

## **CJ International Services Ltd Website Privacy Statement**

**The Purpose** of this privacy statement is to explain how CJ International Services Ltd (CJIS) processes all personal data to fulfil its data protection responsibilities. This statement will be supplemented by 'specific to client' privacy notices when needed.

**The scope** of this statement covers all related activities by CJ International Services Ltd, trading as Norfolk's Data Protection Mardler, both of which are referred to as CJIS for the remainder of this privacy statement.

**The Role of CJIS** in data protection terms is that of a data controller where it determines the purpose and use of personal data collected. Once received it becomes the responsibility of the CJIS privacy manager (PM) contactable using [pa@cjinternationalservices.com](mailto:pa@cjinternationalservices.com). The PM ensures that processing accords with the latest UK data protection legislation.

**The sort of personal data collected by CJIS** will be basic contact details for the purposes of business development, preparing contracts, fulfilling service requests and setting up invoices. Banking details will also be collected for the purpose of paying creditors.

**CJIS' duty of confidentiality** means that CJIS staff will treat client with due respect and in confidence. It is only disclosed to those that need to know it. CJIS uses reasonable organisational and technical measures to ensure personal data is kept secure. The same duty of confidentiality is expected of all third parties with whom CJIS shares personal data and where appropriate, data processing agreements will be put in place.

**For the purposes of providing external data protection officer (DPO) services**, CJIS will enter into a data processing agreement was provided by the client.

**CJIS processes personal data against a lawful basis** and such instances are described below:

- We will pursue our legitimate interests to respond to your general enquiries and stay in touch with you for marketing purposes
- To comply with our legal obligations
- When it is necessary for the performance of a contract and its prior preparation
- When processing for a pre-defined purpose for which your consent has been sought and recorded prior to that processing commencing – but this can be withdrawn at any time by contacting the PM

**In all cases the processing of personal data by CJIS shall be:**

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary (and no more)
- Accurate and, when necessary, updated
- Kept for no longer than is necessary
- Processed in a manner that ensures appropriate security

**CJIS will share personal data**, but only on a 'need to know' basis with some or all of the following:

- Solicitors appointed by CJIS
- The Inland Revenue (HMRC)
- Accountants appointed by CJIS and only for accounting purposes
- An IT support company which is subject to a data processing agreement
- Unspecified recipients but only when compelled to do so for legal reasons

**CJIS will process your data in the UK** and all business data, including email, are backed up using a replicated systems based in the UK. Mobile phone contacts are stored on both office IT equipment and mobile phones which is backed up to Apple iCloud. CJIS uses appropriate technical and organisational measures to safeguard all personal data.

**CJIS follows a retention schedule** to determine the length of time it holds different types of personal data. The retention schedule is shown below:

- Routine correspondence for casual and contract related business in hard copy or in emails will be stored for 4 years
- Contact data is stored indefinitely unless a valid request to erasure is received from the interested data subject
- Financial records and invoices, which may include personal data, will be retained for 6 years after the end of the current tax year of processing
- By exception, documentation that includes personal data may be retained by CJIS beyond the schedule, but only for a specific purpose and only when CJIS believes it has a legitimate interest or a legal obligation to do so

**At the end of the retention schedule** CJIS will either return, destroy or delete your personal data and any associated emails or relevant documentation. If it is technically impractical to delete electronic copies of personal data, it will put it beyond operational use. It should be noted that CJIS allows up to 3 months after the retention schedule to complete the action.

**The CJIS websites** only use strictly necessary cookies for the website to be run properly. No attempt is made to identify individuals from the cookies being used. The websites may link to relevant websites that may be of interest to you. If these are used, CJIS has no control or responsibility for the content or processing of your personal data by these websites.

**The UK General Data Protection Regulation defines the rights** that you have (although these do not apply in all situations) and for convenience, these rights are shown below:

- Right to be informed as to how CJIS is processing your personal data – this is done through this statement or separate CJIS privacy notices
- Right to access your personal data held by CJIS which is done by making a 'Data Subject Access Request' (DSAR) to the CJIS PM
- Right to rectification of your personal data if you believe CJIS has collected it incorrectly or it needs to be updated
- Right to erasure of your personal data for which CJIS no longer has a legitimate

purpose to process

- Right to restrict processing under certain circumstances, during which time your personal data but will be out of operational use until the related matter is resolved
- Right to data portability of your personal data in a machine-readable version, but this only applies to data that has been provided with consent or under contract
- Right to object to CJIS processing your personal data for which it does not have a legal or contractual obligation
- Rights related to automated decision making and profiling (however CJIS does not use these techniques in its decision making)

**Further details on data subjects' rights** can be found on the Information Commissioner's Office (ICO) website: <https://ico.org.uk>.

**Raising concerns, exercising rights or making queries** about CJIS' processing of personal data can be done by contacting the CJIS PM. Please be aware that CJIS will need to verify your identity before responding fully; this may involve being asked for documentary proof that, in context, will enable CJIS to confirm your identity. Alternatively, you may choose to contact the ICO in the first instance.

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