



Centennial Bermuda Foundation's Privacy Notice and policies on respecting and protecting privacy rights under the Personal Information Protection Act 2016

(Updated 4Feb21)

- A. All organisations in Bermuda including charities that receive and use personal information must operate in compliance with the requirements of the Personal Information Protection Act 2016 (PIPA) which legislation is designed to protect the rights of individuals over their personal information, particularly information that is sensitive and not normally available to the public.**

Under PIPA personal information is widely defined and includes any information about a particular individual such as name, age, address, activities they are involved in, schools that they have attended, employment history, family history, medical/health information, financial circumstances, spending habits – basically anything about the individual including sensitive personal information. PIPA defines sensitive personal information as any personal information relating to an individual's place of origin, race, colour, national or ethnic origin, sex, sexual orientation, sexual life, marital status, physical or mental disability, physical or mental health, family status, religious beliefs, political opinions, trade union membership, biometric information or genetic information.

Centennial Bermuda Foundation prior to and since the enactment of the PIPA legislation has always taken great care to protect personal information which it receives and to restrict its use in accordance with the reasonable expectations of the provider (the person to whom it relates). Unless written consent is given by the provider, all personal information received which is not publicly available is treated by Centennial as confidential and used only for the purpose for which it is given.

Centennial is provided with personal information from a number of sources with the primary providers being:

- Directors, Committee members, employees, consultants and other service providers
- Applicants for grants with most applicants being registered charities
- Student applicants for scholarships

Centennial only provides access to personal information which it receives to those persons who work within or for Centennial as a Director, Committee member, employee, consultant or professional service provider on a strict need to know basis and only if the recipient has agreed to keep the information confidential or is bound by professional rules to keep the information confidential.

B. Any personal information received from any provider will be protected by Centennial and only used in accordance with the requirements and conditions of PIPA. Centennial's general policies are as follows:

1. Centennial adheres to the provisions, spirit and intent of PIPA.
2. Personal information is only obtained where Centennial has determined that there is a legitimate and reasonable need for the information in order to carry out its obligations and mandate which need has been explained to the provider, and the provider has consented in writing to provide the information or where the law requires Centennial to obtain and retain such information.
3. Personal information (which is not generally available to the public) received by Centennial is only used and disclosed on a strict need to know basis.
 - in accordance with the written consent of the provider
 - as required/authorised by law
 - to perform a contract to which the provider is a party
 - to respond to an emergency that threatens life, health or security
 - where use of the information is necessary in the context of an individual's present, past or potential employment or consultancy relationship with Centennial
 - where use of the information is needed to reasonably evaluate the provider's grant or scholarship application
4. Centennial will take reasonable measures to secure, protect and control the dissemination of personal information that it receives.
5. Directors, Committee members, employees, consultants and professional service providers of Centennial are only given access to personal information received by Centennial on a legitimate, reasonable need to know basis and only if they are bound in writing or by professional rules of conduct to treat the information confidential.
6. A provider of personal information is free to request in writing and receive not later than 45 days from the day Centennial receives the request, written confirmation of what personal information Centennial has retained and who has been given access to the information and why.
7. Centennial reserves the right in respect of its Directors, Committee members, employees and consultants to retain personal information as long as may be consistent with best practices pertaining to business record retention but normally such information will be destroyed after 6 years from the date the person's relationship with Centennial has ended.
8. Centennial is committed to ensuring that the personal information it receives is accurate and kept up to date to the extent necessary for the purpose of use. A provider of personal information may by writing to Centennial amend any such information for the purpose of providing updates and correcting any mistakes, errors or omissions, and Centennial shall maintain a record of this supplemental information.

9. Upon the written request of a provider of personal information that Centennial destroy information in its possession, Centennial will comply with the request provided the retention of the personal information is no longer reasonably required by Centennial or by law.
10. Centennial may use relevant personal information where necessary for the purpose of pursuing a claim against or defending a claim by the provider.

C. Specific policy for applicants for grants and scholarships

1. An applicant, by completing and submitting a Centennial application form for a grant or scholarship, consents to provide Centennial with the requested information including personal information about the applicant. Centennial shall treat any personal information received confidential and will keep the information secure; will only use the personal information for the purpose of considering the application or for scientific, statistical or historical research (subject to safeguarding the identity of the applicant); will restrict access to Directors, Committee members, employees, consultants or professional service providers of Centennial on a need to know basis who have undertaken in writing to keep personal information confidential.
2. The applicant consents to any reasonable publicity or recognition that Centennial may wish to give in the event that the applicant receives funding provided no personal information is disclosed which a reasonable person would consider private.
3. Centennial will not disclose or publish that an applicant applied and did not receive funding.
4. Subject to meeting any scholarship application deadlines, any personal information can be amended by an applicant at any time in writing to Centennial.
5. Personal information from applicants for grants and scholarships is kept for as long as is reasonably required by Centennial or by law.
6. Centennial reserves the right to carry out research, extract data and trends from personal information received, including sensitive personal information, for the purpose of evaluating the needs of the community and the success of Centennial's programmes but under no circumstances will the data be used in a manner where the identity of the provider could be ascertained. Such research, data and trends may be published.

D. Nothing set out in Centennial's general or specific policies, shall be taken to restrict any use of personal information that is expressly permitted by PIPA such as personal information that is publicly available or where the use of the personal information is within the reasonable expectations of the individual to whom the information relates.

For further information, please contact Centennial's Privacy Officer, Mrs. Allison Towlson (Managing Director) by email at atowlson@centennial.bm or by telephone at 707-0215.