



This Privacy Notice explains how the Office of the Chief Secretary (“**we**”, “**us**”, or “**our**”) collects, uses, discloses and protects personal information as a Data Controller, in respect of the General Central Data Repository (“**the GCDR**”) and in accordance with the Gibraltar General Data Protection Regulation (“**Gibraltar GDPR**”), the Data Protection Act 2004 (“**DPA 2004**”) and the Data Sharing (Public Authorities) Act 2021. We are committed to protecting your privacy and handling your personal information responsibly.

In this Privacy Notice when we refer to “**Personal data**” we are referring to any information relating to you as an identified or identifiable natural person (“**data subject**”). When we refer to “**Processing**” we are referring to any operation or set of operations which is performed on personal data or on sets of personal data whether or not by automated means (although we do not use automated means). Processing includes for instance, collecting, recording, organising, structuring and storage of data, amongst other actions.

Whilst we are based and provide services in Gibraltar only, you should note that if you live or work outside Gibraltar, other laws (including the EU GDPR) may be applicable to you.

About the GCDR

The GCDR is a system which has been created to facilitate data sharing between HMGoG Departments . The Office of the Chief Secretary is the Data controller of the GCDR after being designated as the relevant HMGoG Department with responsibility for overseeing the coordination and implementation of the Specified Objectives set out in Schedule 2 of the Data Sharing (Public Authorities) Act 2021.

The principal aim of the GCDR is to reduce the need for those who interact with and receive public services to provide the same information to more than one public sector entity under the provisions of the Data Sharing (Public Authorities) Act 2021. The GCDR is the conduit for data sharing across HMGoG Departments and draws data from the various HMGoG Departments set out and, in the manner, set out in this Privacy Notice. By using the GCDR, HMGoG is minimising data sharing and duplication across HMGoG Departments whilst simultaneously reducing the administrative burden faced by HMGoG Departments and individuals when seeking to obtain public services in Gibraltar.

How do we collect Information

The GCDR will only collect information from the following HMGoG Departments:

- The Department of Immigration & Home Affairs;
- The Department for Housing;
- Land Property Services (“**LPS**”);
- The Gibraltar Health Authority (“**GHA**”);
- Income Tax Office (“**ITO**”);
- The Department of Employment;
- Driver and Vehicle Licensing Department;
- The Department of Education;
- The Department of Social Security; and
- Gibraltar Parliament.

The type of Personal Information We Collect & Why we collect it



You will throughout your interactions with the various HMGGoG Departments disclose various different types of personal information which may pertain to you. Accordingly, the type of information which we will collect is dependent on the relevant HMGGoG Department depositing data into the GCDR, however, generally, any information deposited into the GCDR will be limited to basic identifiers (names, address, date of birth, ID Card numbers etc) which HMGGoG Departments may need to share between themselves.

We collect information about you from limited HMGGoG Departments in order to discharge our functions under the Data Sharing (Public Authorities) Act 2021. The GCDR has been designed to reduce the administrative burden and minimise data sharing and duplication between HMGGoG Departments in accordance with their own objectives.

A detailed list of the types of personal information we collect and the justification for the data from each HMGGoG Departments is set out below:

- **The Department of Immigration & Home Affairs:**

Information collected from the Department of Immigration & Home Affairs is limited to that which will assist other public service entities establish whether you are entitled to the provision of public services in Gibraltar. We will therefore collect the following information:

- Basic Identifiers (e.g. Forename & Surname (including if applicable, your parents name and mother's maiden name), date of birth, gender, address, Nationality, National ID Number);
- Certificate number (for the purposes of verifying whether you are on the Register of Gibraltarians); and
- Observations contained in the register.

- **The Department for Housing**

Information collected from the Department for Housing is limited to information relating to your position on the affordable housing waiting list or to the housing tenancy list (for HMGGoG rental flats). We will therefore collect the following information:

- Basic Identifiers (e.g. Forename & Surname, date of birth, address, ID Card Number, tenant code);
- RKB;
- Property list type and the number of bedrooms (to which you are entitled); and
- Position on the waiting List

- **Land Property Services**

Information collected from Land Property Services is limited to that which will assist in the validation of property ownership and residency data and to correct and identify erroneous information held by other HMGGoG Departments or to establish entitlement for the provision of services. We will therefore collect the following information:

- Basic Identifiers (e.g. Forename & Surname, date of birth, Email, phone number, country, address, relationships, individual ID Number, identity register, issuing country name); and
- Other non-personal data (e.g. UPRN, unit type, PSBN, estate name, building number, street name, number of occupants in your property and whether the Property is HMGGoG rental).



- **The Gibraltar Health Authority (“GHA”)**

Information collected from the GHA is limited to that which will assist in reducing the duplication of tasks, increasing the GHA's efficiency and to avoid the administrative burden which you may face in having to provide duplicated information to the GHA. Accordingly, **we will not** collect any special category data and any information collected will be limited to:

- Basic Identifiers (e.g. Forename & Surname, GHA number, gender, date of birth and address).

- **Income Tax Office**

Information collected from the Income Tax Office is limited to that which will assist other HMGoG Departments in establishing your entitlement to the provision of public services in Gibraltar. We will therefore collect the following information:

- Basic Identifiers (e.g. Name & Surname, date of birth, Email, telephone number, ID tax reference number, gender, nationality, address, country, ID Card, Marital status, spouse reference);
- Financial information (e.g. your social insurance contributions, income year, income source, income tax paid, current & historic tax code); and
- Employment information (e.g. employment type, employer tax reference, start date, end date, employer name, address, status and record type).

- **The Department of Employment**

Information collected from the Department of Employment will be limited to that which will assist in validating, identifying and correcting erroneous information and to reduce the administrative burden you may face when sharing data relating to your employment status with other HMGoG Departments. We will therefore collect the following information:

- Employment information (e.g. employment type, employment reference number, job code, job title, start date, end date, employer name and address and whether you are employed or self-employed).

- **Driver and Vehicle Licensing Department (“DVLA”)**

Information collected from the DVLA will be limited to that which will assist in reducing the administrative burden which you may face in dealing with HMGoG Departments and which will equally reduce the duplication of tasks whilst increasing the efficiency of HMGoG Departments. We will therefore collect the following information:

- Basic Identifiers (e.g. Forename & Surname, date of birth, address, owner ID, registration number, licence number, card serial number); and
- Non-Personal data (e.g. vehicle class, date of first registration, vehicle make, vehicle model, vehicle propulsion, disposal & inactivity of vehicle, rwc expiry date, date inserted & any previous registration numbers, licence number, licence issue date, document expiry date and licence categorisation).



- **Department of Education**

Information collected from the Department of Education will be limited to that which will assist HMGoG Departments establish the entitlement to the provision of public services (for example scholarship awards) and to remove administrative burdens on data subject. We will therefore collect the following information:

- Basic Identifiers (e.g. Forename & Surname, date of birth, gender, school & school names, year and school address); and
- Higher education information (e.g. course title, institution, award status, qualification attained, degree type, studies start & end date).

- **The Department of Social Security**

Information collected from the Department of Social Security will be limited to that which will assist HMGoG Departments in establishing your entitlement to the provision of services and to remove administrative burdens which will be placed on you with dealing with HMGoG Departments. We will therefore collect the following information:

- Basic Identifiers (e.g. Forename & Surname, date of birth, address, ID Card number, Passport number, country, telephone number, health card details & employment number)

How do we use your information and what is our legal basis for processing?

We limit processing of data to that which is strictly necessary to satisfy the lawful basis relied upon. Any information we collect and store about you is collected to improve the delivery and efficiency of public services and administration and to minimise the duplication of data across relevant HMGoG Departments. The lawful basis which we rely upon to do this is on discharging of public functions under Article 6(1)(e) of the GGDPR.

Who do we share your personal information to?

We will generally share your personal information with the following parties:

- The relevant HMGoG Departments listed in this Privacy Notice;
- The Information Technology & Logistics Department ("ITLD") which acts as a Data Processor for the GCDR;
- Regulatory Bodies, auditors and legal advisors; and
- Law Enforcement Agencies.

We do not share information relating to you outside of Gibraltar.

How long do we keep your information for?

We will retain your personal information in accordance with the applicable laws and regulations and in accordance with the retention policies of each relevant HMGoG Department from which we collect your information. We will securely dispose of your personal information when it is no longer required for the purposes stated in this Privacy Notice.

How do we secure & maintain your information



We are committed to taking appropriate measures which are designed to keep your personal data secure. Our technical and administrative procedures are designed to protect personal data from loss, theft, misuse and accidental, unlawful or unauthorised access, disclosure, alteration, use and destruction.

You should note that we limit access to the GCDR who need to know and have implemented various security controls to secure information stored on the GCDR, including authentication, encryption, logging and monitoring. We also run a recertification process whereby access is reviewed every 6 months or on a role change for a specific user.

Existence of automated decision-making (including profiling)

We do not use automated decision-making or profiling.

Your right as a data subject

You have certain rights regarding your personal information, including the:

The Right of Access: You have the right to request to see your personal information and learn how it is being used.

The Right to Rectification: If you believe your information may be inaccurate or incomplete you may make a request to have your information reviewed.

The Right to Erasure: You have the right to ask us to delete your personal data, for example, when it is no longer needed or if you withdraw your consent.

The Right to restrict the processing of your personal information: You have the right to ask us to limit how your personal data is used in certain circumstances. This means that you can request that we temporarily stop using your personal data. However, you should note that this right is not absolute and there may be instances in which we are required to use your data, for example, for legal claims or to protect someone else's rights.

The Right to object to the processing of your personal information: You have the right to object to how your personal data is used, for example for direct marketing. However, this right is not absolute, and we may still use your data if we can show strong reasons that outweigh your rights or if it's needed for legal reasons.

The Right to withdraw your consent: You can change your mind and take back your consent whenever it applies. If you've given us permission to use your personal data, you have the right to withdraw that at any time. Please note we do not rely on consent for the purposes of our processing.

The Right not to be subject to automated decision-making, including profiling: You have the right to challenge any decisions made without human intervention (automated decision making) in some circumstances. Please note that we do not use automated decision-making.

Your Right to complain: We try to meet the highest standards in order to protect your privacy. However, If you are concerned about the way in which we are managing your personal information and think we may have breached any applicable privacy laws, or any other relevant legislation, you have the right to raise any complaints regarding the processing of personal data, to us directly or contact the Data Protection Office ("DPO") employed by HMGoG who is responsible for monitoring our compliance with data protection requirements on dpo@gibraltar.gov.gi.



HM Government of Gibraltar

We will make a record of your complaint and seek to deal with the matter as soon as we can, and keep you informed of the progress of our investigation.

Contact Information

If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved to your satisfaction, you are entitled to make a complaint to the Information Commissioner under the Data Protection Act which is presently the Gibraltar Regulatory Authority. The Information Commissioner may be contacted on the following details:

Gibraltar Regulatory Authority

2nd Floor, Eurotowers 4

1 Europort Road

Gibraltar

Email: info@gra.gi

Phone: (+350) 200 74636

Fax: (+350) 200 72166

You also have the right to lodge a complaint with the supervisory authority in the country of your habitual residence, place of work, or the place where you allege an infringement of one or more of your rights has taken place if that is based in the EEA. If based in the UK, you have a right to complain to the Information Commissioner's Office ("ICO") under UK GDPR, and if based outside of the EEA, Gibraltar, or the UK, you may have additional rights to complain to a relevant supervisory or other competent body or authority in accordance with local privacy laws.

Additional Information

Data Protection Officer

The DPO employed by HMGoG is responsible for monitoring our compliance with data protection requirements.

Changes to this Privacy Notice

We may, from time to time, make changes to this Privacy Notice. Where we do so, we will notify the general public of our intention and of the amendments made to the Privacy Notice. Any amended notice will be effective immediately on the date stated therein.

Contact Information

The Data Controller for any personal data you provide us is His Majesty's Government of Gibraltar, Office of the Chief Secretary.

If you have any questions, concerns or comments or if you would like further information about this notice, how we handle your personal data, or otherwise wish to enforce your data protection rights please contact us at the above address or email us at: cs@gibraltar.gov.gi.

Additional Information



HM Government
of Gibraltar

Accessibility: If you would like this notice in another format (for example, audio, large print, braille) please contact us.

Children: Protecting children's privacy is important to us. Given the nature of our services, we expect to collect the personal data of persons under 16 years old which will be maintained in accordance with this Notice.

This privacy Notice is to be construed in accordance with Gibraltar law, and the courts of Gibraltar shall have jurisdiction to determine any disputes arising in relation to the interpretation or construction of the same.

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