

## Privacy Notice

The GHHA is a Guernsey Registered Charity, charity number CH230.  
Our address is 39 Mount Row, St Peter Port, Guernsey, GY11NU.  
T: 07781 169952.  
E: [ghha@suremail.gg](mailto:ghha@suremail.gg)  
W : [www.guernseyhardofhearing.org.gg](http://www.guernseyhardofhearing.org.gg)

### Purpose of this document

This privacy notice describes how the GHHA collects and uses personal information about you in accordance with applicable data protection legislation. We recognise the importance of this data and the risks related to possession of such data. We are committed to protecting the privacy and security of your personal information.

The GHHA is a “**data controller**”. This means that we are responsible for deciding how we hold and use personal information about you. To comply with data protection legislation and best practice we are required to notify you of the information contained in this privacy notice. This notice sets out your rights under data protection law as well as our commitment to you regarding how we treat your data. We may update this notice at any time. This privacy notice has been prepared specifically for the GHHA’s general contacts and relates specifically to information we hold and use about individuals in that context.

If you have any questions about this privacy notice or how we handle your personal information, please contact us at the address of above.

You have the right to make a complaint at any time to the regulator for data protection and privacy issues:

Guernsey Data Protection Commission  
Data Protection Office  
Guernsey Information Centre  
North Esplanade  
St. Peter Port  
Guernsey  
GY1 2LQ  
Tel: +44 (0) 1481 742074  
Email: [enquiries@dataci.org](mailto:enquiries@dataci.org)

### 1 Data protection principles

We will comply with applicable data protection law. Personal information we hold about you must be:

- 1.1 used lawfully, fairly and in a transparent way;
- 1.2 collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes;
- 1.3 relevant to the purposes we have told you about and limited only to those purposes;
- 1.4 accurate and kept up to date;
- 1.5 kept only as long as necessary for the purposes we have told you about;
- 1.6 kept securely.

### 2 The kind of information we hold about you

- 2.1 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).
- 2.2 We may collect, store, and use the following personal information about you – your name, title, addresses, telephone numbers, personal email addresses and place of employment.

### 3 How is your personal information collected?

We collect personal information about you when we engage with you. In most cases this will be when you provide us with your contact details, when we meet with you, when you attend our events, and when you contact us by letter, email or through our website. From time to time we may obtain this information from a third party who makes a referral to GHHA.

### 4 How we will use information about you?

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information where it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.

## 5 Situations in which we will use your personal information

Specifically, we will use your information to contact you to advise you of our services, events we are holding, and news and information releases relevant to you. In each case we will only contact you in relation to such matters we think may be of interest to you.

## 6 Change of purpose

6.1 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.

6.2 Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## 7 Do we need your consent?

We do not need your consent if we use your personal information to carry out our legal obligations or exercise specific rights under the law. However you do have the right to tell us to stop using your data. More information about this is set out below.

## 8 Data sharing

8.1 We may have to share your data with third parties, including third party service providers.

8.2 We require third parties to respect the security of your data and to treat it in accordance with the law.

8.3 *Why might we share your personal information with third parties?*

We will share your personal information with third parties where required by law, where it is necessary to provide services to you or a third party or where we have another legitimate interest in doing so.

8.4 *How secure is your information with third party service providers?*

All our third party service providers are required to take appropriate security measures to protect your personal information in line with our policies. 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.

8.5 *Transferring information outside the EU*

We will not transfer the personal information we collect about you outside the EU.

## 9 Data security

9.1 We have put in place measures to protect the security of your information.

9.2 Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

9.3 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a professional or business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

9.4 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.

## 10 Data retention

10.1 We will only retain your personal information for as long as necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal and other requirements. Retention periods for your personal information are decided by considering 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. This will vary depending upon the relationship we have with you.

10.2 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.

## 11 Rights of access, correction, erasure, and restriction

### 11.1 *Your duty to inform us of changes*

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 dealings with us.

### 11.2 *Your rights in connection with personal information*

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

11.2.1 **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.

11.2.2 **Request correction** of any incomplete or inaccurate personal information that we hold about you.

11.2.3 **Request erasure** of your 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).

11.2.4 **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.

11.2.5 **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.

11.2.6 **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 contact Mandy Morris in writing.

### 11.3 *No fee usually required*

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.

### 11.4 *What we may need from you*

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.

## 12 Changes to this privacy notice

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.