



Gibraltar Financial Intelligence Unit

HM Government of Gibraltar

e-Nexus Privacy Notice (GDPR and DPA 2004)

Introduction

Welcome to the Gibraltar Financial Intelligence Unit's (GFIU) e-Nexus Privacy Notice.

The GFIU respects your privacy and is committed to protecting your personal data. This privacy policy 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.

This Privacy Notice is provided in a layered format so you can click through to the specific areas set out below.



Contents

1. Important information and who we are.....	1
2. The data we collect about you	2
3. How is your personal data collected?	3
4. How we use your personal data	3
5. Disclosures of data.....	4
6. Data security	4
7. Data retention	4
8. Your legal rights.....	6



1. Important information and who we are

Purpose of this Privacy Notice

This Privacy Notice aims to give you information on how the Gibraltar Financial Intelligence Unit (GFIU) collects and processes your personal data through your use of this website, including any data you may provide through this website when you use our product or service.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this Privacy Notice together with the Terms of Service for e-Nexus e-Learning system [the "Site"] so that you are fully aware of how and why we are using your data.

Controller

GFIU is the controller and responsible for your personal data (collectively referred to as "GFIU", "we", "us" or "our" in this Privacy Notice).

Our data protection officer (DPO) 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 DPO using the details set out below.

Contact Details

If you have any questions about this Privacy Notice or our privacy practices, please contact us in the following ways:

- Full name of legal entity: The Gibraltar Financial Intelligence Unit
- Email address: admin@gfiu.gov.gi
- Postal address: Suite 945, Europort, Gibraltar, GX111AA
- Telephone number: +350 20070211

You have the right to make a complaint at any time to the Information Commissioner (IC) if you are not satisfied with any aspect of the GFIU's processing of personal data or believe that we are not meeting our responsibilities as a data controller. In Gibraltar the IC is the Gibraltar Regulatory Authority who can be contacted at info@gra.gi. We would, however, appreciate the chance to deal with your concerns before you approach the IC so please contact us in the first instance.



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

We keep our privacy policy under regular review. 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 Site, we encourage you to read the privacy policy of every website you visit.

2. 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 as follows:

- **Identity Data** includes first name, last name, username or similar identifier, occupation, post or role of the company you work for.
- **Contact Data** includes email address.
- **Profile Data** includes your username and password, feedback and survey responses.
- **Usage Data** includes information about how you use our Site and services

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific Site 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.

When you use our Site, we do not collect any **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). Nor do we collect any information about criminal convictions and offences.



3. 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 information when you use our Site or when filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our services;
 - create an account on our Site;
 - complete a survey, give us feedback or contact us.

4. 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 we provide a service to you and we have an agreement in place eg our Terms of Service.
- 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 obligation.

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.

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
To register you as a Site User	(a) Identity (b) Contact	Performance of a contract with you
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact (c) Profile	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how users use our services)



To make improvements to products or services provided by GFIU	a) Identity (b) Contact (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop and improve our products/services)
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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.

5. Disclosures of data

We may share your personal data with the parties set out below:

- External third party service providers who we use in order to be able to provide you with our products or services, e.g. third party IT service providers.

6. 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.

7. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for.

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



Gibraltar Financial Intelligence Unit

HM Government of Gibraltar

personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means.

We will 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.



8. Your legal rights

Your information rights in relation to personal data considered as “general data” are:

- The right to obtain access to your personal data that we hold about you and other information specified in the GDPR.
- The right to ask us to rectify any inaccurate data that we hold about you.
- The right to request that we erase personal data about you that we hold.
- The right to request that we restrict processing of personal data about you that we hold. You can ask us to do this for example where you contest the accuracy of the data.
- There is no fee involved to access personal data. However, you may be charged a fee if the request is clearly unfounded, repetitive or excessive.
- Before responding to a subject access request, we reserve the right to request additional information from you should we need it to confirm your identity and verify who you say you are.
- We will always try to respond within one month to any subject access request. However, occasionally it may take longer if the request is particularly complex or if we have a number of requests, in which case, we will notify you within the month of the need for an extension of time.

To make any request relating to your data held by us, please contact the Gibraltar Financial Intelligence Unit on +350 20070211 or email admin@gfiu.gov.gi. You have the right to complain to the Information Commissioner if you are not satisfied with any aspect of the GFIU’s processing of personal data or believe that we are not meeting our responsibilities as a data controller.

You may have rights to other remedies.