

CJ International Services Ltd

Public Privacy Notice

The Purpose of this privacy notice is to explain how CJ International Services Ltd (“CJIS”) processes your personal data to fulfil our data protection responsibilities in general terms. 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 for the personal data being collected and the means of processing. Once received it becomes the responsibility of the privacy manager (“PM”) who will ensure that all processing is done in accordance with the latest UK data protection legislation. The PM is contactable by email using pa@cjinternationalservices.com.

The sort of personal data collected by CJIS will be basic contact details sufficient to be able to respond to business related enquiries, networking and contract preparation.

CJIS’s duty of confidentiality means that we 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 we share your personal data and, where appropriate, we have data processing agreements in place. CJIS adopts 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 if we stay in touch with you for networking and 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purpose for which your consent will be sought prior to the processing commencing – please note that consent can be withdrawn at any time by contacting the PM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
- 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. These are backed up using a replicated system based in the UK. Mobile phone contacts are stored on both office IT equipment and mobile phones which are backed up to Apple iCloud.

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 are stored indefinitely unless we receive a valid request from you to erase your personal data

- By exception, documentation that includes your personal data may be retained by us beyond the schedule, but only for a specific purpose and only when we believe we have a legitimate interest or a legal obligation to do so

At the end of the retention schedule we will either return, destroy or delete your personal data and/ or any associated emails and 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 ends to complete this action.

The CJIS website does not use non-essential cookies and no personal data is held on the website server. Enquiries sent via the website will be received as 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 notice or specific to target privacy notices
- Right to access your personal data held by us which is done by making a (Data) Subject Access Request (SAR) 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 will be put 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 our processing of your personal data for which we do not have a legal or contractual obligation
- Rights related to automated decision making and profiling (although we do not use these techniques in our 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 we always would welcome the first opportunity to address your concerns or queries.