



The Government of Sark

DOUZAINE

Fair Processing Notice

The Douzaine is responsible for the following data assets:

1. Cadastre
2. Tax Identification Numbers
3. Employees' Records
4. Rubbish Collection Invoicing
5. Tractor Licences
6. Invalid Carriage Licenses
7. Horse Drawn Vehicle Licences

The controller of this data is the Douzaine, the processor is the Douzaine Secretary.

1. The Data Protection Law

The controller acknowledges its obligations as per the data protection law, which provides a number of requirements in terms of processing activities involving personal data. The controller further acknowledges the general principles of processing as well as the rights of a data subject and more information in relation to these provisions are provided within this fair processing notice.

2. The Principles of Processing

a. Lawfulness, fairness and transparency

Personal data must be processed lawfully, fairly and in a transparent manner.

1. Cadastre – is a record of the Owner(s) and Possessor(s) of each property on Sark, each record shows the name and address of the Owner (s) and/or Possessor(s). Data is gathered from the data subject under **The Direct Taxes (Sark) Law, 2002** and is shared with the office of the Tax Assessor.

2. Tax Identification Number (TIN) - is a record of every person who has been issued a Tax Identification Number, only the name and TIN is recorded. A TIN is assigned by the Douzaine Secretary in accordance with the Resolution of Chief Pleas, 18th January 2017. TINs are shared with the Treasurer and the Tax Assessor. The data on a named individual may be shared with other Tax Authorities, on request.
3. Employees' Records - The personal information processed on behalf of the Douzaine is provided by employees. The personal information held by the Douzaine consists of:

- Name
- Address
- Telephone number, if provided by employee
- Email address- if provided by the employee

The Douzaine collects personal data for the purposes of communicating with its employees. Personal data may be shared, with data subject consent.

4. Rubbish Collection Invoicing - The personal information processed by Public Works, on behalf of the Douzaine is provided by data subject. The personal information held by the Douzaine consists of:

- Name
- Address
- Telephone number, if provided by data subject
- Email address, if provided by the data subject.

The Public Works collects personal data for the purposes of billing for services used.

5. Tractor Licences – is a list of each tractor (including construction or agricultural vehicles) licensed for use on Sark roads. The personal information processed by the Douzaine is provided by data subject. The personal information held by the Douzaine consists of:

- Name
- Address
- Telephone number, if provided by data subject
- Email address, if provided by the data subject.

The name and address of each licence holder is gathered from the data subject. This information is shared with the Constable (who issues the License).

6. Invalid Carriage Licences – Is a list of each person requiring the use of an invalid vehicle for use on Sark roads. The personal information processed by the Douzaine is provided by data subject. The personal information held by the Douzaine consists of:

- Name
- Address
- Telephone number, if provided by data subject
- Email address, if provided by the data subject.

The name and address of each license holder is gathered from the data subject. This information is shared with the Constable (who issues the License).

That a person is on the list may be construed to be 'special category data'.

7. Horse Drawn Vehicle Licences - is a list of each Horse Drawn Vehicle licensed for use on Sark roads. The personal information processed by the Douzaine is provided by data subject. The personal information held by the Douzaine consists of:

- Name
- Address
- Telephone number, if provided by data subject
- Email address, if provided by the data subject.

The name and address of each license holder is gathered from the data subject. This information is shared with the Constable (who issues the License).

b. Purpose limitation

Personal data must not be collected except for a specific, explicit and legitimate purpose and, once collected, must not be further processed in a manner incompatible with the purpose for which it was collected.

The controller acknowledges its responsibility with regards to this data protection principle and therefore the controller maintains that it will not further process that personal data in a way which is incompatible to its original reason for processing as specified in section 2a, unless the controller is required to do so by law. The personal data will not be transferred to a recipient in an authorised or an unauthorised jurisdiction (as per the definition within data protection law).

c. Minimisation

Personal data processed must be adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed.

The controller maintains that it will only process the personal data which is detailed in section 2a, and will not process any further personal data that is not necessary in relation to the original reason for processing personal data as specified in section 2a, unless the controller is required to do so by law.

d. Accuracy

Personal data processed must be accurate, kept up-to-date (where applicable) and reasonable steps must be taken to ensure that personal data that is inaccurate is erased or corrected without delay.

The controller will ensure that all personal data that it holds is accurate and kept up-to-date, and any personal data that is inaccurate will be erased or corrected without delay.

e. Storage limitation

Personal data must not be kept in a form that permits identification of a data subject for any longer than is necessary for the purpose for which it is processed.

1. Cadastre – the data will remain on the Cadastre until such time as the Owner or Possessor changes.
2. Tax Identification Numbers – once assigned Tax Identification Numbers are permanent.
3. Employees' Records – personal data is retained for the duration of the employees' employment, information held is reviewed annually.
4. Rubbish Collection Invoicing - personal data is retained the rubbish collection service continues, information held is reviewed annually.
5. Tractor Licences – data on individual tractors is updated each year as part of the licensing process.
6. Invalid Carriage Licenses - data on individual licence holders updated each year as part of the licensing process.
7. Horse Drawn Vehicle Licences - data on individual licence holders is updated each year as part of the licensing process.

f. Integrity and confidentiality

Personal data must be processed in a manner that ensures its appropriate security, including protecting it against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

1. Cadastre - is held electronically as a spreadsheet on the Douzaine Secretary's machine (Dropbox), a paper copy is held in the Greffe Office for public inspection.
2. Tax Identification Numbers - are held electronically as a spreadsheet on the Douzaine Secretary's machine (Teams).
3. Employees' Records, the Contracts are held in a locked filing cabinet at the Committee Offices.
4. Rubbish Collection Invoicing, personal data is stored electronically in the cloud (Sharepoint).
5. Tractor Licences - are held electronically as a spreadsheet on the Douzaine Secretary's machine (Teams).
6. Invalid Carriage Licenses - are held electronically as a Word document on the Douzaine Secretary's machine (Teams).
7. Horse Drawn Vehicle Licences - are held electronically as a Word document on the Douzaine Secretary's machine (Teams).

g. Accountability

The controller is responsible for, and must be able to demonstrate, compliance with the data protection principles.

3. Contact Details

The contact details of the controller are as follows:

The Douzaine

Tel: (01481) 832118 (Monday-Friday 11.00-15.00)

Email: douzaine.sec@sarkgov.co.uk

The contact details for the Data Protection Officer of Sark are as follows:

Data Protection Officer.

Tel: (01481) 832118 (Monday-Friday 11.00-15.00)

Email: data.protection@sarkgov.co.uk