



**GDPR Policy, Privacy Statement, Terms & Conditions**

**And**

**Cookie Use Policy**

**THE GIBRALTAR ASSOCIATION OF COMPLIANCE  
OFFICERS**

Version	Date	Author	Reason	Sections
1.0	01 January 2019	GACO Executive Committee	Establishment of the Policy	<All>
2.0	19 February 2025	GACO Executive Committee	Change of Logo	<Logo changed on coverpage>

# Data Protection Policy

## 1. Definitions

“Association” means The Gibraltar Association of Compliance Officers (GACO).

“ICO” means Information Commissioner’s Office UK

“GDPR” means the General Data Protection Regulation.

“GRA” means the Gibraltar Regulatory Authority

“Responsible Person” means the GDPR Responsible Person that will be appointed on a yearly basis by the GACO Executive Committee and that will be responsible for the Data Protection.

“Register of Systems” means a register of all systems or contexts in which personal data is processed by the Association.

## 2. Data Protection principles

The Association is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard

the rights and freedoms of individuals; and

- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### **3. General Provisions**

- a. This policy applies to all personal data processed by the Association.
- b. The Responsible Person shall take responsibility for the Association's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Association shall register with the GRA (Gibraltar Regulatory Authority) as an organisation that processes personal data.

### **4. Lawful, fair and transparent processing**

- a. To ensure its processing of data is lawful, fair and transparent, the Association shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the Association shall be dealt with in a timely manner.

### **5. Lawful Purposes**

- a. All data processed by the Association must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests (see GRA and/or ICO guidance for more information).
- b. The Association shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Association's systems.

### **6. Data Minimisation**

The Association shall ensure that personal data are adequate, relevant and limited to

what is necessary in relation to the purposes for which they are processed.

## **7. Accuracy**

- a. The Association shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

## **8. Archiving/Removal**

- a. To ensure that personal data is kept for no longer than necessary, the Association shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

## **9. Security**

- a. The Association shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## **10. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Association shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the GRA (more information on the GRA and/or ICO website).

END OF POLICY

## **Privacy Statement (for GACO's Webpage)**

Preservation of your privacy [the client's privacy] is important to The Gibraltar Association of Compliance Officers (GACO) and we are committed to letting you know how we use your personal information and to making only responsible use of your personal data.

References to "we", "us", "you" or "our" in this Privacy Policy are references to The Gibraltar Association of Compliance Officers (GACO), an association established in Gibraltar.

### **1. Information about you**

1.1 We will collect personal information from you when you or your organisation enquire about our activities, register as a member with us or subscribe to one of our courses, seminars, breakfast events or request any other services. This may include your name, title, email address, physical address, telephone and/or mobile numbers and job title. We may also ask for some additional, non-personal information if deemed necessary or appropriate.

### **2. Our use of this information**

2.1 Your personal information will only be used to process your requests, to provide you with our services, and to provide you with information relating to our services, courses, seminars, events and all other services which we think you may be interested in. We will as well from time to time provide you with sector and/or compliance relevant information that might be of your interest. Said details, particulars or facts will be provided to you or your organisation for information purposes only and will not constitute legal, fiscal, investment, accounting or any other type of advice.

2.2 We will share your information only with our training course providers, when necessary to ensure the successful completion of the seminar, event and or training course.

### **3. Security**

3.1 We will take reasonable precautions to prevent the loss, misuse or alteration of information you give us.

3.2 Communications in connection with this service may be sent by e-mail. For ease of use and compatibility, communications will not be sent in an encrypted form.

Please be aware, that e-mail is not a fully secure means of communication. Whilst we endeavour to keep our systems and communications protected against viruses and other harmful effects, we cannot bear responsibility for all communications being virus-free.

### **4. Cookies**

4.1 If cookies are used, they will only be used to assist the purposes set out in this privacy policy, but cookies will not be used if we do not consider them to be necessary. Please read our Cookies Policy on the webpage for more information.

## **5. Further information**

5.1 If you would like us to correct or update any information, or if you would like information deleted from our records or if you would like to request information concerning the personal data we hold about you, then please email us at [info@gaco.gi](mailto:info@gaco.gi).

5.2 This privacy policy may be updated from time to time, so please check it periodically.

5.3 Links within our sites to other websites are not covered by this privacy policy; before using third party pages kindly read their privacy policies.

You should read this Privacy Statement Policy together with our Cookies Policy and our Terms and Conditions. You will find the same on our Webpage: [www.gaco.gi](http://www.gaco.gi).

END OF POLICY

# **GACO's Terms & Conditions Policy**

## **Website Terms & Conditions**

This website is owned and operated by The Gibraltar Association of Compliance Officers (GACO). References to “we”, “us”, “you” or “our” in these Terms and Conditions are references to The Gibraltar Association of Compliance Officers – GACO – an Association established and domiciled in Gibraltar.

You may not alter this website in any way or post onto or transmit to this website any material containing software viruses or files which may damage or disrupt the good working order of computer or telecommunications equipment.

## **1. Copyrights**

1.1 The materials contained on this site are either the copyright of individual contributors or of GACO and may be subject to other intellectual property rights.

1.2 GACO might publish from time to time third party articles on its webpage for information purposes only and the copyrights and other intellectual property rights of those articles may be subject to other property rights of the authors of the information published.

## **2. Use of this website**

2.1 The following acts are prohibited in respect of this website and any of the content featured on it:

- Any rental leasing or lending of any material obtained or derived from the website;
- Reproduction, including without limitation the extraction and/or storage in any retrieval system or inclusion in any other computer program or work, without the prior consent of The Gibraltar Association of Compliance Officers – GACO. If you wish to reproduce any content, you must contact us and we may charge a fee. Please contact [info@gaco.gi](mailto:info@gaco.gi) who will be able to advise accordingly.
- Altering, transforming or building upon any content contained in this website.
- All copyrights and trade mark notices, marks, disclaimers and other such elements must be preserved and upheld at all times.

2.2 For the avoidance of any doubt: GACO does not provide tax, investment, legal, audit, accounting or any other type of advice. Any material prepared by GACO and sent to members by email, provided via GACO training courses, seminars and/or other types of events and/or published on the webpage is prepared and disseminated for informational purposes only, and is not intended to provide, and should not be relied on for, tax, investment, legal, audit, accounting or any other type of advice. GACO will always advise that anyone receiving information from the Association, consult their own tax, legal, audit, investment, accounting



or other professional advisors as deemed appropriate before engaging in any transaction or taking any decision. GACO and its Executive Members and Administrators will not assume any responsibility or liability for any possible claim for damages arising from any decision that members or other parties make based on information or other content made available to them through GACO's webpage, via GACO training courses, seminars and/or other types of events, published on the webpage, circulated/sent by e-mail or any other means of communication.

### **3. Links to third party sites**

3.1 This website may contain links to websites operated by third parties. The operation of these websites is outside The Gibraltar Association of Compliance Officer's control and you proceed at your own risk. We do not endorse or sponsor, and are not liable for the products, services or content you access through any linked site.

### **4. Data protection**

4.1 We will collect, use, store and disclose your personal details in accordance with our Privacy Policy.

### **5. General**

5.1 If any part of these terms and conditions are not enforceable, this will not affect the enforceability of any other part.

5.2 These terms and conditions are governed by Gibraltar Law and all disputes will be submitted to the nonexclusive jurisdiction of the Gibraltar Courts.

PLEASE READ THE TERMS AND CONDITIONS IN CONJUNCTION WITH OUR WEBSITE'S COOKIES USE POLICY AND PRIVACY POLICY.

END OF POLICY

# Cookies Use Policy

## Cookies Use Policy

### 1. What are cookies

- A cookie is a small piece of data or message that is sent from a website's server to your web browser and is then stored on your hard drive. They are generally used to improve your user experience by – for example – remembering what is in your online shopping basket or keeping you logged in on a website as you navigate from one page to another. Cookies cannot read data off your hard drive or other cookie files, and do not damage your system.

### 2. How we use cookies

#### 2.1 First party cookies

- The only first party cookies we use allow Google Analytics to monitor the performance of our website. Soon we will use cookies to store login information and remember preferences so you may want to check what these cookies are when this happens.
- A description of first party cookies is provided under the following link: <https://www.pcmag.com/encyclopedia/term/43229/first-party-cookie>.

#### 2.2 Third party cookies

- We only use essential third party cookies to process – for example – your membership registration or process a payment you have made. Without them you would simply lose information from one page to the next.
- We also use social media (e.g. Twitter, Facebook, YouTube) and their buttons to connect with/to their websites, so read their cookie use policy to check what information they're collecting on you too.
- A description of third party cookies is provided under the following link: <https://cookie-script.com/all-you-need-to-know-about-third-party-cookies.html>

### 3. How to change your cookies

#### 3.1 First party

- Your web browser settings allow you to refuse any cookie or to alert you to when a cookie is being sent. They also allow you to control cookies stored on your hard drive.

#### 3.2 Third party

- The above applies but as mentioned before the only third-party cookies we use are essential to complete certain tasks, therefore if you disable them, the thing you are trying to do will work. If this happens, please contact us over: [info@gaco.gi](mailto:info@gaco.gi).

PLEASE READ THIS COOKIE USE POLICY IN CONJUNCTION WITH OUR WEBSITE'S TERMS AND CONDITIONS AND OUR PRIVACY POLICY.

END OF POLICY