



# Jersey Bank Depositors Compensation Board

## Single Customer View Project Update – December 2021

### SCV Files Transfer Mechanism

The Board would like to thank all scheme member banks which have confirmed that they are able to provide an SCV file in line with JDCS SCV Specification v2.2.

The Board is now in a position to outline the method of Secure File Transfer Protocol that it would like banks to utilise for the transfer of SCV files and reports from now onwards.

The Board has reached agreement to use the Deloitte Sharefile service as the primary method of data transfer. The protocols to be followed are outlined in the attached information sheet. If banks have observations/questions about the methodology, could they please email [info@jdcs.je](mailto:info@jdcs.je) in the first instance.

The approach adopted by the Board is designed to be as simple as possible from a technical perspective while providing the required security. Hopefully, the information contained herein and attached document will provide sufficient guidance at this juncture for banks to be able to finalise their internal documentation for SCV file transfer. It is not expected that any technical development will be required for member banks to use the Sharefile platform, and banks will be guided through the transfer process setup and any service whitelisting required upon the initiation of their first file transfer request.

It has taken longer than originally anticipated to reach this point and the Board apologises for any difficulty this may have caused for banks meeting the scheduled dates for the project.

### Data Protection

Banks should be reassured that any data transferred shall be used solely for the agreed purposes. These will be restricted to testing a SCV file or uploading to the JDCS claims management system in the event of an insolvency or a dummy test run of an insolvency. As stated above, this shall also be the method of transfer to be utilised for SCV Reports, should they be requested.

Prior to any data transfer, the JDCS and the bank concerned will agree the specifics of the purpose. As can be seen from the attached file, all data provided through the Sharefile platform will only be held until the completion of the task for which it has been requested. After this a secure deletion process will be followed.

Further, the Board can confirm that any personal data will be processed in line with the obligations placed upon it by relevant Data Protection Legislation, namely the EU General Data Protection Regulation 2016/679 and the Data Protection (Jersey) Law 2018; together with all other applicable legislation relating to privacy or data protection including any statute or statutory provision which amends, extends, consolidates or replaces the same.

In addition, the Board specifically has a compliance obligation under the Banking Business (Depositors Compensation) (Amendment No. 2) (Jersey) Regulations 2020. Under regulation 7, paragraph 10, the Board must – (a) as soon as is practicable after obtaining the information, encrypt it if it is not already encrypted; and (b) ensure that it is encrypted at all times at which it – (i) is held by or on behalf of the Board, and (ii) is not in use for a purpose that requires it to be temporarily decrypted.

Paragraph 11 dictates that for the purposes of the Data Protection (Jersey) Law 2018 and the Data Protection Authority (Jersey) Law 2018, a contravention of paragraph (10) is to be treated as also being a contravention of Articles 8(1) and 21(1) of the Data Protection (Jersey) Law 2018.

Paragraphs (10) and (11) are in addition to, and are not to be read as derogating from, any duty imposed on the Board by or under the Data Protection (Jersey) Law 2018.

### **SCV File Transfer Testing**

At this time, no bank is being requested to test a data transfer into the Deloitte Sharefile system. The Board plans to test the system early in 2022 by asking a volunteer bank(s) to provide a test file(s) using dummy data that does not contain any real or live customer data.

Later in 2022, once the Board is satisfied that exhaustive testing has proved that the data security procedures are effective, then it will seek to transfer a live bank SCV file. The purpose will be to test the quality of the data contained in that file and produce a report with results that indicate how it compares with the requirements of the specification.

The intention is to share those results with the bank concerned to assist with ensuring the required data quality standards can be met. The ongoing plan will be to test two bank SCV files per year and produce reports analysing the data quality.

Paul Leary

Chairman  
Jersey Bank Depositors Compensation Board