## **IOM Treasury**

#### **Privacy Notice**

## MiCard Benefit Payment Services at Isle of Man Post Offices

This privacy notice explains how and why the Social Security Division of Treasury (a Department of the Isle of Man Government) uses your personal data for the MiCard payment service.

The MiCard payment service is provided on our behalf by the Isle of Man Post Office.

The **Social Security Division, Treasury ("SSD")** is a **Controller** as defined by Article 4(7) of the GDPR as applied to the Isle of Man, which means that it makes the decisions as to how your personal data is processed.

The Isle of Man Post Office and Sub Post Offices ("IOMPO") provide the payment service on behalf of SSD and so are Processors for the MiCard service. IOMPO is instructed by us to ensure the safe, accurate and timely payment of social security benefits and state pensions to claimants at their designated Post Office counter.

#### Why we process your personal data

We use your personal data to carry out our legal duties and obligations to facilitate the payment of benefits and state pensions. Table I overleaf shows what personal data we collect and how we use it.

### Legal Basis we use to process your personal data

Your eligibility for and entitlement to receive payments of benefits and state pensions is set down in law, for example, the Social Security Administration Act 1992, the Social Security Contributions and Benefits Act 1992, the Pensions Act 2014 and the Jobseekers Act 1995 (as those Acts of the UK Parliament are applied in the Isle of Man).

We therefore collect data to carry out tasks in the public interest or in the exercise of our official authority.

IOMPO has a contractual obligation to Treasury to check and verify you are the correct MiCard account holder each time you use your MiCard to receive cash at your nominated Isle of Man Post Office. IOMPO do this by either using the photo on your card, if you have consented to it being taken and printed on your card, or by asking you to produce photographic ID each time you use your MiCard to collect your state pension or benefits.

We retain your Photo ID Consent Form to ensure your permission is valid for the period of MiCard use.

IOMPO will only take your photo if you provide them with your consent on your Photo ID Consent Form, which we will then retain for the period of MiCard use.

### How long do we keep your personal data for?

We keep your personal data as outlined in Table I below. This includes benefits or pensions payment transaction records for up to 6 years plus the current financial year, and your Photo ID consent form for the life-span of your MiCard (which may be up to 3 years).

Table I: MiCard Enrolment, Issue, Activation and Use

Type of Data	Purposes for which your data will be used	Retentio n Period	Reason for Retention	Our Legal basis for processing			
Personal Data held by Treasury							
Enrolment Data: Name, address, date of birth, national insurance number	To enrol you onto the MiCard service, to provide you with your personal MiCard and to identify you during your enrolment in the scheme	3 years	The life-span of the MiCard	Public task to exercise our official authority			
Type and amount of benefit or pensions payment (including enrolment data)	To ensure correct use and payment of public money  To maintain accurate records of accounts to which you are entitled and receive	6 + I years	This is the statutory period we are required to keep financial records	Public task to exercise our official authority			
	To help prevent fraudulent use of your data and fraudulent claims to public funds						
Personal Data used to verify your identity							
Passport, driver's licence, tenancy agreement, utility bill, bank statement	Visual check of these personal documents for proof of identity and proof of address as part of our 'know your customer' requirements.	None		Public task to exercise our official authority			
MiCard photograph of your face	Visual check of MiCard to verify identity	None		Consent			
	Personal data on your	MiCard					
Photograph of your face	Taken by Post Office staff to print on your MiCard  Stored on your E-Money account at IOM Post Office	l day	To enable the MiCard to be printed on-Island and presented to Counter Staff at IOM Post Office when verifying your identity	Consent			
	Printed on your MiCard with your consent as proof of your identity	3 years	To enable the MiCard to be printed on-Island and presented to Counter Staff at IOM Post Office when verifying your identity	Consent			
Your signature	Used by Post Office counter staff to validate the MiCard holder's provided signature with the retained electronic copy of the card holder's signature provided at MiCard activation.  To identify you and ensure you receive the correct payment.	3 years	The life-span of the MiCard	Public task to exercise our official authority			

	Your Photo ID conse	nt form		
Your name, address, National Insurance Number, Date of Birth and signature	To evidence your consent to the taking, temporary storage and printing of your photograph on your MiCard	3 years	The life-span of the MiCard	Consent

### Sharing the information we collect about you

We will share your personal data with the following organisations in order for you to enrol, receive, activate and use your MiCard to receive benefits and state pensions:

- Our processor and their sub-processors:
  - Isle of Man Post Office
  - Isle of Man Sub-Post Offices

We will never transfer your data outside of the Isle of Man.

# Your rights

#### To ask if we hold personal information about you

You can ask to see any information we hold about you by making a Subject Access Request.

#### You can review your personal information and ensure it is accurate

Where possible we will provide you with access to the information we hold about you so that you can view this information and provide a means for you to have this information changed if it is not accurate.

#### To remove your personal information

In certain circumstances you can ask for your information to be deleted. Please note that as part of the Social Security's statutory functions some information may need to be retained.

### To withdraw your consent for us to take, store and print on your MiCard your photograph

The taking, printing and storing of your photograph is optional. You **DO NOT** have to give consent for the use of your photograph to use the MiCard service. You have the right to change your mind and withdraw your consent for the use of your photograph. You can do this by contacting us directly by 'phone at 686415 or email us at: MiCardenquiries@gov.im.

# To make a complaint

If you are unhappy with the way we deal with your personal information you can submit a complaint to the Data Protection Officer for the Treasury who will work with you to resolve any issues.

Email: <a href="mailto:DPO-Treasury@gov.im">DPO-Treasury@gov.im</a> Telephone: +44 1624 686393

Financial Governance Division, First Floor, Central Government Offices, Bucks Road, Douglas, IMI 3PX, Isle of Man

The <u>Isle of Man's Information Commissioner</u> is the independent authority responsible for upholding the public's information rights and promoting and enforcing compliance with the Island's information rights legislation. You can contact the Information Commissioner on 693260 or by emailing <u>ask@inforights.im</u>. Or visit the Information Commissioner's website at <a href="https://www.inforights.im/contact-us">https://www.inforights.im/contact-us</a>.

You have the right to request the Information Commissioner to undertake an assessment as to whether the processing of your personal data has been carried out in accordance with the provisions of the Manx Data Protection Legislation.

### The contact details of the Social Security Division, Treasury are:

Markwell House, Market Street, Douglas, IMI 2RZ

Telephone: (+44 1624) 685656

### Will this privacy notice change?

This Privacy Notice may change. We will not reduce your rights under this Privacy Notice without your consent. If any significant change is made to this Privacy Notice we will provide a prominent notice on the <a href="Treasury Privacy Notice webpage">Treasury Privacy Notice webpage</a> so you can review changes.

# **Privacy Notice Distribution:**

Markwell House Reception: Markwell House, Market Street, Douglas, IMI 2RZ

Isle of Man Post Office: Postal headquarters, Spring Valley Industrial Estate, Douglas IM2 IAA

 $\textbf{Social Security Webpage:} \ \underline{www.gov.im/about-the-government/departments/the-treasury/social-security-departments/departments/the-treasury/social-security-departments/the-treasury/social-security-departments/the-treasury/social-security-departments/the-treasury/social-security-departments/the-treasury/social-security-departments/depart$ 

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IOM Post Webpage: <a href="https://www.iompost.com/privacy-notices/">https://www.iompost.com/privacy-notices/</a>

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