

PRIVACY NOTICE

The Progress Party respects your privacy and is committed to protecting your personal data.

This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

Please also use the Glossary to understand the meaning of some of the terms used in this privacy notice.

IMPORTANT INFORMATION AND WHO WE ARE

Purpose of this Privacy Notice

This privacy notice aims to give you information on how The Progress Party collects and processes your personal data through your use of this website, including any data you may provide through this website when you sign up to our newsletter, engage us to assist you with a service or take part in a competition.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Controller

The Progress Party which owns this website is the data controller and processor responsible for this website.

This privacy notice is issued on behalf of the The Progress Party so when we mention "Party", "we", "us" or "our" in this privacy notice, we are referring to The Progress Party responsible for processing your data.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise *your legal rights*, please contact The Progress Party data privacy manager using the details set out below.

Contact Details

Our full details are:

The Progress Party

Data privacy manager: Steve Luce

You have the right to make a complaint at any time to the Office of the Information Commissioner (ICO), the Jersey supervisory authority for data protection issues (www.oicjersey.org). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

Changes to the privacy Notice and your duty to inform us of changes



This version was uploaded January 2021 – historic versions will be archived here.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

THE DATA WE COLLECT 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).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes your name feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We may collect Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data).

If you fail to provide us with Personal Data



Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with services). In this case, we may have to cancel a relationship you have with us but we will notify you if this is the case at the time.

HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

- Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - Request to join the Party;
 - create an account on our website;
 - subscribe to our publications;
 - request marketing to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback.
- Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

Please see our **Cookie policy** for further details.

- Third parties or publicly available sources. We may receive personal data about you from various third parties and public sources as set out below:
 - (a) analytics providers such as Google based outside UK and or the EU;
 - (b) advertising networks such as Google, Facebook, Linked In based both inside and outside the UK and or EU; and
 - (c) search information providers such as Google or Bing based both inside and outside the UK and or the EU.
 - (d) identity and Contact Data from publicly available sources such as but not limited to the Jersey Electoral Register.

HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- 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.



- Where we need to comply with a legal or regulatory obligation.

Scroll down to the table below to find out more about the types of lawful basis that we will rely on to process your personal data.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message.

You have the right to withdraw consent to marketing at any time by **Contacting us**.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

Please **Contact us** if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below at schedule 1.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. We have established the following personal data control mechanisms:

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which policies, may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or become a member or if you provided us with your details when you entered a competition or registered for a promotion and, in each case, you have not opted out of receiving that marketing.

Third-party Marketing

We will get your express opt-in consent before we share your personal data with any company outside the Party for marketing purposes.

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by **Contacting us** at any time.

Where you opt out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a service purchase, service experience or other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.



For more information about the cookies we use, please see our **Cookie Policy**.

Change of purpose

We will only use your personal data 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 you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please **Contact us**.

If we need to use your personal data 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 data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of your personal data

We may have to share your personal data with the parties set out below for the purposes set out in the table above.

- Internal Third Parties as set out in the *Glossary*.
- External Third Parties as set out in the *Glossary*.
- Specific third parties such as those who provide services to us to manage or process services such as conveyancing services.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International transfers

We share your personal data within The Progress Party. This may from time to time involve transferring your data outside of Jersey and or the European Economic Area (EEA).

We ensure your personal data is protected by requiring all our group companies to follow the same rules when processing your personal data. These rules are called “binding corporate rules”. For further details, see [European Commission: Binding corporate rules](#).

Some of our external third parties are based outside Jersey and or the European Economic Area (EEA) so their processing of your personal data may involve a transfer of data outside the EEA.

Whenever we transfer your personal data out of Jersey and or the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further



details, see [European Commission: Adequacy of the protection of personal data in non-EU countries](#).

- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see [European Commission: Model contracts for the transfer of personal data to third countries](#).
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see [European Commission: EU-US Privacy Shield](#).

Please **Contact us** if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

PART 3 - DATA RETENTION

How long will you use my personal data for?

We will only retain your personal data 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.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Details of retention periods for different aspects of your personal data are available in our retention policy which you can request from us by **Contacting us**

In some circumstances you can ask us to delete your data: see *Request erasure* below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

YOUR LEGAL RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data. Please scroll down to find out more about these rights:



- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please Contact us.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these 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 your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

GLOSSARY

Lawful Basis

Legitimate Interest means the interest of our Party in conducting and managing our Party. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by **Contacting us**.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Comply with a legal or regulatory obligation means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.



Third parties

Internal third parties

Other companies and legal entities in the Party acting as joint controllers or processors and who are based in Jersey and United Kingdom and provide IT and system administration services and undertake leadership reporting.

External third parties

- Service providers acting as processors or joint controllers based in Jersey and the United Kingdom who provide IT and system administration services.
- Professional advisers acting as processors or joint controllers including lawyers, bankers, auditors and insurers based in Jersey and the United Kingdom who provide consultancy, banking, legal, insurance and accounting services.
- States of Jersey, Parishes, regulators and other authorities acting as processors or joint controllers based Jersey, the United Kingdom and Southern Ireland who require reporting of processing activities in certain circumstances.

Your Legal Rights

You have the right to:

Request access to your personal data (commonly known as a “data subject access request”). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data’s accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or



defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Modifications

We reserve the right, at any time, to modify, alter, or update. Any changes will be communicated on this page.



Schedule 1

(i) Campaigning and Communications

Purpose	Categories of Data Subject	Typical Data Categories
Canvassing Political Opinions	Electors	Name, Address, Electoral Roll Number, Telephone Number, Political Opinion, Contact Details, Marketing Preferences
Communicating with you via post about our policies, campaigns, events, fundraising appeals and opportunities to get involved with the party	Electors, Members/Former Members, Donors, Volunteers	Name, Address, Electoral Roll Number, Profiled Data
Communicating with you via electronic message about our policies, campaigns, events, fundraising appeals and opportunities to get involved with the party	Electors, Donors, Volunteers	Name, Address, Contact Details (email, phone, social media etc)
Sending you surveys and processing your responses	Electors	Name, Address, Electoral Roll Number, Political Opinion, Contact Details (email, phone, social media etc), Marketing Preferences, Issue Positions
Conducting petitions and presenting the signatories to the specified recipient	Electors	Name, Postcode, Contact Details (email, phone, social media etc), Political Opinion, Issue Positions
Conducting Online Surveys	Electors	Name, Address, Electoral Roll Number, Political Opinion, Issue Positions, Contact Details (email, phone, social media etc), Marketing Preferences
Showing you adverts via social media platforms	Electors, Members/Former Members, Donors, Volunteers	Email Address
Creating custom audiences for advertising on Social Media Platforms using existing	Electors, Members/Former	Email Address, Address, Political Opinion



Purpose	Categories of Data Subject	Typical Data Categories
supporters' details, information from our cookies/pixels and using those audiences to create "lookalikes"	Members, Donors, Volunteers, Supporters	
Registering for a campaign event(s) and administering the event	Electors, Members/Former Members, Supporters	Name, Address, Contact Details (email, phone, social media etc), Political Opinion
Polling Day Activities – e.g. "Knocking up" on the doorstep or via phone and "Telling" at polling stations	Electors	Name, Address, Electoral Roll Number, Polling Day Activity, Issue Positions
Signing up to Volunteer for the party and us sharing your details with the wider party	Volunteers	Name, Address, Contact Details (email, phone, social media etc), volunteering preferences, Political Opinion, Issue Positions
Maintaining and administering a database to store Electoral Register data, canvassing data, membership data, survey responses etc – including operating a test environment	Members, Donors, Electors, Volunteers, Candidates, Elected representatives, Supporters, Officers and Staff	Name, Contact Details (email, phone, social media etc), Addresses, Political Opinion, Age, Voting History, Relationships, Electoral Roll Information, Issue Positions, Memberships, Donations, Survey Responses, User profile names, Hashed Passwords, IP addresses, User authentication, Usage data and usage history, Free text notes, Titles, Suffixes, Gender, First Language, Positions Held, Location Information, Profiled data, Records of data subject rights requests, constituent record history, Telling and Knocking Up Information.



(ii) Membership and Donations

Purpose	Categories of Data Subject	Typical Data Categories
Processing your application for membership and administration of your membership	Members	Name, Address, Political Affiliation, Contact Details (email, phone, social media etc), Date of Birth, Payment Information
Inviting you to renew your membership and/or re-join the party	Members/Former Members	Name, Contact Details (email, phone, social media etc), Address
Communicating with you via electronic message about your membership, our policies, campaigns, events, fundraising appeals and opportunities to get involved with the party	Members/Former Members	Name, Address, Contact Details (email, phone, social media etc)
Conducting petitions and presenting the signatories to the specified recipient	Electors	Name, Postcode, Contact Details (email, phone, social media etc), Political Opinion, Issue Positions
Administering Membership Suspensions and Expulsions	Members/Former Members, Complainants, Witnesses,	Name, Details of Suspension/Expulsion, Contact Details, Address, Ethnicity, Religious or Philosophical Beliefs, Trade Union Membership, Health Data, Criminal Offence Data, Sex Life, Sexual Orientation, Political Opinion - incl Membership of a political party, Age, Social Media Activity (Public and Private), Personal Communications Data, Details of Complaint, Complaint Resolution, Witness Evidence
Process appeals against expulsion and suspension by Party Members	Members/Former Members, Complainants, Witnesses,	Name, Contact Details, Address, Ethnicity, Religious or Philosophical Beliefs, Trade Union Membership, Health Data, Criminal Offence Data, Sex Life, Sexual Orientation, Political Opinion - incl Membership of a political party, Age, Social Media Activity (Public and Private), Personal Communications Data, Details of Complaint, Complaint Resolution, Witness Evidence



Purpose	Categories of Data Subject	Typical Data Categories
Processing your donation or loan and checking your eligibility to donate or loan sums of more than £500	Donors	Name, Address, Electoral Roll Number, Contact Details (email, phone, social media etc), Payment Information, Political Affiliation
Reporting donations and loans to the Electoral Commission	Donors	Name, Address, Donation Amount, Political Affiliation
Maintaining and administering a fundraising database	Members/Former Members, Donors	Name, Address, Political Opinion, Contact Details (email, phone, social media etc), Donation History, Biographical Information, Occupation, Correspondence, Family Connections, Marketing Preferences, Date of Birth



(iii) Events

Purpose	Categories of Data Subject	Typical Data Categories
Registering for an event(s) and administration of the event	Attendees	Name, Address, Contact Details (email, phone, social media etc), Dietary Requirements, Biographical Information, Payment Information
Providing you with information about the event(s) for which you have registered	Attendees	Name, Contact Details (email, phone, social media etc)
Hosting Video Conferencing and Virtual Events	Electors, Members/Former Members, Donors, Volunteers, Elected Representatives	Name, Contact Details (email, phone, social media etc), IP Address, Political Opinion, Images and Recorded Images



(iv) Research, Due Diligence and Press

Purpose	Categories of Data Subject	Typical Data Categories
Political research using publicly available sources	Elected Representatives, Political Staff, Candidates, Members, Activists, Donors	Name, Publicly available information (e.g. occupation, social media posts, directorships, media history, property and financial holdings etc), Misconduct, Publicly available special category information (e.g. political opinion, trade union membership, criminal offences, etc)
Due diligence of prospective members, potential appointees, donors and volunteers using publicly available sources	Members, Donors, Supporters, Volunteers, Potential Appointees	Name, Publicly available information (e.g. occupation, social media posts, directorships, media history, property and financial holdings etc), Misconduct, Publicly available special category information (e.g. political opinion, trade union membership, criminal offences, etc)
Communication with media organisations	Elected Representatives, Political Staff, Candidates, Members, Activists, Donors	Name, Publicly available information (e.g. occupation, social media posts, directorships, media history, property and financial holdings etc), Misconduct, Publicly available special category information (e.g. political opinion, trade union membership, criminal offences, etc)



(v) Contacting us or visiting one of our offices

Purpose	Categories of Data Subject	Typical Data Categories
Contacting us by email, post, via our website “contact us” forms or telephone and processing and keeping a record of your correspondence	Electors, Members of the public	Name, Contact Details (email, phone, social media etc), Correspondence, Political Opinion, Incidental Special Category Data
Managing security and your safety when you visit our office	Visitors	Name, Time and date of visit, Person you are visiting, Log of your movements within our offices, CCTV Images, Details of accidents and/or security incidents
Reporting accidents and/or security incidents to relevant healthcare organisation or law enforcement authority	Visitors	Name, Details of accidents and/or security incidents



(vi) Finance

Purpose	Categories of Data Subject	Typical Data Categories
Processing Payments to Suppliers	Suppliers Staff	Name, Contact Details, Job Title
Processing Payments from donors, members and supporters and keeping a record for accounting purposes	Donors, Members, Supporters	Name, Address, Political Affiliation, Contact Details (email, phone, social media etc), Date of Birth, Payment Information
Preparing and Reporting Election Spending Returns to the Jersey Electoral Commission	Campaign Staff, Suppliers, Party Officers, Party Staff, Candidates, Election Agents, Volunteers	Name, Address, Expense Details, Job Title, Correspondence (for preparing returns)



(vii) Market Research and Opinion Polling

Purpose	Categories of Data Subject	Typical Data Categories
Performing Market Research to get a sense of political opinion	Electors	Name, Address, Telephone Number, district, Gender, Age, Profiled data, Issue positions, Political Opinion
Conducting Opinion Polling to get a sense of political opinion	Electors	Name, Address, Telephone Number, District, Gender, Age, Profiled data, Issue positions, Political Opinion