#### WHITEDOVE CEREMONIES LIMITED PRIVACY STATEMENT

Your Data Controller and Owner is Whitedove Ceremonies Limited ('WCL')

This privacy statement is issued in accordance with the <u>Data Protection (Bailiwick of Guernsey)</u>
<u>Law, 2017</u>

## Who are we?

WCL is co-owned and operated by Jayne White, Caryn Byrne and Jackie Ward. The White Dove team also includes other celebrants who are employed by WCL, offering non-religious ceremonies in the Channel Islands.

## What do we do?

White Dove provides non-religious, unique and personal ceremonies for all types of important family occasions. A new family member, weddings, anniversary or saying goodbye to a loved one.

#### How do we do it?

All data is collected when you contact us by email, messenger, telephone or any other method, through ongoing correspondence and when you meet with your celebrant to plan your ceremony. Only data you chose to share with the celebrants at WCL is retained and included in your ceremony and our records. This data is shared with you for your review and approval ahead of your ceremony date.

# What personal data to we collect?

WCL celebrants will collect and record your names, and the names of any other key party for your ceremony. We will reply to you once you contact us in the first instance, and we will need to further communicate with you by email and subsequently in person.

## Why do we collect personal data?

Data is collected solely for the purpose of fulfilling the provision of WCL products and services, which includes:

- Preparation of scripts for ceremonies.
- Communicating with other industry suppliers to facilitate the smooth running of a Ceremony
- For celebrants employed by WCL data is collected for the purposes of communication and payment of services
- Provision of Education and Training relevant to WCL employees.

# Our lawful grounds for processing your personal data.

You will have provided contact details to enable us to communicate with you regarding our service, we collect your First and Last name, Phone number and Email.

If you engage WCL to conduct a ceremony for you then we require other data to be provided on our booking form in relation to the date, time and venue of the ceremony.

If your ceremony includes any personal story details then we collect this data either in a face to face meeting and/or through email exchange.

If you visit our website whitedove.gg, anonymised usage data is collected by various online platforms to enable us to provide better services and includes hosting and backend infrastructure, infrastructure monitoring, analytics, displaying content from external platforms such as our Facebook page, re-marketing and behavioural targeting.

If you are an employee, we collect your Name, email, address, emergency contact and bank account details.

# What do we do with your personal data?

Data processing is carried out using personal computers and 3<sup>rd</sup> party IT applications hosted on the cloud, printed booking forms and handwritten notes taken during script meetings.

Handwritten notes taken by employees are destroyed after delivery of the ceremony.

Printed scripts are destroyed after delivery of the ceremony.

Electronic data is held for as long as necessary to complete the ceremony.

Electronic scripts written by celebrants are retained for reference for up to 10 years.

Some data will also be available to 3<sup>rd</sup> party cloud-based and automated services including email providers and online storage.

## **Data Retention.**

Data is processed at the places where WCL employees involved in the delivery of a ceremony are located, which may include transferring your data outside of Guernsey via cloud-based software which has data-centres located in various jurisdictions.

Data is retained for the duration of your ceremony and up to one year thereafter. Annual housekeeping is performed to destroy notes and data for completed ceremonies that is not required for future reference.

# Your rights.

You may exercise the rights regarding your data at any point:

- Withdrawing your consent at any time you have the right to withdraw consent previously given
- Right of access you have the right to learn what data is being processed
- Right of rectification you have the right to correct your data
- Right of erasure you have the right for your data to be deleted or otherwise removed
- Right to make a complaint

## Data Sharing.

WCL reserves the right to transfer the management and ownership of the data to future operators of the business, including the transfer of basic personal and business information required for the continuation and provision of ceremonies. Specifically, your name, email, address and phone, any notes, draft or completed scripts.

## Security

We take our data security responsibilities seriously and employ a variety of measures to protect our customer's data. This includes associate celebrant training and awareness, data audits, checks on third-party providers being GDPR compliant, review of our IT tools and internal procedures. We want to reassure you that we process the minimum amount of data required for the purpose of providing, operating and marketing WCL products and services

Please do not hesitate to get in touch with us if you have any further questions. To contact us, please email us at DPO@whitedove.gg

## How you complain to us.

You have the right to inspect the personal data we hold on you and can make a request for such an inspection. We will share with you all information we are able to, except where we may be prevented from doing so as a result of any legal, regulatory, contractual or similar obligation, where the

information cannot be separated from that of another data subjects and/or where the personal data forms part of any sensitive matter.

If you believe that any of the data, we hold on you is incomplete, inaccurate or invalid, you have the right to ask us to correct it. Please submit a request in writing to <a href="mailto:dpo@whitedove.gg">dpo@whitedove.gg</a> who will consider any requests and report the outcome to you.

# How to complain to the Authority.

As a data subject, if you are not satisfied with the way in which we have processed your data, or the response you have received from us in relation to a representation you have made, you have the right to submit a complaint to the supervisory authority in writing.

A complaint may be made where:

- 1. We breached or are likely to breach any provision of the law; and
- 2. You believe your personal data or your rights are affected or likely to be affected by the breach.

In Guernsey, complaints must be made to:

The Office of the Data Protection Authority, St Martins House, Le Bordage, St Peter Port, Guernsey GY1 1BR.

Email: <a href="mailto:enquiries@odpa.gg">enquiries@odpa.gg</a>
Tel: +44 (0) 1481 742074