

## 4.2.12 Privacy Policy

At Citizens Advice Guernsey we collect and use your personal information to help solve your problems. We also use it in anonymised form to improve our services and tackle wider issues in society that affect people's lives.

We only ask for the information we need. We always let you decide what you're comfortable telling us, explain why we need it and treat it as confidential.

When we record and use your personal information, we:

- only access it when we have a good reason
- only share what is necessary and relevant
- do not sell it to anyone

### **Coronavirus: Test and Trace if you get advice in person**

If you get advice in person, we could ask for your:

- name
- email address or telephone number

We will keep this information in our secure case management system.

We might be asked to share your name, contact details and the date of your visit with Test and Trace or local public health organisations. This is to help track cases of coronavirus. They might contact you if they think you're at risk after your visit. For example, because someone getting advice at the same time has tested positive for coronavirus. You can find out more about Guernsey current testing guidelines here: -<https://covid19.gov.gg/support/getting-tested>

We'll never share information about the reason for your visit.

If you can't give contact details, for example if it's not safe for you to do so, we'll still be able to give you advice in person.

Unlike most situations, we will not ask for your consent before we share your contact details. If you don't want us to share this information you can tell your local office, you want to opt out.

We are doing this to help keep you and the public safe, this is a 'legitimate interest' of Citizens Advice.

We will not share your contact details with anyone other than a local public health organisation.

If we share your information, we will let you know, and offer further support.

If you want to know more about changes to our face to face services or how your information will be used, please [contact your local office](#) below:

Citizens Advice Guernsey  
Bridge Avenue  
The Bridge  
St Sampson  
GY2 4QS

Telephone: 01481 242734

At times we might need to use or share your information without your permission. If we do, we'll always make sure there's a legal basis for it. This could include situations where we have to use or share your information including:

- to comply with the law - for example, if a court orders us to share information. This is called 'legal obligation'
- to protect someone's life - for example, sharing information with a paramedic if a client was unwell at our office. This is called 'vital interests'
- to carry out our legitimate aims and goals as a charity - for example, to create statistics for our national research. This is called 'legitimate interests'
- for us to carry out a task where we're meeting the aims of a public body in the public interest - for example, delivering a government or local authority service. This is called 'public task'
- to carry out a contract we have with you - for example, if you're an employee we might need to store your bank details, so we can pay you. This is called 'contract'
- to defend our legal rights - for example, sharing information with our legal advisors if there was a complaint that we gave the wrong advice.

We handle and store your personal information in line with the law - including the General Data Protection Law (Bailiwick of Guernsey) 2017.

## **Who is responsible for keeping your information safe?**

Each local Citizens Advice is an independent charity and a member of the national Citizens Advice charity.

Citizens Advice Guernsey is the data controller responsible for keeping your information safe and complying with data protection law.

## **How Citizens Advice Guernsey collect your data**

### **When you get advice from an adviser - our privacy policy**

We collect and use the details you give us so we can help you. We have a 'legitimate interest' to do this under data protection law. This means it lets us carry out our aims and goals as an organisation.

We'll always explain how we use your information.

### **Consent for feedback**

If you give permission to be contacted for feedback, your personal details will be recorded separately from the case record.

## **What Citizens Advice Guernsey ask for**

### **What information we ask for**

We will only ask for information that is relevant to your problem. Depending on what you want help with, this might include:

- your name and contact details - so we can keep in touch with you about your case.
- personal information - for example about family, work, or financial circumstances, or if you are vulnerable or at risk of harm
- details about services you get that are causing you problems - like gas, electricity or post
- details of items or services you have bought and traders you have dealt with
- information like your gender, ethnicity or sexual orientation

We occasionally ask for details about someone else like a neighbour or your partner so we can deal with an enquiry. We will only do this if we have a legitimate interest in the information, or we need it to protect someone's life.

**You can withdraw your consent at any time. Tell us what personal information you do not want us to store and we will delete it.**

### **How we use your information**

We collect and use your information primarily to help solve your problems. We also use it to improve our services and to tackle wider issues in society that affect people's lives.

We only access your information for other reasons if we really need to - for example:

- for training and quality purposes
- to investigate complaints
- to get feedback from you about our services
- to help us improve our services

All advisers and staff accessing data have had data protection training to make sure your information is handled sensitively and securely.

### **Understanding people's problems**

We use some information to create statistics about who we are helping and what problems are the most common. This information is always anonymised - you cannot be identified. We share these with funders, government departments, reports, social media and press releases.

The statistics also inform our policy research, campaigns, or media work.

## **How Citizens Advice Guernsey share your information to work on your behalf**

### **When we share your information with other organisations**

With your permission, we might share your information with other organisations so we can:

- help solve your problem - for example, if you ask us to contact your creditors, we might need to share your name, address and financial details with them;
- refer you quickly to another organisation for more advice, if relevant.

Organisations we share your data with must store and use your data in line with data protection law.

### **Working on your behalf**

When you give us authority to act on your behalf, we'll need to share information with that third party. For example, a local Advocate.

Your personal information is only ever shared with your explicit permission. You will usually be asked to sign a separate release of information form, although on occasion verbal permission may be adequate for an urgent situation when contact with you has only been by phone.

### **If we are concerned about yours or someone else's safety**

If something you have told us makes us think you or someone you know might be at serious risk of harm, we could tell the police or social services - for example if we think you might hurt yourself or someone else.

## **How Citizens Advice Guernsey store your information**

### **Storing your information - if you contact us by email, by phone or face to face**

Whether you get advice face to face, over the phone, or email, our adviser will log all your information, correspondence, and notes about your problem into our secure case management systems. We have a 'legitimate interest' to do this under data protection law. This means it lets us carry out our aims and goals as an organisation.

Some of your information might also be kept within our secure email and IT systems.

We keep your information for 6 years. If your case has been subject to a serious complaint, insurance claim or other dispute we keep the data for 16 years. Case records are stored on a secure server at our premises with password encrypted back-ups stored off-site. Emails are on the cloud cached locally.

Personal information would only be shared and with your explicit permission if you ask us to: negotiate with your creditors, make a referral for pro bono legal advice or contact a government department or other organisation on your behalf. Anonymised data may be used in our work to improve public policies.

## **Contact Citizens Advice Guernsey about your information**

If you have any questions about how your information is collected or used, you can contact our office:

Citizens Advice Guernsey  
Bridge Avenue  
The Bridge  
St Sampson  
GY2 4QS

Telephone: 01481 242734

Email: [admin@citizensadvice.org.uk](mailto:admin@citizensadvice.org.uk)

You can contact us to:

- find out what personal information we hold about you
- correct your information if it's wrong, out of date or incomplete
- request we delete your information
- ask us to limit what we do with your data - for example, ask us not to share it if you haven't asked us already
- ask us to give you a copy of the data we hold in a format you can use to transfer it to another service
- ask us to stop using your information

### **If you want to make a complaint**

If you are not happy with how we have handled your data, you can request a copy of the complaints leaflet to be posted to you.