



Cayman Islands Government
Department of Facilities Management
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Version Control Notice:

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Privacy Notice

1. Scope

The Cayman Islands Government Department of Facilities Management (the “DFM”) respects your privacy and takes care in protecting your personal data. As a data controller, we comply with the Cayman Islands Data Protection Act (2021 Revision) (the “DPA”). This privacy notice (“Privacy Notice”) demonstrates our commitment to ensuring your personal data is handled responsibly and applies to the processing of personal data by the DFM.

This Privacy Notice does not apply to personal data processed for the purposes of human resource management, financial management, procurement or audits involving the operations of the DFM. This is because the DFM is within the portfolio of the Ministry of Planning, Lands, Agriculture, Housing, Infrastructure (the “Ministry”). As a “Civil Service Entity”, a Ministry includes all of its departments, units and sections. Therefore, the Ministry as a Civil Service Entity is the data controller for these processing activities. For information about how your personal data may be used by the Ministry as a data controller, please visit gov.ky/pahi/privacy-notice.

This Privacy Notice only applies to our employees in a limited capacity, as they are covered under a separate Employee Privacy Notice where their personal data are being processed by the Ministry for HR purposes. However, this Privacy Notice does apply to our employees’ personal data if the personal data are processed by the DFM for the purposes of facilities management, including physical security of the Government Administration Building.

2. What Personal Data We Collect

Personal data collected by the DFM may include sensitive personal data, such as health and medical data, and is limited to what is necessary for our processing activities.

The DFM may collect the following information directly from you or from other sources:

- a. Your name, contact details and other personal data provided through our online facility booking portal app.univerusrec.com/fmdpub/facilities/index.asp, or through Microsoft Outlook if you are a civil servant using the calendar feature to book rooms in the Government Administration Building or other government facilities managed by the DFM, including details of requests, bookings and any payments;
- b. Personal data you or a third party provide when you visit the DFM offices or any government facilities under our remit, or when you contact us by email or telephone. This may include your name, contact details, and relevant information about booking or visiting a government facility managed by the DFM;
- c. If you are a civil servant or other public official with authorised access to the Government Administration Building and/or to the Cayman Islands Environmental Centre, your employer or another third party, including the Portfolio of the Civil Service, may share your name and basic employment details, including your employee identification number, department, title, photograph, current employment status, and authorised physical working area(s) and hours;
- d. Images of you collected via CCTV, your location data collected via access fobs, physical sign-in sheets or other systems, and other personal data collected through lawful and appropriate security monitoring and control systems at government facilities managed by the DFM;
- e. Your name, department, title, contact details and vehicle details, if you have specific parking privileges and/or use electric vehicle (EV) chargers in the employee lot at the Government Administration Building;
- f. Your name, contact details and any other information you may provide in a maintenance, technology or other service request submitted via our FMX work order management system, fmd.gofmx.com;

- g. If you have a mobility, hearing, sight or other impairment which may impede your self-evacuation from the Government Administration Building in the event of a fire or other emergency and you want the DFM to collaboratively develop a Personal Emergency Evacuation Plan for you, we will collect your name, contact details, department, workstation location, and basic information related to the impairment(s);
- h. Any information you choose to provide when interacting with the DFM. If you ask questions about public services and programmes and/or if you provide information about your relationship with a government agency, including one that is located in a facility where we provide reception services, this may also reveal additional personal data;
- i. Employment and other information that third parties may provide for authentication purposes;
- j. Any other personal data where the collection is necessary to achieve our lawful purpose(s)

3. How We Use Your Personal Data

The purpose of the Civil Service is to make the lives of those we serve better. We are dedicated to supporting the elected government by delivering caring, modern and customer-centred public services and programmes, which deliver value for money. The DFM manages the following government buildings and facilities in Grand Cayman:

- a. Government Administration Building – 133 Elgin Ave, George Town
- b. Cayman Islands Environmental Centre – 580 North Sound Road, George Town
- c. The Constitution Hall – 43 Fort Street, George Town
- d. South Sound Civic Centre – George Town
- e. James Manoah Bodden Civic Centre – Bodden Town Road
- f. Ebenetus Hall Civic Centre – Breakers
- g. Elliott Conolly Civic Centre – Gun Bay
- h. William Allen McLaughlin Civic Centre – 80 John Mclean Drive, East End
- i. Craddock Ebanks Civic Centre – 923 North Side Road, North Side

The DFM may use your personal data for the following purposes:

- a. Effectively managing all government facilities under our remit, including physical security and the health, safety and wellbeing of occupants;
- b. Implementing policies, providing services and programmes, and managing your relationship with us;
- c. Confirming your eligibility for a non-profit organisation (NPO) discount or any other special rate or provision when booking any of our facilities;
- d. Responding to your inquiries;
- e. Verifying your identity;
- f. Managing bookings at government facilities managed by the DFM, including any payments;
- g. Issuing Cayman Islands Government Employee ID cards and ID cards for members of the National Emergency Operations Centre (“NEOC”);
- h. Issuing parking passes, RFID vehicle tags and RFID key fobs to access the Government Administration Building and/or the Cayman Islands Environmental Centre, including restricted areas and parking areas;
- i. Issuing and managing landline telephone extension numbers, physical handsets and softphones;

- j. Communicating and interacting with you, including providing relevant and useful information to occupants of the Government Administration Building and other people we serve;
- k. Statistical and other reporting, both internally and externally;
- l. Supporting public authorities whose facilities are managed by the DFM;
- m. Third parties may verify personal data that you provide to the DFM and the DFM may also verify personal data that you have provided to a third party, e.g. in the case of incident or accident reporting, your name and contact details may be shared to validate a claim or support an investigation;
- n. Seeking legal advice, and exercising or defending legal rights; and
- o. Complying with our legal obligations, including all legislation that applies across the public sector, e.g. legislation that provides for records and information management.

4. How We Share Your Personal Data

The DFM may share your personal data as required, including under applicable legislation, with recipients that include our data processors and third parties. We will only share your personal data as permitted by the DPA.

Your personal data may be shared with the following recipients to provide you with services and to support our public functions and operations:

- a. **With other public authorities:** Personal data may be shared with other public authorities – here, “public authorities” means Ministries, Portfolios, Offices, Departments, Statutory Authorities, Statutory Bodies and Government Companies – for the purposes set out in this Privacy Notice. In particular, we may share your personal data with a public authority that has offices located within a facility managed by DFM if you are an employee or other person with authorised access to their premises, or if you are a visitor attending a scheduled appointment or meeting or otherwise visiting that public authority. We may also share your personal data with any public authority conducting a lawful investigation that requires this information.
- b. **With data processors external to the CIG:** Personal data may be shared with persons providing services to the DFM as a data processor in compliance with the DPA. When they are acting as data processors, these service providers are only able to use personal data under our instructions. We engage data processors for a variety of processing activities, which may include:
 - i. Information Technology, including to support our customer service management (Zendesk), facilities and maintenance operations (FMX), and booking of civic centres and other facilities by the public (Univerus Rec);
 - ii. Closed-Circuit Television (CCTV) and other physical security controls (Security Centre);
 - iii. Records and Information Management, including storage facilities;
 - iv. Security operations and fraud prevention.

In limited circumstances, service providers who act as data processors for the DFM may also act as a separate data controller in relation to their own purposes for processing your personal data, e.g. to provide customer support, or for analytics or machine learning in order to improve their services. These are unrelated to the purposes for which the DFM processes your personal data and should be clearly and directly disclosed to you by the service provider through their own separate privacy notice. However, you may contact us to ask about our current service providers and specific instances, if any, that we are aware of where your personal data may be processed for a service provider’s own purposes.

- c. **With legal advisors and other persons if required by law or in relation to legal proceedings or rights:** Personal data may be disclosed as legally required, for the purpose of or in connection with proceedings

under the law, if necessary to obtain legal advice, or if the disclosure is otherwise necessary to establish, exercise or defend legal rights. This may include disclosing your personal data for the following purposes:

- i. Seeking legal advice;
 - ii. Exercising or defending legal rights;
 - iii. Complying with internal and external audits or investigations by competent authorities;
 - iv. Complying with information security policies or requirements; and
- d. **With other third parties:** Personal data may be disclosed to other third-party recipients for the purposes set out in this Privacy Notice and in accordance with the DPA.

5. Our Legal Bases for Processing Your Personal Data

Depending on applicable laws and other circumstances, the DFM will rely on specific legal bases, or “conditions of processing”, under the DPA to process your personal data. These may include:

- a. A **legal obligation** to which the DFM is subject to, e.g. to comply with various obligations under the Data Protection Act (2021 Revision) and Data Protection Regulations, 2018, and the National Archive and Public Records Act (2015 Revision);
- b. To exercise **public functions**, e.g. to manage the government facilities listed in section 3 of this Privacy Notice;
- c. To perform or enter into a **contract** with you, e.g. to provide goods and services;
- d. To protect your **vital interests**, e.g. to protect your health and safety, including in emergency situations;
- e. For the purposes of **legitimate interests** pursued by the DFM or by a third party or parties to whom the personal data may be disclosed, e.g. if a public authority asks us to disclose your personal data in the course of a disciplinary investigation or an investigation into a security incident or data breach; and
- f. Your **consent**, e.g. to administer polls or surveys.

Where we process your sensitive personal data, we will also meet a second legal basis. These may include:

- a. To exercise our **public functions**;
- b. In relation to **legal proceedings**, including obtaining legal advice and otherwise establishing, exercising or defending legal rights;
- c. To protect your **vital interests** or the vital interests of a third party, e.g. in emergency situations; and
- d. Your **consent**.

6. Children’s Personal Data

The DFM may collect personal data relating to children under the age of 18 to enable us to carry out our functions. We may collect children’s personal data for any of the purposes set out in section 3 of this Privacy Notice.

7. Security and International Transfers

The DFM has put in place appropriate technical, physical and organisational measures in order to keep your personal data secure. These safeguards to maintain the confidentiality, integrity and availability of your personal data may include:

- a. Developing and maintaining written plans to identify, prevent, detect, respond to, and recover from

security threats, events and incidents;

- b. Developing robust authentication procedures for accessing all systems that store personal data;
- c. Maintaining systems, software and applications, anti-virus software, firewalls, and other computer security safeguards, and appointing appropriate personnel to be responsible for keeping such safeguards up to date; and
- d. Requiring Data Processors who process personal data on behalf of the DFM to maintain appropriate security measures

The DFM will not transfer personal data to countries or territories that do not ensure an adequate level of protection for personal data.

We will only transfer your personal data to a country or territory that ensures an adequate level of protection for your rights and freedoms in relation to the processing of your personal data, unless there is a relevant exemption or exception under the DPA. Exceptions may include your consent or appropriate safeguards.

8. How Long We Keep Your Personal Data

The DFM may store your personal data for as long as we need it in order to fulfil the purpose(s) for which we collected your personal data, and in line with any applicable laws. This includes the National Archive and Public Records Act (2015 Revision), which governs the creation, maintenance and disposal of all public records. Sometimes, we may anonymise your personal data so that it is no longer associated with you.

9. Your Rights

The DFM will respect and honour your rights in relation to your personal data and implement measures that allow you to exercise your rights under the DPA and other applicable legislation.

In accordance with the DPA, your rights in relation to your own personal data include:

- a. **The right to be informed and the right of access:** The right to request access to all personal data the DFM maintains about you as well as supplementary information about why and how we are processing your personal data. This is commonly known as a Data Subject Access Request and certain supplementary information about our processing is contained within this Privacy Notice.
- b. **Rights in relation to inaccurate data:** The right to request the rectification, blocking, erasure or destruction of any inaccurate personal data the DFM maintains on you. We will ensure, through all reasonable measures, that your personal data is accurate, complete and, where necessary, up-to-date, especially if it is to be used in a decision-making process.
- c. **The right to stop or restrict Processing:** The right to restrict or stop how the DFM uses your personal data in certain circumstances.
- d. **The right to stop direct marketing:** The right to cease the use of your personal data by the DFM for direct marketing purposes. The DFM does not currently carry out any direct marketing activities. However, we will update this Privacy Notice and we will also notify you in writing as required if this position changes.
- e. **Rights in relation to automated decision making:** The right to obtain information about and object to the use of automated decision making by the DFM using your personal data. The DFM does not currently use automated means to make decisions about you. However, we will update this Privacy Notice and we will also notify you in writing as required if this position changes.
- f. **The right to complain:** The right to complain to the Ombudsman about any perceived violation of the DPA by the DFM.

- g. **The right to seek compensation:** The right to seek compensation in the Court if you suffer damage due to a contravention of the DPA by the DFM.

You may contact the DFM, using the contact details listed below in section 11 of this Privacy Notice, to access and review your personal data or to exercise any other rights provided to you under the DPA. The DFM will take into consideration circumstances where, under the DPA or other applicable legislation, your rights may be limited or subject to conditions, exemptions or exceptions.

Upon contacting the DFM, we may need to verify your identity prior to fulfilling a request and may request additional information as required. In accordance with the DPA, the DFM may also charge a reasonable fee in relation to your request if it is unfounded or excessive in nature, or the DFM may reserve the right not to comply with the request at all.

To learn more about your rights, visit www.ombudsman.ky.

10. Data Protection Principles

When processing your personal data, the DFM will comply with the eight Data Protection Principles defined within the DPA:

- a. **Fair and lawful processing:** Personal data shall be processed fairly. In addition, personal data may be processed only if certain conditions are met, for example the data controller is subject to a legal obligation that requires the processing or the processing is necessary for exercise of public functions.
- b. **Purpose limitation:** Personal data shall be obtained only for one or more specified, explicit and legitimate purposes, and not processed further in any manner incompatible with that purpose or those purposes.
- c. **Data minimisation:** Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are collected or processed.
- d. **Data accuracy:** Personal data shall be accurate and, where necessary, kept up-to-date.
- e. **Storage limitation:** Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose.
- f. **Respect for the individual's rights:** Personal data shall be processed in accordance with the rights of data subjects under the DPA, including subject access.
- g. **Security – confidentiality, integrity and availability:** Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- h. **International transfers:** Personal data shall not be transferred to a country or territory unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

11. How to Contact Us

The DFM has appointed a Data Protection Leader. If you have any questions about this Privacy Notice or how your personal data are handled, or if you wish to make a complaint, please contact:

Name: Serena Whittaker, Customer Relations & Business Services Manager

Telephone number: +1345-244-3430

Email Address: serena.whittaker@gov.ky

Address: Government Administration Building, 133 Elgin Ave, George Town, Grand Cayman

The DFM aims to resolve inquiries and complaints in a respectful and timely manner.

12. Changes to this Privacy Notice

The DFM reserves the right to update this Privacy Notice at any time and will publish a new Privacy Notice when we make any substantial updates. From time to time, the DFM may also notify you about the processing of your personal data in other ways, including by email or through our publications.

This Privacy Notice was last updated on 28 July 2025.