

# DATA PRIVACY POLICY

Policy nr 08  
of



## Policy

This Privacy of Personal Data Policy [Policy number 8] refers to the Trust's commitment to treat the personal data that we hold of Beneficiaries, Trustees, employees, volunteers, consultants, prospective employees and consultants, stakeholders, suppliers and other interested parties with the utmost care and appropriate confidentiality.

With this policy we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights.

This policy incorporates the requirements of General Data Protection Regulation (GDPR) which became effective from 25 May 2018. This policy is subject to amendment to take account of changes in legislation and regulation in the future.

### Scope

This policy refers to all parties who provide any amount of personal data to us.

### Who is covered under this Policy?

Every stakeholder mentioned above must follow this policy. Entities and persons partnering with us and any other external entities working with or for us are equally obliged to observe its requirements. Generally, the policy refers to anyone we collaborate with or acts on our behalf and who may need occasional access to personal data. Examples are the Trust's solicitor and the Trust's Auditor.

### Policy elements

As part of our operations we need to obtain and process data. This may include any offline or online data that makes a person identifiable such as names, addresses, usernames and passwords, digital footprints, photographs, social security numbers, passport numbers, financial data.

The Trust collects data in a transparent way, with the co-operation and knowledge of interested parties. Once personal information is available to us these rules apply:

### **Our data will be:**

- **Accurate and kept up-to-date as far as is practicable**
- **Collected fairly and used for lawful purposes only**
- **Processed by the Trust within its legal and moral boundaries**
- **Protected against unauthorised or illegal access by internal or external parties**

### **Our data will not be:**

- **Stored for more than an amount of time specified by its data owner**
- **Transferred to organisations, states or countries known by us to lack adequate data protection policies**
- **Distributed to any party other than the ones agreed upon by the data owner (exempting legitimate requests from law enforcement authorities)**

**In addition to ways of handling the data the Trust has direct obligations towards people to whom the data belongs. Specifically we must:**

- **Let people know periodically which of their data is collected and processed**
- **Inform people about how we'll process their data**
- **Inform people about who has access to their data**
- **Have planned actions in cases of lost, corrupted or compromised data**
- **Allow people for a fee of £15 to view their data and request that we modify, erase, reduce or correct data contained in our databases**

### **Actions**

**To exercise data protection we are committed to:-**

- **Restrict and monitor access to sensitive data**
- **Develop transparent data collection procedures**
- **Train those self-employed contractors, consultants, employees and volunteers whom we engage in online privacy and security measures**
- **Build secure networks in an endeavour to protect online data from cyber attacks**
- **Establish clear procedures for reporting privacy breaches or data misuse**
- **Include contract clauses or communicate statements on how we handle data**
- **Establish data protection practices (document shredding, secure locks, data encryption, backups, access authorisation etc.)**

**This policy or an extract of it will appear on our website.**

### **Disciplinary Consequences**

**All principles described in this Policy must be strictly followed. A breach of data protection guidelines will invoke disciplinary and possibly legal action.**

**March 2021 [end]**