

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

**The Purpose** of this privacy statement is to explain how CJ International Services Ltd, referred to as CJIS hereafter, processes personal data to fulfil its data protection responsibilities. The scope covers only that personal data processed via this website. Specific privacy notices for clients and third parties will be provided when necessary.

**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 [privacy@cjinternationalservices.com](mailto:privacy@cjinternationalservices.com). The PM ensures that all processing accords with the latest UK data protection legislation.

**The sort of personal data collected by CJIS** will be basic contact details sufficient to be able to respond to general enquiries made via the website.

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

**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 – although a separate privacy notice will be provided beforehand
- When processing for a pre-defined purpose for which your consent will be sought prior to the processing commencing – please note that consent can be withdrawn at any time by contacting the PM

**In all cases the processing of personal data** by CJIS shall be done in accordance with the principles of data protection.

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

- An IT support company which is subject to a data processing agreement
- A telephone answering service which is subject to a data processing agreement
- Other professional service representatives where we have your prior permission
- 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
- 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 website does not use non-essential cookies** and no personal data is held on the website server. Enquiries received via the website do so in the form of an email.

**The UK General Data Protection Regulation defines the rights** that you have, although these do not apply in all situations. 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 us which is done by making a ‘Data Subject Access Request’ (DSAR) to the PM
- Right to rectification of your personal data if you believe we have collected it incorrectly or it needs to be updated
- Right to erasure of your personal data for which we no longer have 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 (although we do 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 our processing of your personal data can be done by contacting the PM. Be aware that we will need to verify your identity before responding fully. This may involve asking you for documentary proof that, in context, will enable us to confirm your identity. Alternatively, you may contact the ICO directly without referring to us first, although naturally we would welcome the first opportunity to address your concerns or queries.