



## Freedom of Information – Privacy Notice

Dated August 2023 (Version 1.1)

### Isle of Man Freedom of Information Act 2015 (“FOIA”)

The Freedom of Information Act 2015 (FOIA) gives Isle of Man residents a legally enforceable right to obtain access to information held by a public authority. This is subject to certain exemptions and practical refusal reasons.

You can find out more information on the FOIA including how to make a request to us here: [Isle of Man Government – Freedom of Information](#) and you can also use this link to view previous requests and their responses.

We are the controller for the personal data you provide to us when making a FOI request to Manx National Heritage.

### Legal basis for processing your information

We need your personal information (such as your name and contact details) to process and respond to you about your Freedom of Information request. In some cases, we may ask for proof of identification, and proof of residency, so that we can comply with the FOIA.

We must have a legal basis (a lawful reason) to process your personal data, which is submitted by you when you make a Freedom of Information request. The legal basis for processing your information when you make a request is that it is necessary for us to comply with the law (FOIA), or that it is necessary for us to perform a public task in the public interest. This is set out in Articles 6(1)(c) and (e) of the Schedule to the Data Protection (Application of GDPR) Order 2018 – this legislation is sometimes called “the Applied GDPR”).

### Sharing information

FOI requests have to be submitted on a form prescribed by the Chief Executive Officer (Isle of Man Government) in order to be valid and accepted under the FOIA. You can either submit a request using the form online or a paper version, which is available by contacting our Data Protection Officer (see below for contact details).

When we process FOI requests made using the Online Services Portal on the Isle of Man Government website, a system called iCasework is used to process your request. The iCasework system is provided by a company called Civica UK Limited. This system stores information such as:





- Your name;
- Your address;
- Your telephone number and email address;
- Your company name, if you are requesting information on behalf of an organisation;
- Your request – we do not recommend putting any personal information into your request; if you are not sure what to include in your request, please contact us on [mnhicaseworkfoi@mnh.im](mailto:mnhicaseworkfoi@mnh.im) for assistance;
- If requested, proof of residency from you.

Civica UK Limited act as a processor on behalf of all the public authorities. Civica UK Limited use the information held in the iCasework system for the purpose of providing a system to manage freedom of information requests and to transfer this information to the relevant public authority. The information you provide to Civica UK Limited will be kept secure and confidential.

Access to your information is limited to authorised staff members within Manx National Heritage (MNH). The Department of Home Affairs (DHA), through the Office of Cyber Security & Information Assurance (OCSIA), has been contracted by the public authorities, including MNH, to manage system administration on our behalf. The DHA through OCSIA will only access personal data held on the iCasework system when explicit written instructions are provided by the relevant public authority – in our case, by authorised MNH staff members.

## **If you are unhappy with the response to your Freedom of Information request**

If you have been unhappy with a response we have provided you may complain about your request to the Information Commissioner's Office: <https://www.inforights.im/complaint-handling/how-to-make-a-complaint-to-the-information-commissioner/>. In this case we will need to share information such as emails we have sent or received from you with the Information Commissioner's Office, so that they can investigate the complaint.

## **Storing your information**

Your personal information will be held in iCasework for 12 months after MNH has closed your request; or if you requested a review of your request, your personal information will be held in iCasework for 36 months after MNH has closed your request. After this time, the request will remain on the iCasework system, but all your personal information you provided at the time of the request will be deleted.

## **Your rights**

The Applied GDPR (data protection legislation) provides you as a data subject with some rights to be informed of the processing of your personal data, including the right to access that data and information about the purposes for processing.



This includes a right to correct (rectify) any information a public authority holds, or to restrict it in certain circumstances.

As Manx National Heritage is processing your data in order to comply with our legal obligations, certain elements of the data protection rights do not apply, including the right to have your data deleted (erasure), transferred to another provider, the right to object to the processing, and be informed about automated decision making.

When using the iCasework site or dealing with FOI requests, we do not make any automated decisions or profile your data.

## **Data Protection Officer**

If you have any questions about how we process your personal information, you can speak to our Data Protection Officer regarding your rights.

Email: [DPO@mnh.im](mailto:DPO@mnh.im)

Phone: +44 (0)1624 648000

In writing to:

Data Protection Officer  
Manx National Heritage  
Manx Museum  
Kingswood Grove  
Douglas  
Isle of Man  
IM1 3LY

Details of rights under the data protection legislation can be found in our general privacy notice at: <https://manxnationalheritage.im/cookies-privacy/>

If you have submitted a request to another public authority, you should review the privacy information for that public authority; details are [here](#).

## **Additional information**

[Isle of Man Government Freedom of Information](#)

[Freedom of Information Act 2015 – legislation](#)

[Information Commissioner’s Office – Freedom of Information guidance page](#)