

PRIVACY POLICY

IN A NUTSHELL

We process your name, address and telephone numbers (and sometimes your email address) to produce invoices, arrange delivery/collection, claim gift aid and to meet our obligations to HMRC for accounting and tax purposes.

- We do not pass on your information to ANY third parties, nor have we, nor will we unless there is a legal requirement to do so (such as the police turning up with a warrant) or you give us direct consent.
- We will not contact you for the purposes of marketing or any similar activity without your direct consent. Again, we have not done it in the past, but may in the future, but only if you give written consent.
- If you want to know what data we have on our systems about you, just ask. Our CEO, Peter or Kush our Operations Manager will be happy to help.
- If we have data stored on the system that is wrong (e.g spelling mistakes) just let us know and we will correct it.
- If you want us to delete the information we hold about you, so long as we can legally do so, we will.

Peter Everett, CEO

FULL DATA PROTECTION POLICY

Policy

The Company will at all times respect the confidentiality of any records relating to members of staff and all third parties and is committed to processing data in accordance with its responsibilities under the GDPR.

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

- Processed lawfully, fairly and in a transparent manner in relation to individuals
- 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 or statistical purposes shall not be considered to be incompatible with the initial purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- 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
- 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, 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
- 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

General Provisions

This policy applies to all personal data processed by the Charity.

The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy

The responsible person shall be the company's designated person

The charity shall register with the Information Commissioner's Office as an organisation that processes personal data.

We manage our records by:-

- Keeping records secure - e.g. by locking paper records in a filing cabinet and using passwords to protect computerised ones
- Ensuring only appropriate, authorised staff with the necessary training have access to employment records
- Not giving a reference about a current or ex staff member without first checking that they are happy for us to do so
- Ensuring records are disposed of securely - e.g. by shredding manually or electronically

- Using anonymisation techniques

Lawful, fair and transparent processing

To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.

The Register of Systems shall be reviewed at least annually.

Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner (requests about the data stored about individuals, should be made in writing to the Responsible Person by the individual).

Data minimisation

The Charity shall ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Anonymisation of data will be used to ensure the charity keeps traceable personal data to a minimum (see Anonymisation, ICO code of practice)

Accuracy

The Charity shall take reasonable steps to ensure personal data is accurate.

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.

Archiving, removal and anonymisation

To ensure that personal data is kept for no longer than necessary, the Charity shall put in place archiving/removal/anonymisation processes for each area in which personal data is processed and review these processes annually.

The archiving/removal/anonymisation processes shall consider what data should/must be retained, for how long, and why; this will be recorded in the charity's Register of Systems

Security

The Charity shall ensure that personal data is stored securely using modern security software that is kept-up-to-date

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.

When personal data is deleted this should be done safely such that the data is irrecoverable.

Appropriate back-up and disaster recovery solutions shall be in place.

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 Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO

Any member of staff who inappropriately passes on confidential information may be subject to disciplinary action.

The use of CCTV

We use CCTV for security purposes both inside and outside our buildings. We advise people we are doing it by displaying signs, which are clearly visible and readable.

We make sure the system is only used for the purpose it was intended for, and limit who can see the recordings