



BERMUDA LAND MANAGEMENT CORPORATION (BLMC) PRIVACY POLICY

Title of Policy: Data Protection and Privacy Policy

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Position of Author: Human Resources Manager and Privacy Officer

Date: November 2024

Purpose: Detailing the use of BLMC's data

1.0 Overview

- 1.1 BLMC takes the privacy and security of your data seriously. Our business requires the use of information or “data’. We intend to comply with legal obligations under the Personal Information Protection Act 2016 (PIPA) in respect to data privacy and security.
- 1.2 This policy applies to all customers, suppliers, consultants, and other categories of data subject. All parties are considered as ‘data subjects’ for the purpose of this policy.
- 1.3 BLMC has separate policies and privacy notices in place in respect of Human Resources and employees.
- 1.4 BLMC has measures in place to protect the security of data in accordance with PIPA.
- 1.5 BLMC will hold data in accordance with PIPA legislation and will dispose of it as per our Data Retention and Disposal Policy.
- 1.6 BLMC is a ‘data controller’ for the purposes of data. This means that we determine the purpose and means of the processing of your personal data.
- 1.7 This policy explains how BLMC will hold and process your data. It explains the rights of data subjects.
- 1.8 This policy is fully compliant with PIPA. Should there be any discrepancies between contracts and this policy, BLMC will comply with PIPA 2016 Act.

2.0 Data Protection Principles

2.1 Data must be processed in accordance with six 'Data Protection Principles'. It must:

- Be processed fairly, lawfully, and transparently.
- Be collected and processed only for specified, explicit, and legitimate purposes.
- Be adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
- Be accurate and kept up to date. Any inaccurate data must be deleted or edited promptly.
- Not to be kept for longer than is necessary for the purposes for which it is processed; and be processed securely.

3.0 How We Define Data

3.1 Personal data is information which relates to a person who can be identified from that data (a 'data subject') on its own, or when taken together with other information which is likely to come into our possession. It does not include anonymous data.

3.2 This policy applies to all data whether stored electronically or on paper.

3.3 Personal data is provided by you to us, or it could be created by us. It could be created during a contract process or during the course of services.

4.0 How We Define Processing

4.1 Processing means any operation which is performed on data such as:

- Collection, recording, storage.
- Adaption or alteration.
- Retrieval, consultation, or use.
- Disclosure by transmission, or otherwise making available.
- Restriction, destruction, or erasure.

5.0 How We Will Process Data

5.1 BLMC will process data in compliance will all PIPA obligations.

5.2 We will use your data for:

- Contractual purposes.
- Complying with any legal obligations.

- If it is necessary for legitimate interests.

BLMC may process data for these purposes without your knowledge or consent. We will not use data for unrelated purposes.

If you choose not to provide us with certain data, we may not be able to carry out certain duties or parts of contracts.

5.3 Everyone who works for BLMC, or on behalf of BLMC, has responsibility for ensuring that data is collected, stored, and handled appropriately. This is in line with BLMC's Data Retention policy.

5.4 BLMC's Privacy Officer (PO) is the Human Resources Manager who is responsible for reviewing this policy and updating BLMC's Board of Directors on data protection responsibilities and all risks in relation to the processing and storage of data. All questions may be directed to the PO.

5.5 Employees will only have access to information that is essential to their job function and are authorized by BLMC to do so. We will only use data for the specified lawful purpose in which it was obtained.

6.0 How We Will Deal with a Data Breach

6.1 We have robust measures in place to minimize and prevent data breaches. Should a data breach occur, then we will take notes and evidence of that breach. If the breach is likely to result in a risk to personal data, then we must notify the Office of the Privacy Commissioner Bermuda within 72 hours. We will also contact all affected parties within 72 hours.

7.0 Subject Access Requests

7.1 Data subjects may make a 'subject access request' (SAR) to discover the data that is held regarding them. This request must be made in writing.

7.2 If you would like to make an SAR in relation to your personal data, provide a written request to the PO. They must respond within 14 days of receipt unless the request is complex or numerous in which response time may be extended by a month.

7.3 There is no fee to request an SAR. However, should your request be unfounded or excessive, we may charge a reasonable administrative fee or refuse to respond to your request.

8.0 Data Privacy Rights

8.1 Right to know what personal data we process, how and on what basis.

8.2 The right to access personal data through a subject access request (see above).

8.3 Correction of inaccuracies. Contact PO for corrective action.

8.4 The right to request erasure of data where we were not entitled by law to process it, or it is no longer necessary to process. To do so contact the PO.

8.5 The right to object if we process personal data for the purpose of direct marketing.

8.6 The right to be notified of a data breach where personal data is involved.

8.7 For any purposes that are not deemed legitimate purposes, and your consent is required; the right not to consent or withdraw consent. To withdraw consent, contact the PO.

8.8 You have the right to make a complaint to the Privacy Commissioner. You can do this by contacting the Office of the Privacy Commissioner Bermuda directly, Full contact details including helpline number may be found on the Office of the Privacy Commissioner Bermuda website (www.privacy.bm) or by calling (441)543-7748. This website has further information on rights and obligations under the PIPA 2016 Act.

8.9 To contact Human Resources or PO, call (441)234-1709 or email hr@blmc.bm.