



Policy Notice on how BFG uses personal data

1. British Forces Germany is part of the Ministry of Defence. This privacy policy explains how we process the personal data we collect and hold about you.

What data do we collect about you?

2. We collect, store, and process various categories of personal information about you which has either
 - been provided by you,
 - Obtained through 3rd party security and vetting procedures,
 - held in your employment or service record,
 - recorded by CCTV or other photographic methods as sound or visual images (for example, photographs for ID cards and passes).
3. Data collected about you may also include personal data with regard to your family.
4. Some of the data we process about you is "special categories" of more sensitive personal information, such as:
 - Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
 - Trade union membership.
 - Information about your health, including any medical condition, health and sickness records. This may also include the health records of other family members.
 - Genetic information and biometric data.
 - Information about criminal convictions/allegations and offences.
 - Physical identifiers including DNA, fingerprints and other genetic samples.

The purposes for collecting and processing your personal data

5. We collect and use your personal data for various purposes.
 - To comply with legal and regulatory requirements under both UK and German law, such as in regard to health and safety, law enforcement, crime prevention and the maintenance of law and order. This may also include dealing with legal disputes involving you, or other colleagues, including accidents at work;

- For business management and planning, including accounting and auditing, and to ensure compliance with our personnel, IT and security policies. This may include monitoring your business and personal use of our information and communication systems;
 - To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution;
 - To provide you with various services such as accommodation, healthcare, education (for you and your family), vehicle registration, privileges under the NATO SOFA and Supplementary Agreement, community support services and social work services.
 - For the purpose of administering and safeguarding security and intelligence matters.
6. We may also use your anonymised data for purposes such as data analytics studies to review and better understand employee retention and attrition rates, Equal opportunities monitoring and other research or statistical purposes.
7. Some of the purposes will overlap and there may be several grounds which justify our use of your personal information on a single or multiple occasion.

The legal basis for the processing your personal data

8. We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in one or more of the following circumstances:
- Where it is in the public interest to do so; or for official purposes; or in the exercise of a function of the Crown, a Minister of the Crown or as a government department.
 - Where it is necessary for the purposes of the legitimate interests of a third party or MOD, where such processing is not necessary in pursuit of our public tasks, unless those interests are overridden by your rights.
 - Where we need to comply with a legal obligation including those that relate to our specific arrangements with Germany in regard to BFG.
 - Where it is necessary for performing a contract we have entered into with you.
 - Where we have your informed consent.
 - Where it is necessary in order to protect your vital interests of those of another individual.

With whom we will be sharing your personal data

9. We will in some circumstances have to share your data with other parts of MOD and third parties, including third-party service providers in both the UK and Germany and other Civil Service and Government bodies.
10. This may be necessary as required by law, where it is necessary to administer the working relationship with you; where it is in the public interest to do so or where it is necessary for the performance of our functions as a Government Department or a function of the Crown. This will, in some circumstances, involve sharing special categories of personal data and, where relevant, data about criminal convictions/allegations.
11. Sharing your personal information may also be necessary as part of our regular reporting activities on departmental performance, succession planning, statistical analysis and general management, safeguarding defence purposes and national security.
12. Where we do share your personal data we require third parties to respect the security of your data and to treat it in accordance with the law. We will in some circumstances transfer your

personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

How long do we keep your personal data?

13. We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
14. To determine the appropriate retention period for personal data, we consider the category and nature of the personal information, the amount of data, its sensitivity, the potential risk of harm from unauthorised use or disclosure, the purposes for which we process the personal data and whether we can achieve those purposes through other means.
15. After the reasonable and necessary retention period, has elapsed all data will be destroyed securely in line with MOD data destruction policy.
16. In some circumstances, we will anonymise your personal information so that it can no longer be associated with you, in which case we will use such information without further notice to you.

Other matters

17. If you do not provide the data referred to above when requested to do so, it may prove impossible for us to fulfil the necessary purpose. This may mean we are unable to meet our obligations to you, and those arising under our Crown functions and as a Government Department. This could lead to significant risk to you and others as well as (in some cases) a risk to national security.
18. If you are unable or refuse to provide information as requested please contact the person requesting the data for specific information on what this means for you in terms of service, employment, vetting, allowances etc.
19. We do/do not use the data you have provided for automatic decision making.

Your rights

20. Unless an exemption applies, you have the [following rights](#):
 - a. right to request a copy of the personal data we hold about you,
 - b. the right to have any inaccuracies in your information corrected;
 - c. In certain circumstances you may have the right to have the personal data we hold on you erased; and
 - d. In certain circumstances you may have the right to restrict processing of the personal data we hold on you.

Contacting us

21. If you want more information on any of the rights listed in paragraph 22, if you are unhappy with how any aspect of this privacy notice, how your personal information is being processed, or if you have any complaints, please contact the BFG Data Protection Officer:

Warrant Officer Class One (Staff Sergeant Major) A G Moss
Data Protection Officer
HQ BFG
Catterick Barracks
BFPO 140

Email: BFG-HQ-iHub-IMWO@mod.gov.uk

22. The contact details of Ministry of Defence (MOD) Data Controller and Data Protection Officer (Mr Martin Elliot) are:

MOD Data Protection Officer
Ground floor, zone D
Main Building
Whitehall
London
SW1A 2HB

Email address: cio-dpa@mod.gov.uk

23. **We will acknowledge your complaint within 5 working days and send you a full response within 20 working days. If we can't respond fully in this time, we will write and let you know why and tell you when you should get a full response.**
24. **If you are not satisfied with our response, you have the right to lodge a complaint with the Information Commissioner's Office, whose contact details are as follows:**

The Information Commissioner
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745

<https://ico.org.uk/global/contact-us/>

Email: casework@ico.org.uk

Changes to this privacy notice

25. We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We will also notify you in other ways from time to time about the processing of your personal information.