information for potential business customers (for example, name, job title and business address).
- Partners with which we offer co-branded services or engage in joint marketing activities.
- Publicly available information such as newspaper or online media items; public posts on LinkedIn or social media; open government databases; databases of grant-funding opportunities and other data in the public domain. Please refer to section 7 ('Profiling') below for more information about how we may use this information.

4. HOW WE USE YOUR PERSONAL INFORMATION

There are various ways in which we may use or process your personal information. We list these below and the legal basis we rely on in each case.

Consent

Where you have provided your consent, we may use and process your personal information to:

- Contact you from time to time about our campaigns, activities, ways you can support St John Ambulance, Jersey (such as volunteering opportunities and fundraising appeals), events, products, services, youth programmes or information and know-how which we reasonably think may be of interest to you. Please be assured that we will not spam you and such communications will be aligned to the consent you have given us.
- Promote St John Ambulance, Jersey campaigns, activities, ways to support St John Ambulance, Jersey (such as volunteering opportunities and fundraising appeals), events, products, services, youth programmes or information and know-how, using a review you have written, a case study about you, photograph or video footage featuring you (or a child aged under 13). These may be featured in social media, printed and digital media, television and radio communications.
- Set up and administer a membership for our Cadets or Badgers programmes in relation to a person aged under 18.
- Provide you with medical diagnosis and treatment when seeking treatment at an event.

You can withdraw your consent at any time by contacting us using the details provided within section 5 below ('Your Right To Withdraw Consent To Processing Of Personal Information') or, in relation to any marketing messages you receive, by using the unsubscribe option included in those messages.

Contractual performance

- We may use and process your personal information to perform a contract with you (or a contract made with someone else which requires us to provide goods or services to you, such as a training course) and to fulfil and complete your orders for goods, services, venue hire, and other transactions entered into with us.

Legitimate interests

We may use and process your personal information where it is necessary for us to carry out activities which are in our legitimate interests as a charity. The main legitimate interests we rely on are:

- (i) to fulfil the charitable purposes of St John Ambulance, Jersey by fundraising through donations, events, sales of supplies and training courses and by sustaining and raising the profile of our organisation through careful marketing and other activities.
- (ii) To operate lawfully and effectively and to administer all aspects of our business as a charity.

Processing donations and legacies

We will process your personal information to fulfill your request to make either a one-off or regular donation to us and to carry out reasonable administration of your donation, which could include thanking you and confirming your direct debit details with you. Where you have made a gift-aid declaration this will include processing your information to enable us to claim gift-aid. We will also process personal information where reasonably required to administer a legacy that has been left to St John Ambulance, Jersey.

Processing membership subscriptions

We will process your personal information to fulfill your request to pay for a membership of our Cadets or Badgers programmes relating to a child under 18 and to carry out reasonable administration of their membership, including communicating with you about activities, camps and training.

Supporting customers and supporters with requests for information

We will process your information to fulfill your request for information about becoming a supporter (for example, a volunteer or donor), campaigns, activities, events, products, services, youth programmes or information and know-how.

Supporting customers with orders of first aid supplies, booking training courses and other enquiries

We will process your personal information to respond to any correspondence you send us and fulfill the requests you make to us, both before and after purchase. We will also process your personal information to carry out reasonable administration of your order or booking.

Processing necessary for us to understand and respond to customers' and supporters' needs

We may process personal information to analyse, evaluate and improve your customer/supporter experience of our office and web-sites and to improve our products and services (we will generally use data amalgamated from many people so that it doesn't identify you personally).

You may choose to give us feedback on any of your experiences with St John Ambulance, Jersey and your feedback together with any personal information you provide will enable us to analyse, evaluate and improve your customer/supporter experience and to respond to you as appropriate.

We may undertake market analysis and research (including contacting you with customer/supporter surveys) so that we can better understand you as a customer/supporter and provide tailored information, products and services that we think you will be interested in. We will only send marketing communications to you if you have provided your consent for us to do so or in certain cases, if we have a legitimate interest in doing so.

Profiling our existing and potential customers and supporters

We use profiling and screening techniques to ensure communications are relevant and timely, and to provide an improved experience for our supporters. Please see section 7 ('Profiling') for further information. You can let us know if you do not want us to use your personal information in this way.

Processing necessary for us to promote our business, products and services and measure the reach and effectiveness of our campaigns

We may send you marketing information from time to time after you have purchased a product or service from us or made a purchasing enquiry, closed your browser with items in your shopping basket or requested other information of interest in a business context. We will only contact you with information about our own products, services and any other information we believe may be of interest to you (and in ways the law allows), which we hope you will like. You have the right to object to us sending you this information at any time. Please see section 13 for information on how to do this ('Your Rights in Connection with Personal Information').

We may also contact you from time to time with marketing information (unless you object) if you are acting on behalf of a business or where we have obtained your business contact details from a data broker or public business directory. In relation to any such information we send by email, we will include an option allowing you to object to receiving future messages by unsubscribing.

We may contact you with targeted advertising delivered online through social media and other platforms operated by other companies, unless you object. You may receive advertising based on information about you that we have provided to the platform or because, at our request, the platform has identified you as having similar attributes to the individuals whose details it has received from us. To find out more, please refer to the information provided in the help pages of the platforms on which you receive advertising from us.

We may process your personal information to identify and record when you have received, opened or engaged with our website or electronic communications. Please see Section 14 ('Use of Cookies') for more information.

We may process your personal information to administer competitions, promotions, lotteries or raffles that you enter with us from time to time and to distribute prizes.

We may use photographs or video footage which feature you, but which do not identify you by name, to promote St John Ambulance, Jersey.

Processing necessary for us to operate the administrative and technical aspects of our business efficiently and effectively

We may have to share your personal information with third parties, as described in section 6 ('Data Sharing') below.

We may have to verify the accuracy of information that we hold about you and create a better understanding of you as a customer/supporter.

We may process your personal information for network and information security purposes, for example, for us to take steps to protect your information against loss, damage, theft or unauthorised access.

We may process your personal information to comply with a request from you in connection with the exercise of your rights. For example, where you have asked us not to contact you for marketing purposes, we will keep a record of this on our suppression lists in order to be able to comply with your request.

We may process your personal information to inform you of updates to our terms and conditions and policies.

Processing necessary to protect our premises, property and people

We may process personal information for crime prevention and detection purposes and to keep our people safe. For example, some of our premises have CCTV cameras and CCTV is also installed on certain vehicles including some ambulances.

Legal obligation

We may process your personal information to comply with our legal requirements (for example, to contact you if there is an urgent safety or product recall notice and we need to tell you about it).

Other grounds for processing

Vital interest

Sometimes we will need to process your personal information if, for example, there is an urgent safety or product recall notice and we or the manufacturer of the product needs to tell you about it, or for life saving medical diagnosis and treatment purposes.

Change of purpose

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.

Please note that we may process your personal information without your knowledge or consent, in accordance with this Policy, where this is required or permitted by law.

5. YOUR RIGHT TO WITHDRAW CONSENT TO PROCESSING OF PERSONAL INFORMATION

If you have consented to the collection, processing and transfer of your personal information for a specific purpose(s), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Data Protection Officer by email- ceo@sja.org.je or by post- marked for the attention of the Commandery Executive Officer at St John Ambulance, Jersey, 14-16 Midvale Road, St Helier, Jersey, JE2 3YR.

As quickly as possible and in any event within 30 days of receiving 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). Please note that if you ask us to stop sending marketing information we will update our records to stop further mailings as quickly as we can, but you may still receive further mailings which were already in progress prior to your asking us to stop for up to 2 months.

The withdrawal of your consent will not affect the lawfulness of our processing based on your consent before you withdrew your consent.

6. DATA SHARING

We will not sell or rent your information to third parties.

We may have to share your data with third parties, as described below. If we do, you can expect a similar degree of protection in respect of your personal information to that provided by us. We require third parties to respect the security of your 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. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

We may pass your personal information to our third-party service providers, including contractors and designated agents, and other associated organisations for the purposes of completing tasks on our behalf (for example to process donations and payments, to fundraise, send you St John Ambulance Supplies communications, to supply you with goods and services, to resolve product queries or issues and to assist us with marketing analysis). However, when we use third party service providers, we disclose only the personal information that is reasonably necessary to deliver the service.

We may transfer your personal information to a third party as part of a sale of some or all of our business and assets to any third party or as part of any business restructuring or re-organisation, or if we're under a legal duty to disclose or share your personal data in order to

comply with or enforce any legal obligation or rights or to enforce or apply our terms of use or to protect the rights, property or safety of our supporters and customers. However, we will aim to protect your privacy.

We may share your personal information with our parent charity, The Priory Of England And The Islands Of The Most Venerable Order Of The Hospital Of St. John Of Jerusalem (charity number 1077265) where reasonably necessary.

Data transfers to parties outside the EU

There may be some instances where your personal information is processed or stored outside of the EU. In those instances, we will ensure that appropriate safeguards are in place for that transfer and storage as required by applicable law.

St John Ambulance operates in the Bailiwick of Guernsey and in the Isle of Man, each of which are outside of the EU. Personal information provided to St John Ambulance, Jersey may be given to our local offices in those territories and stored in data retrieval systems in the territory, but only when you request information or services relating to our operation in those territories. There is an adequacy decision by the European Commission for these countries, which means that they are deemed to provide an adequate level of protection for your personal information.

7. PROFILING

Profiling is often used in direct marketing and involves analysing data to improve the targeting of communications. We may use profiling and screening techniques to ensure communications are relevant and timely, and to provide an improved experience for our supporters. If you do not wish your data to be used in this way, you are entitled to object. Please see section 13 below ('Your Rights in Connection with Personal Information') on how to do this.

We may carry out profiling of potential donors to ensure that we are engaging with the people most likely to support St John Ambulance, Jersey. Profiling allows us to target our resources effectively and help ensure that we only send you information we reasonably think will be of interest to you.

When building a profile, we may analyse geographic, demographic and other information relating to you in order to better understand your interests and preferences, so we can contact you with the most relevant communications. In doing this, we may use additional information from third party sources when it is available, such as publicly available data about you (for example, newspaper articles or online sources).

We do this because it allows us to understand the background of the people who support us and helps us make appropriate requests to supporters who may be able and willing to give more than they already do and to predict the level at which donors may be able to support St John Ambulance, Jersey in the future. Importantly, it enables us to raise more funds, sooner, and more cost-effectively, than we otherwise would.

8. HOW LONG WE KEEP YOUR PERSONAL INFORMATION FOR

We will only retain your personal information for as long as necessary for the purposes we collected it for, as set out in our **Data Retention Schedule**, including for the purposes of satisfying any legal, accounting or reporting requirements. To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your data, the potential risk of harm from unauthorised use or disclosure of your data, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal requirements.

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.

For further information about the retention period in a particular case, please contact our Data Protection Officer by email- ceo@sja.org.je or by post- marked for the attention of the Commandery Executive Officer at St John Ambulance, Jersey, 14-16 Midvale Road, St Helier, Jersey, JE2 3YR.

9. HOW WE KEEP YOUR DATA SAFE

St John Ambulance, Jersey would like to reassure you that we use appropriate security measures to protect your personal information against unauthorised or unlawful processing and against accidental loss, destruction or damage. These measures may include, but are not limited to, a range of organisational safeguards such as staff training, and duties of confidentiality and the following technical safeguards listed below. 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.

- Encryption

Encryption is the process of converting data to an unrecognizable or "encrypted" form. This means that only the sender and intended recipient can view it in a meaningful way. If the encrypted data is stolen, it should not be possible to change it back to readable data.

- Pseudonymisation

Pseudonymisation changes data that can be used to identify a person into data that can't be used to identify a person. This is done by replacing the data that can be used to identify someone with other data, for example, changing someone's date of birth to 01/01/1700.

- Certification from third parties

We engage security experts to test or confirm that our systems meet relevant security standards.

- Secure log on/authentication

As well as requiring staff to enter usernames and passwords, our systems also check that a particular computer or program is authorised to access and manipulate data before allowing it to do so.

- Access controls and role based access controls

Staff are prevented from accessing our systems unless they enter their user name and password. In addition, we restrict whose personal data each user can access depending on their role at St John Ambulance, Jersey and individual data files are password protected. We also limit access to your personal information to those agents, contractors and other third parties who have a business need to know. Everyone with access to your personal information are subject to a duty of confidentiality and will only process your personal information on our instructions.

- Data back-up and restoration

We regularly back-up our systems and data which means that we can restore or recover the system and data from a back-up file.

- Network controls

We protect our network by using Firewalls that only allow access between different networks based upon strict security criteria. For example, a Web Application Firewall filters, monitors and blocks any internet traffic to and from a web application such as webmail and online forms. It detects and blocks anything malicious.

- System testing and monitoring

We regularly test whether our systems are secure. We also engage independent companies to test whether our systems are secure. We regularly monitor our systems for signs of hacking and attacks and we use anti-virus software to detect and prevent computer viruses.

- Data Loss Protection tools

Data Loss Protection tools place limits on where users can save data. For example, users might be prevented from sending data by email or saving it onto their home computer.

- Mobile Device Management

Mobile phones and laptops are mobile devices. Mobile Device Management allows organisations to limit the locations where personnel can save data to on their mobile device.

10. CHANGES TO YOUR PERSONAL INFORMATION

Please let us know if your contact information changes so that we can ensure that our records are accurate and up to date. You can request that we change your contact details by contacting our Data Protection Officer by email- ceo@sja.org.je or by post- marked for the attention of the Commandery Executive Officer at St John Ambulance, Jersey, 14-16 Midvale Road, St Helier, Jersey, JE2 3YR.

11. YOUR RIGHTS IN CONNECTION WITH PERSONAL INFORMATION

By law you have the right to:

- Request access to your personal information. 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 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 to continue processing 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 process 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 of your personal data, or request that we transfer a copy of your personal information to another party, please send a written request to our Data Protection Officer by email- ceo@sja.org.je or by post- marked for the attention of the Commandery Executive Officer at St John Ambulance, Jersey, 14-16 Midvale Road, St Helier, Jersey, JE2 3YR.

We will ask you for information to confirm your identity and, where applicable, to help us search for your personal information. Except in rare cases, we will respond to you within 30 days after we have received any request (including any identification documents requested).

12. USE OF COOKIES

To make full use of the online shopping and personalised features on St John Ambulance, Jersey websites, your computer, tablet or mobile phone will need to accept cookies, as we can only provide you with certain personalised features of this website by using them.

Our cookies don't store sensitive information such as your name, address or payment details: they simply hold the 'key' that, once you're signed in, is associated with this information.

You can restrict, block or delete cookies from St John Ambulance, Jersey at any time through your browser. Each browser is different, so check the 'Help' menu of your particular browser (or your mobile phone's handset manual) to learn how to change your cookie preferences.

More information about cookies and how to control how they are set can be found at www.allaboutcookies.org

15. ORGANISATION CONTACT

We have appointed a Data Protection Officer to oversee compliance with this Policy. If you have any questions about this Policy or how we handle your personal information, please contact our Data Protection Officer by email- ceo@sja.org.je or by post- marked for the attention of the Commandery Executive Officer at St John Ambulance, Jersey, 14-16 Midvale Road, St Helier, Jersey, JE2 3YR.

16. RIGHT TO MAKE A COMPLAINT

You have the right to make a complaint at any time to the Office of the Information Commissioner, the Jersey supervisory authority for data protection issues.

If you wish to make a complaint or raise a concern in relation to a Data Protection matter, download and complete the form from

<https://oicjersey.org/breach-reporting/>

and either send via email to:

enquiries@oicjersey.org

or send by post to:

The Office of the Information Commissioner
Brunel House
Old Street
St Helier
Jersey JE2 3RG