



# **Department of Communications**

Cayman Islands Government

## **External Privacy Notice**

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# Document Administration

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## Version Control Notice:

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# **Privacy Notice**

## **1. Scope**

The Cayman Islands Government (“CIG”) Department of Communications (the “DOC”) 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. It applies to the DOC, which publishes the official [Cayman Gazette](#) (the “Gazette”) and oversees Content & Production (video production, CIGTV, graphics), Internal Communications, Engagement and Training, Public Relations, and Strategic Communications, which includes CIG digital channels as well as insights and reporting.

This Privacy Notice does not apply to the processing of personal data for human resources management, financial management, procurement, or audits involving the operations of the DOC. This is because the DOC is part of the Cabinet Office portfolio of responsibilities and, when the Cabinet Office carries out these processing operations as a Civil Service Entity, the Cabinet Office is the data controller. Learn more about how your personal data may be used by the Cabinet Office at [gov.ky/cabinetoffice/privacy-notice](https://gov.ky/cabinetoffice/privacy-notice).

## **2. What Personal Data We Collect**

The DOC may collect your personal data directly from you or indirectly from third party sources. Personal data collected by the DOC will be limited to what is necessary for our processing activities.

In this Privacy Notice, “personal data” means any data relating to an identified or identifiable living individual. The term “personal data” also includes a category of personal data known as “sensitive personal data”, which is defined in the DPA and includes data relating to your physical or mental health or condition, medical data and criminal offence data.

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

- a. Personal data you provide through our website [GOV.KY](#). A detailed privacy notice for GOV.KY and information about how we use Cookies on the site, is available at [gov.ky/privacy-policy](https://gov.ky/privacy-policy);
- b. Any information you choose to provide when interacting with the DOC through our social media channels, i.e. on Facebook [@caymangov](#), Instagram [@caymangov](#), X [@caymangovt](#), LinkedIn [@cayman-islands-government](#), and YouTube [@caymanislandsgovernment](#);
- c. Personal data you provide when you [sign up to receive our newsletter](#).
- d. Personal data you provide when you visit the DOC premises at the Government Administration Building in Grand Cayman and other locations; contact us by email, by telephone or through our social media channels; or access our various programmes and services, including our online services;
- e. Personal data you, your supervisor or another colleague may provide for you to become part of the community of practice for public communicators, which supports public servants working in communications roles in the CIG's ministries, portfolios, departments, statutory authorities and government companies;
- f. Your name, contact details, employer/organisation and other personal data you, your supervisor or another colleague may provide for you to be added to our list of media contacts;
- g. Personal data collected through CCTV or other monitoring and security mechanisms at the Government Administration Building and other locations where we may operate, if these data were collected directly by the DOC or by any other data controller who may then lawfully disclose

the data to the DOC for a legitimate purpose (e.g. to investigate a breach of the law or a security incident);

- h. Personal data you or a third party may provide for publication in the [Gazette](#), particularly the name and contact details of individuals who are to be contacted for enquiries relating to commercial notices, and other data legally required or authorised to be published in the Gazette by the CIG or other persons, e.g. the names of individuals who have been appointed to and/or removed from the membership of statutory bodies (i.e. boards, committees, commissions, tribunals, authorities, councils and similar);
- i. Personal data provided by a member of your family, your employer, or some other person who is closely connected to you if this is relevant to that person's engagement with the DOC or our functions; and
- j. Any other personal data where the collection is necessary to achieve our lawful purpose(s).

### 3. How We Use Your Personal Data

The Government Communications Service led by the DOC is the Civil Service functional and professional body for people working in communication roles across the public sector. We hold expertise in all communications disciplines and are made up of collaborating units, each leading on various functions to produce the very best in modern-day, inclusive, informative and creative communications.

Led by the Director of Communications, the DOC supports Government priorities, enables the effective operation of public services and makes the lives of those we serve better. The role of Government Communications is to drive public trust and engagement in government priorities through audience driven campaigns, content and channels.

In delivering on our mission, the DOC may use your personal data for the following purposes:

- a. Implementing policies, providing services and programmes, and managing your relationship with us;
- b. Responding to your enquiries;
- c. Verifying your identity;
- d. Measuring how users interact with the DOC's website, GOV.KY, (including by aggregating personal data collected using cookies) and other CIG channels to continually improve how we communicate with our audiences;
- e. Communicating and interacting with website visitors and social media users;
- f. Sending you marketing communications;
- g. Communications and public relations activities, including sending you marketing communications;
- h. Media relations activities;
- i. Publishing notices in the [Gazette](#) where required or authorised by law or by the Governor in accordance with the Official Gazette Act (1997 Revision), e.g. relating to the appointment of liquidators, declaration of prohibited immigrants by the Cabinet, applicants for probate, appointment/reappointment/revocation of appointment of members of statutory bodies (i.e. boards, committees, commissions, tribunals, authorities, councils and similar) by the Cabinet, and other individuals whose personal data are included within commercial and government notices that have been submitted for publication in the Gazette;
- j. Coordinating and leading the public communicators community of practice and supporting individual public servants working in the communications profession across the public sector;

- k. Statistical and other reporting, both internally and externally;
- l. Seeking legal advice, and exercising or defending legal rights;
- m. Complying with our legal obligations, including all legislation that applies across the public sector, e.g. legislation that provides for records and information management;
- n. Ensuring other agencies are able to carry out their public functions if it is necessary for us to disclose your personal data directly to them, including to verify information you have provided;
- o. Reporting a suspected crime or other breach of the law, or assisting a law enforcement agency or other competent authority in the course of an investigation; and
- p. Disclosing and/or publishing records held by the DOC if we are required to do so under the Freedom of Information Act (2021 Revision). If we receive a Freedom of Information ("FOI") request for records that include your personal data, we will always consult with you in writing if we are considering disclosing any of your personal data and you will also have the right to appeal our final decision to the Ombudsman if you have not provided your consent for the disclosure

#### 4. How We Share Your Personal Data

The DOC may share your personal data as required, including under applicable legislation, with recipients that include joint data controllers, our data processors, and third parties. We will only share your personal data as permitted by the DPA and in accordance with other applicable laws and policies.

Your personal data may be shared with the following types of recipients:

- a. **Other public authorities:** Personal data may be shared with other CIG ministries, portfolios, offices, departments, statutory authorities, statutory bodies and government companies as required or permitted by law and for one or more of the purposes set out in this Privacy Notice. In particular, the DOC may share any submissions you may make through GOV.KY or any of our social media channels if the content you have provided relates to another public authority and requires an action or response. If we collect your personal data through cookies on our website and analytics tools, we will not share the data in a way that could identify you unless sharing the identifying information is necessary and has a legal basis, e.g. for the Royal Cayman Islands Police Service or another law enforcement agency to detect and investigate breaches of the law.
- b. **Data processors external to the CIG:** Personal data may be shared with our service providers. When acting as data processors, our service providers are only able to use personal data under our instructions. We engage Data Processors for a variety of activities, which may include:
  - i. Webhosting;
  - ii. Information Technology;
  - iii. Records and Information Management, including storage facilities;
  - iv. Communications;
  - v. Marketing and campaigns;
  - vi. Events management; and
  - vii. Security operations and fraud prevention.

In limited circumstances, service providers who act as data processors for the DOC 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 DOC processes your personal data and this use of your personal data 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. **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 audits or investigations by competent authorities; and
  - iv. Complying with information security policies or requirements.
- 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 DOC 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 DOC is subject, e.g. as the appointed Editor of the Gazette we are legally required to publish the Gazette in accordance with the Official Gazette Act (1997 Revision), and as a public agency we are required to make and maintain complete and accurate public records in accordance with the National Archive and Public Records Act (2015 Revision);
- b. To exercise **public functions**, including those of the DOC as the functional and professional body for communications across the CIG;
- c. To protect your **vital interests**;
- d. Your **consent**, e.g. to send marketing communications or to administer surveys and polls; and
- e. For the purposes of **legitimate interests** pursued by the DOC or by a third party or parties to whom the personal data may be disclosed, e.g. when broadcasting or publishing photographs and videos taken at public events on our digital channels, or when responding to FOI requests or to enquiries from law enforcement agencies and other competent authorities.

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

- a. To exercise our **public functions**;
- b. To protect your **vital interests** or those of another individual;
- c. In relation to **legal proceedings**, including obtaining legal advice and otherwise establishing, exercising or defending legal rights;
- d. If **you have taken steps to make the personal data public**; and
- e. Your **consent**.

## 6. Security and International Transfers

The DOC 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. Administrative and technical controls to restrict access to personal data on a “need to know” basis;
- d. Partnering with other government entities to maintain 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, including through actions such as patching, license renewals/expiry monitoring, system health checks and account/user access management;
- e. Contractually requiring that our Data Processors maintain appropriate security measures;
- f. Maintaining appropriate records of access to and processing of personal data;
- g. Ensuring employees are trained on security policies and measures that have been implemented;
- h. Using appropriate measures, such as encryption, pseudonymisation and chain of custody records, to protect personal data, including when stored on laptops, tablets and other storage devices;
- i. Utilising appropriate and secure methods to destroy personal data as legally required; and
- j. Taking other reasonable measures as required at any time by legislation, rules and policies.

The DOC 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.

## 7. How Long We Keep Your Personal Data

The DOC 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 data so that it is no longer associated with you.

## 8. Your Rights

The DOC 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 DOC 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 (“DSAR”) 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 DOC 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 DOC 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 DOC for direct marketing purposes.
- 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 DOC using your personal data. The DOC 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 DOC.
- 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 DOC.

You may contact the DOC, using the contact details listed below, to make a DSAR to access and review your personal data or to exercise any other rights provided to you under the DPA. The DOC 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 DOC, we may need to verify your identity prior to fulfilling a DSAR and may request additional information as required. In accordance with the DPA, the DOC may also charge a reasonable fee in relation to your DSAR if it is unfounded or excessive in nature, or the DOC may reserve the right not to comply with the request at all. To learn more about your rights, visit [www.ombudsman.ky](http://www.ombudsman.ky).

## 9. Data Protection Principles

When processing your personal data, the DOC 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.



## **10. How to Contact Us**

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

Name: Takiyah Smith

Telephone number: +1 345 244 1778

Email Address: [foi.doc@gov.ky](mailto:foi.doc@gov.ky)

Address: Government Administration Building Box 105, 133 Elgin Ave, Grand Cayman KY1-9000

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

## **11. Changes to this Privacy Notice**

The DOC 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 DOC 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 8 August 2025.*