

TRAX

Privacy Notice

Codentia Limited and its entities are committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during and after your relationship with us, in accordance with the Data Protection (Jersey) Law 2018 (DPJL). We are registered with the Jersey Office of the Information Commissioner, registration number 66799.

Codentia Limited is a "data controller" and this Privacy Notice is specific to one of its entities, known as 'TRAX'. This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

The DPJL says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
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.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The Kind of Information We Hold About You

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).

How Is Your Personal Information Collected?

We collect personal information about our customers when you contact us, create an account or provide us with your information for a specific purpose.

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 in the following circumstances:

1. When we need to share your information with the relevant authorities, e.g. Government contract tracing team, as part of a positive COVID-19 case investigation.
2. Where we need to comply with a legal obligation.
3. Where you have entered into a contract with us to provide you with a service.
4. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

1. Where you have given you consent to contact you for a specific purpose.

Change of purpose

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.

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.

Data Sharing

The specific purpose of TRAX is to provide a digital solution to venues and individuals to provide their information required as part of the COVID-19 contract tracing system. We are providing a safe and secure way for the data to be collected, stored, shared when required and disposed of after the required retention period.

We will only share your data in the following circumstances:

1. To provide information to the relevant authorities, e.g. Governments contact tracing team if the premises you attended forms part of a positive

COVID-19 case investigation.

2. To provide the account holder details of attendance at their venue.
3. To provide the account holder (if an individual) a list of premises visited.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Data Security

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 business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from our data protection lead, please contact data@trax.je

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.

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. The latest guidelines from Government is to retain your data for a maximum of 21 days, after which your data will be securely disposed of.

Rights of Access, Correction, Erasure, and Restriction

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 relationship with us.

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

- **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.

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove 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).
- **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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **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.
- **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 data@trax.je.

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.

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.

We will respond to your request within **4 weeks** of verifying your identity.

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific

purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact data@trax.je. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data Protection Lead

We have appointed a Data Privacy Lead to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Privacy Lead. You have the right to make a complaint at any time to the Jersey Office of the Information Commissioner, the supervisory authority for data protection issues.

Complaints

We'd like the chance to resolve any complaints you have; however, you also have the right to complain to the Jersey Office of the Information Commissioner about how we have used your personal data.

The details for each of these contacts are:

Codentia Limited, attention of the CEO

Office 7, 1st Floor, Forum 4, Grenville Street, St Helier JE2 4UF

Telephone +44 (0) 1534 748620 or data@trax.je

Office of the Information Commissioner – Jersey

2nd Floor, 5 Castle St, St Helier, Jersey JE2 3BT

Telephone +44 (0) 1534 716530 or Email: enquiries@dataci.org