

Comsure Group of Companies (CGC)

For the avoidance of doubt – Comsure Compliance Limited, Comsure Technology Limited and Comsure Group Limited are all joint controllers for the purpose of Data Protection.

Data Controller contact

Comsure Compliance Limited

1 Bond Street

St Helier

JE2 4NP

+44 1534 626830

Details

How we use your information

This privacy notice tells you what to expect when Comsure Group of Companies (CGC) collects personal information. It applies to information we collect about:

1. people who use, or have used our services,
2. visitors to our websites and onsite;
3. complainants and other individuals in relation to a data protection or freedom of information complaint or enquiry;
4. people who notify under the [DP\(J\) 2018 LAW](#);
5. Job applicants and our current and former employees.

The Comsure Group of Companies

1. CGC is a Compliance consultancy firm, which holds and process' the personal data for the functionality of business within the regulatory environment.

Legal grounds for processing personal data

1. CGC needs to ensure activities involving the processing of personal information are undertaken under one of the six legal grounds for processing.
2. Article 6(1) of the GDPR sets out the conditions the must be met for the processing of personal data to be lawful. They are:
 - 1) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
 - 2) processing is necessary for compliance with a legal obligation to which the controller is subject;

3. In the event that the above 2 conditions are not met CGC will ensure one of the following conditions are met:
 - 1) the data subject has given consent to the processing of their personal data for one or more specific purposes;
 - 2) processing is necessary in order to protect the vital interests of the data subject;
 - 3) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
 - 4) Processing is necessary for the purposes of the legitimate interests pursued by a controller, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child. This shall not apply to processing carried out by public authorities in the performance of their tasks.

People who use CGC services

1. We have to hold the details of the people who have requested the service in order to provide it. However, we only use these details to provide the service the person has requested and for other closely related purposes.

Service providers reporting a breach and retention

1. Public electronic communications service providers are required by law to report any security breaches involving personal data to CGC.
2. We retain personal information only for as long as necessary to carry out these functions, and in line with our retention schedule. This means that logs and breach reports will be retained for ten years from receipt, and longer where this information leads to regulatory action being taken.
3. CGC and their service provider have measures in place to ensure the security of data collected and transferred to CGC in a safe and secure manner

Visitors to our websites

1. When someone visits <https://www.comsuregroup.com/> we use a third party service, Google Analytics, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site.
2. This information is only processed in a way which does not identify anyone. We do not make, and do not allow Google to make, any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

Use of cookies by CGC

1. You can read more about how we use cookies on our Cookies page here

Security and performance

1. CGC may use third party service to help maintain the security and performance of CGC website. To deliver this service it processes the IP addresses of visitors to CGC website.

People who contact us via social media

1. We use Facebook and Instagram as our primary source of social media, and people may contact us through this.
2. The message, and the information contained within, will not be shared with any other organisations or parties unless requested or required to do so.

People who email us

1. We primarily use Galaxkey as our e-mail encryption software, if the end user does not support Galaxkey, then our e-mails will revert to TLS.
2. If Galaxkey is not used by the end user - Transport Layer Security (TLS) will be used to encrypt and protect email traffic in line with government.
3. If your email service does not support TLS, you should be aware that any emails we send or receive may not be protected in transit.
4. We will also monitor any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

People who make a complaint to us

1. When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.
2. We will only use the personal information we collect to process the complaint and to check on the level of service we provide.
3. We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant doesn't want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.
4. We will keep personal information contained in complaint files in line with our retention policy. This means that information relating to a complaint will be retained for Ten years from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.
5. Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues and to check on the level of service we provide.

6. If we take enforcement action against someone, we may publish the identity of the defendant in our Annual Report or elsewhere. Usually we do not, identify any complainants unless the details have already been made public.

Transfers outside Jersey / EU / Adequate Countries

CGC will make best endeavours to not send personal data outside of Jersey / EU / Countries with adequacy status. Any information that is to be sent to any 3rd countries will be done as per the Policy and Procedure, which is available at request.

Data Subject Rights

As the data subject, you have the following rights

1. Right to access your data
2. Right to rectify your data
3. Right to erase your data unless obliged by another law
4. Right of portability of your data
5. Right to Withdraw consent at any time
6. Right to make a complaint to the supervisory Body
7. Right to knowledge of automated processing of data, and the logic and potential consequences.
8. Right to the origin of personal data if not provided by yourself.

How to make a Data Protection complaint to the supervisory Body.

If you wish to make a complaint to the supervisory body, the Office of Information Commissioner (OIC) – then you can ask in store for a form, or fill out the online form on the OIC website [here](#)

Data Processors

1. CGC uses data processors in line with the grounds for Processing as per on page 1
2. If you wish to view all the processors we use – please contact info@comsuregroup.com

Retention Periods

As per the retention policy, personal data will be held for 12 months, unless there is a contractual or legal obligation to hold information.

As per industry standards, personal Data that we are legally obliged to keep may be retained for a period of up to 10 years after the closing of the relationship.

Part 2

CGC and its employees

Job applicants, current and former CGC employees

1. CGC is the data controller for the information you provide during the process unless otherwise stated. If you have any queries about the process or how we handle your information please contact us at info@comsuregroup.com.

What will we do with the information you provide to us?

1. All of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.
2. We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us and/or our data processors whether the information is in electronic or physical format.
3. We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

What information do we ask for, and why?

1. We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.
2. The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it might affect your application if you don't.

Application stage

1. If we use an employment agency, they will collect your data as a data processor on our behalf.
2. We ask you for your personal details including name and contact details. We will also ask you about your previous experience, education, referees and for answers to questions relevant to the role you have applied for. Our recruitment team will have access to all of this information.
3. You will also be asked to provide equal opportunities information. This is not mandatory information – if you don't provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment team, including hiring managers, in a way which can identify you. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

Shortlisting

1. CGC shortlist applications for interview.

Assessments

1. We might ask you to participate in assessment days; complete tests or occupational personality profile questionnaires; and/or to attend an interview – or a combination of these.
2. Information will be generated by you and by us. For example, you might complete a written test or we might take interview notes. This information is held by CGC.
3. If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of six months. If you say yes, we would proactively contact you should any further suitable vacancies arise.

Conditional offer

1. If we make a conditional offer of employment we will ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the Jersey and seek assurance as to their trustworthiness, integrity and reliability.
2. You will therefore be required to provide:
 - a. Proof of your identity – you will be asked to attend our office with original documents, we will take copies.
 - b. Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.
 - c. You will be asked to complete a criminal records declaration to declare any unspent convictions.
 - d. We may ask you to contact the Jersey Police department in order to complete an application for a Basic Criminal Record check via the Disclosure and Barring Service, or Access NI, which will verify your declaration of unspent convictions.
 - e. We will contact your referees, using the details you provide in your application, directly to obtain references
3. If we make a final offer, we will also ask you for the following:
 - a. Bank details – to process salary payments
 - b. Emergency contact details – so we know who to contact in case you have an emergency at work

Post start date

1. Our Code of Conduct requires all staff to declare if they have any potential conflicts of interest
2. If you complete a declaration, the information will be held on your personnel file.

Self-Employed staff

Staff who are Self-employed are considered to be processors, and therefore will be treated as such.

Due to the nature of the business, Self-Employed staff may at times become joint controllers, but they will not share personal information outside the organisation without the express consent of CGC.

Use of data processors

1. Data processors are third parties who provide elements of services for us. We have contracts in place with our data processors. This means that they cannot do anything with your personal information unless we have instructed them to do it. They will not share your personal information with any organisation apart from us. They will hold it securely and retain it for the period we instruct.

How long is the information retained for?

1. If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 10 years following the end of your employment. This includes your criminal records declaration, fitness to work, records of any security checks and references.
2. If you are unsuccessful at any stage of the process, the information you have provided until that point will be retained for 12 months from the closure of the campaign.
3. Information generated throughout the assessment process, for example interview notes, is retained by us for 12 months following the closure of the campaign.
4. Equal opportunities information is retained for 12 months following the closure of the campaign whether you are successful or not.

How we make decisions about recruitment?

1. Final recruitment decisions are made by The Managing Director. All of the information gathered during the application process is taken into account.
2. You are able to ask about decisions made about your application by speaking to your contact within our recruitment team or by emailing info@comsuregroup.com

Your rights

1. Under the [DP\(J\) 2018 LAW](#), you have rights as an individual, which you can exercise in relation to the information we hold about you.
2. You can read more about these rights on page 4 of this document

Complaints or queries

1. CGC tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

2. This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive detail of all aspects of CGC's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below.
3. If you want to make a complaint about the way we have processed your personal information, you can contact us or you can contact the Information Commissioners office if you wish using this form – or visiting their website [here](#)

Access to personal information

1. CGC tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'Subject Access Request' under the [DP\(J\) 2018 LAW](#).
2. If we do hold information about you we will:
 - a. give you a description of it;
 - b. tell you why we are holding it;
 - c. tell you who it could be disclosed to; and
 - d. let you have a copy of the information in an intelligible form.
3. To make a request to CGC for any personal information we may hold you need to put the request in writing addressing it to our Managing Director, or writing to the address provided below.
4. If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.
5. If we do hold information about you, you can ask us to correct any mistakes by, once again, contacting the Managing Director.

Disclosure of personal information

1. In many circumstances we will not disclose personal data without consent. However when we investigate a complaint, for example, we will need to share personal information with the organisation concerned and with other relevant bodies. Further information is available in our Data Protection Policy about the factors we shall consider when deciding whether information should be disclosed.
2. You can also get further information on:
 - a. agreements we have with other organisations for sharing information;
 - b. circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics;
 - c. our instructions to staff on how to collect, use and delete personal data; and
 - d. how we check that the information we hold is accurate and up to date.
3. This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

Changes to this privacy notice

1. We keep our privacy notice under regular review.
2. This privacy notice was last updated in May 2018

How to contact us

1. If you want to request information about our privacy policy you can email us or write to:

Comsure Compliance Limited,

1 Bond Street,

St Helier,

Jersey,

JE2 3NP

Call. +44 (0)1534 626841

Email. info@comsuregroup.com