



Cayman Islands Government
Lands and Survey Department External Privacy Notice
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L&S APPROVAL:	 Uche Obi, Director
CHIEF OFFICERS'S APPROVAL:	
EFFECTIVE DATE:	

Privacy Notice

1. Scope

The Cayman Islands Government Lands and Survey Department (the “Department”) respect 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. This Privacy Notice applies to the Department, including the Land Registry Section, Survey Section, National Geographic Information Systems Teams, and Valuation and Estates Office.

This Privacy Notice does not apply to the Department when we are processing personal data relating to our employees, who are covered under our Employee Privacy Notice. This Privacy Notice does not apply to the Land Surveyors Board or its committee members

The Land Surveyors Board operates as a separate entity and will maintain its own privacy notice. At this time, their privacy notice is not yet available and will be provided once finalized.

2. What Personal Data We Collect

The Department collects personal data, including sensitive personal data, directly from you and may also collect your personal data indirectly from third party sources. Personal data collected by the Department is limited to what is necessary for our processing activities. In this Privacy Notice, personal data includes any data relating to an identified or identifiable living individual and includes: name, email address, physical address, mailing address, phone number.

Personal data we collect directly from you

The Department may collect the following information directly from you:

- a. Personal data you provide through the Department website(s), [www.caymanlandinfo.ky/](http://www.caymanlandinfo.ky/www.lands.gov.ky) www.lands.gov.ky, such as:
 - i. Personal data provided within comments and questions, including your name and/or email address if you provide these details in our web form. If you ask questions about our public services and programmes or provide information about your relationship with us, this may also reveal other personal data, e.g. your employment status, health information, or property ownership;
 - ii. Your Internet Protocol (“IP”) address, details of which device or version of web browser you used to access our website content, and other information about how you used our website (*see our Cookie Notice for more information* <https://www.caymanlandinfo.ky/Privacy>) ;
- b. Personal data you provide when you visit the Department offices and other locations; contact us by email, post, by telephone or through our social media channels; or when you create an account with us to access our programmes and services, including our online services, Document Request www.lands.gov.ky , Map request <https://www.caymanlandinfo.ky/Services/NGIS/MapReques> or Caymap_ www.caymanlandinfo.ky/register ;
- c. Personal data that you provide when you inquire about a job with the Department;
- d. Any information you choose to provide when interacting with the Department on social media platforms, including, [X](#) (formerly Twitter) @lands_surveyCI; [Facebook](#) @landsandsurveyci and [Instagram](#) @landsandsurveyci; and [LinkedIn](#) Department of Lands & Survey

- e. Any other personal data where the collection is necessary to achieve our lawful purpose(s).

Personal data collected from other sources

The Department may collect the following personal data from other sources:

- a. Attorneys-at-law, chargees, real estate agents, Licensed Land Surveyors or Valuation Surveyors;

The personal data is usually collected when you:

- i. Make applications or apply for our services through a third party;
- b. Third parties that file complaints or objections;
- c. 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 Department may use your personal data for the following purposes:

- a. Implementing policies, providing services and programmes, and managing your relationship with us;
- b. Maintaining the Land Register, Registry Map, Register of Powers of Attorney, Index of Owners, Strata Plan Registry, and other required records;
- c. Providing information supply services, including access to data maintained on or derived from the Registers, as well as information managed by the Department. This may involve combining Register data with other sources, such as department-managed records, publicly available data, or sales data, in connection with its products and services
- d. Processing payments;
- e. Validating and authenticating records;
- f. Issuing legal notices for various land related matters;
- g. Responding to your inquiries;
- h. Verifying your identity;

For certain applications, in order to verify that we are dealing with the person authorized to make such an application, or that you fall into the categories prescribed by law, we may request proof of identity.

Proof of identity provided by you may be kept indefinitely by us as evidence of identity checks when dealing with your application for registration or other services. We may hold your personal data in either electronic or hard copy form. Identity evidence is not publicly available under the Registered Land Act; but, this information may be shared with law enforcement. Otherwise, the Department takes reasonable steps to protect evidence of identity from loss, misuse or unauthorized disclosure.

- i. Measuring how users interact with the Department's website and continually improving our communications channels (including by aggregating personal data collected using cookies);
- j. Communicating and interacting with website visitors;
- k. Sending you marketing communications;
- l. Communications and public relations activities;

- m. Managing accounts payable and receivable, preventing fraud, and protecting public funds;
- n. Statistical and other reporting, both internally and externally;
- o. Seeking legal advice, and exercising or defending legal rights;
- p. Complying with our legal obligations, including all legislation that applies across the public sector, e.g. legislation that provides for records and information management, procurement, human resource management, financial management, audit, and similar functions and activities; and
- q. Communicating and interacting with job applicants and related third parties (e.g. references) and carrying out recruitment and selection processes.

4. How We Share Your Personal Data

The Department 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.

Your personal data may be shared with the following recipients that 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. For example, we may share data with the Ministry of Finance for the purpose of processing stamp duty waivers and verifying property ownership in accordance with applicable laws and regulations. Additionally, data may be shared with the General Registry to verify whether a company holding property is still listed on the Companies Register, ensuring compliance with legal and regulatory requirements.
- b. **With data processors external to the CIG:** Personal data may be shared with persons providing services to the Lands & Survey 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. 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.
- 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, for example, when required to assist law enforcement in preventing fraud and detecting property fraud or addressing suspected serious misconduct;
 - 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. This may include disclosing your personal data for the following purposes:
- i. The Registered Land Act, section 35, provides that the parcel register is open to the public and may be searched and inspected by any person, upon the payment of a fee. Searches may be made based on individual registers or instruments (by their specific number) or by name. Consequently, an owner's mailing address information is accessible through a search. Upon payment of the fee, any person can apply for official copies of the register, plans, and registration documents held by the Department. This information is accessible under the Registered Land Act and is therefore not available under the Freedom of Information Act.

5. Our Legal Bases for Processing Your Personal Data

Depending on applicable laws and other circumstances, the Department 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 Department is subject e.g. per section 35(2) of the Registered Land Act, "Any person, on application in the prescribed form and on payment of the prescribed fee, shall be entitled to a certified copy of any register or part of the Registry Map or any instrument or plan filed in the registry." and to comply with various obligations under the Procurement Act (2023 Revision) and Procurement Regulations (2022 Revision), the Public Management and Finance Act (2020 Revision) and Financial Regulations (2022 Revision), the Public Service Management Act (2018 Revision) and Personnel Regulations (2022 Revision).
- b. To exercise **public functions** including to maintain the Land Register, Registry Map, Registry of Powers of Attorney, document registration, authenticate land surveys, and issue legal notices for various land related matters.
- c. To perform and enter into a **contract** with you, example, license agreements and subscription services, and maintenance services.
- d. **Consent**, e.g. to send you marketing communications or to administer surveys and polls; and
- e. For the purposes of **legitimate interests** pursued by the Department or by a third party or parties to whom the personal data may be disclosed, e.g. when disclosing records containing third party personal data in response to a request submitted under the Freedom of Information Act (2021 Revision)

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.

6. Children's Personal Data

The Department collects personal data relating to children under the age of 18 to enable us to deliver public services and programmes and 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. Under Section 110 of the Registered Land Act, minors may hold property, and as such, we may process personal data related to children. This data, often provided via birth certificates or guardianship documents, is collected solely for statutory purposes such as:

- a. Registering property ownership.
- b. Verifying guardianship or trusteeship.

We implement additional safeguards to protect children's data, including restricted access and enhanced security protocols. Guardians may request access or correction of such data, where permissible under the law.

7. Security and International Transfers

The Department 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. Key card access to secured rooms
- b. Locking devices on secured vaults and cabinets
- c. Redacting personal data when necessary
- d. Storing personal data in sealed envelope
- e. Robust network security
- f. Backup and recovery servers domiciled in the Cayman Islands
- g. Electronic storage in the Cayman Islands
- h. Staff data protection and security awareness training

Given the nature of the public registries we manage and the services that we offer, we may disclose personal data outside of the Cayman Islands, where persons or entities who undertake searches of, or request information from, the public registry are located outside of the Cayman Islands. Examples include responding to inquiries from international regulatory bodies or legal authorities.

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 Department 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. Cookies

Cookies, in combination with pixels, local storage objects, and similar devices (collectively, "Cookies" unless otherwise noted), are used to distinguish between visitors to a website.

When you visit www.caymanlandinfo.ky, our website, small files known as Cookies may be stored on your computer, phone, tablet or any other device through your web browser. Information is stored in these text files.

We do not use cookies to:

- a. Collect or store any information that could be used to identify the user
- b. Make any attempt to find out the identity of the user
- c. Associate any data gathered with any personally identifying information from any other source.

Enabling Cookies may allow for a more tailored browsing experience and is required for certain website functionality.

Please see the website's Cookie Notice for more information about the use of Cookies.

<https://www.caymanlandinfo.ky/Privacy>

10. Your Rights

The Department 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 Lands & Survey Department 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 Department 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. However, where you identify that the personal information we hold is inaccurate, out-of-date or incomplete as it relates to the parcel register, there is a statutory provision for making those changes (by completing a form) and an associated fee for making the amendment.
- c. **The right to stop or restrict Processing:** The right to restrict or stop how the Department uses your personal data in certain circumstances. However, this cannot interfere with the statutory authority of the Department, for example, where the data is included in the public register as we are legally required to maintain this and make it available to the public under the Registered Land Act.
- d. **The right to stop direct marketing:** The Department 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 Lands & Survey Department using your personal data. The Department 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 Department.
- 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 Department.

You may contact the Department using the contact details listed below, to access and review your personal data or to exercise any other rights provided to you under the DPA. The Department 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 Department, 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 Department may also charge a reasonable fee in relation to your request if it is unfounded or excessive in nature, or the Department may reserve the right not to comply with the request at all.

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

11. Data Protection Principles

When processing your personal data, the Lands & Survey Department 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.

12. How to Contact Us

The Lands & Survey Department 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 complaint, please contact:

Name: Sophia Williams, Information Manager

Telephone number: 345-244-3663

Email Address: foi.lsu@gov.ky

Address: 133 Elgin Avenue, Government Administration Building Box 120 Grand Cayman KY1-9000

The Lands & Survey Department aims to resolve inquiries and complaints in a respectful and timely manner.

13. Changes to this Privacy Notice

The Lands & Survey Department 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 Lands & Survey Department 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 1 July 2025