



## **GDPR POLICY**

### **ULGHAM COMMUNITY BENEFIT SOCIETY LIMITED (“THE SOCIETY”)**

#### **1 Introduction**

- 1.1** Purpose: This GDPR policy outlines the principles, procedures, and responsibilities that The Society follows to ensure compliance with the General Data Protection Regulation (GDPR)
- 1.2** Scope: This policy applies to all Management Committee members, volunteers, contractors, and third parties who process personal data on behalf of The Society

#### **2 Data Protection Principles**

- 2.1** Lawfulness, Fairness, and Transparency: The Society will process personal data lawfully, fairly, and in a transparent manner. Data subjects will be informed of the processing activities involving their data
- 2.2** Purpose Limitation: Personal data will only be collected for specified, explicit, and legitimate purposes and will not be processed in a manner incompatible with those purposes
- 2.3** Data Minimization: The Society will only collect and process personal data that is necessary for the intended purpose
- 2.4** Accuracy: The Society will take reasonable steps to ensure that personal data is accurate and kept up to date
- 2.5** Storage Limitation: Personal data will be stored for no longer than is necessary for the purposes for which it is processed
- 2.6** Integrity and Confidentiality: The Society will implement appropriate security measures to protect personal data against unauthorized or unlawful processing, accidental loss, destruction, or damage
- 2.7** Accountability and Compliance: The Society will be accountable for and demonstrate compliance with GDPR principles



### **3 Data Subjects' Rights**

**3.1** Data subjects have the following rights under GDPR:

- Right to access
- Right to rectification
- Right to erasure
- Right to restrict processing
- Right to data portability
- Right to object

**3.2** The Society will respond to data subjects' requests regarding these rights within one month, in accordance with GDPR regulations

### **4 Data Processing Procedures**

**4.1** The Society will only process personal data when there is a lawful basis, such as consent, contract, legal obligation, vital interests, public task, or legitimate interests

**4.2** Data processing activities will be documented, including data flow mapping, purpose, lawful basis, and retention periods

**4.3** The Society will maintain records of processing activities as required by GDPR.

### **5 Data Security**

**5.1** The Society will implement appropriate technical and organisational measures to ensure the security of personal data

**5.2** Security measures will include encryption, access controls, regular security assessments, and training

### **6 Data Breach Notification**

**6.1** In the event of a data breach, the Society will notify the ICO and affected data subjects as required by GDPR



## **7 Data Protection Officer (DPO)**

**7.1** As a not-for-profit organisation, The Society is exempt from registering with the ICO and has no obligation to appoint a Data Protection Officer (DPO). However in line with best practice, The Society has appointed [The Secretary] responsible for monitoring GDPR compliance and serving as a point of contact for data subjects and supervisory authorities

## **8 Privacy by Design**

**8.1** The Company will implement a Privacy by Design approach, considering data protection at all stages of project development and business operations

## **9 International Data Transfers**

**9.1** The Society has no intention to engage in international data transfers

## **10 Training and Awareness**

**10.1** The Society will provide GDPR training and awareness programs to Management Committee members, volunteers and contractors who handle personal data

## **11 Review and Update**

**11.1** This GDPR policy will be reviewed and updated annually to ensure ongoing compliance with GDPR regulations

## **12 Conclusion**

**12.1** This GDPR policy demonstrates The Society's commitment to protecting the rights and privacy of data subjects in accordance with the General Data Protection Regulation. All Management Committee member, volunteers and contractors are responsible for adhering to this policy

**12.2** This GDPR policy should be reviewed in conjunction with The Society's Privacy Policy, a copy of which is available on our website



For questions or concerns regarding this policy or GDPR compliance, please contact us.

Date of this policy	[10/10/2023]
Review date	[10/10/2023]
Date Processing Officer	The Secretary
Contact	<a href="mailto:UlghamCBS@gmail.com">UlghamCBS@gmail.com</a>