

# Data Protection and Privacy Policy

Friends of Davenies

Registered charity number 1167552



## Definitions

<b>Charity</b>	means Friends of Davenies, a registered charity
<b>GDPR</b>	means the General Data Protection Regulation
<b>Responsible Person</b>	means Mrs Cindy Harper
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the Charity, including a data retention schedule

### 1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

### 2. General provisions

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.

### 3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access, alter, remove or correct their personal data and any such requests made to the charity shall be dealt with in a timely manner.

### 4. Lawful purposes

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests. The charity shall note the appropriate lawful basis in the Register of Systems.
- b. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- c. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

### 5. Data minimisation

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

## **6. Accuracy**

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. 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.
- c. Individuals have the right to make a subject access request to gain access to personal information that the Charity holds about them. Such requests must be submitted in writing, either by letter to Friends of Davenies, Davenies School, 73 Station Road, Beaconsfield, Buckinghamshire HP9 2QJ or by email to the Responsible Person at [cindyharpermarlow@hotmail.com](mailto:cindyharpermarlow@hotmail.com).

## **7. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

## **8. Security**

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. 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.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## **9. 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

## **10. Contact**

If you have any questions please contact the Responsible Person at [cindyharpermarlow@hotmail.com](mailto:cindyharpermarlow@hotmail.com) or Friends of Davenies at Davenies School, 73 Station Road, Beaconsfield, Buckinghamshire HP9 2QJ.