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| The Friends of the Parish Church of St. Mary’s Old BasingRegistered Charity Number 1051202Data Retention Policy12th April 2018 |

1. Introduction

This Policy sets out the obligations of The Friends of the Parish Church of St. Mary’s Old Basing Registered Charity 1051202 (the Friends) regarding retention of personal data collected, held, and processed by the Friends in accordance with EU Regulation 2016/679 General Data Protection Regulation (“GDPR”).

The GDPR defines “personal data” as any information relating to an identified or identifiable natural person (a “data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person.

The GDPR also addresses “special category” personal data (also known as “sensitive” personal data). Such data includes, but is not necessarily limited to, data concerning the data subject’s race, ethnicity, politics, religion, trade union membership, genetics, biometrics (if used for ID purposes), health, sex life, or sexual orientation.

Under the GDPR, personal data shall be kept in a form which permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed.

In addition, the GDPR includes the right to erasure or “the right to be forgotten”. Data subjects have the right to have their personal data erased (and to prevent the processing of that personal data) in the following circumstances:

* + - 1. Where the personal data is no longer required for the purpose for which it was originally collected or processed (see above);
			2. When the data subject withdraws their consent;
			3. When the data subject objects to the processing of their personal data and the Friends have no overriding legitimate interest;
			4. When the personal data is processed unlawfully (i.e. in breach of the GDPR);
			5. When the personal data has to be erased to comply with a legal obligation; or
			6. Where the personal data is processed for the provision of information society services to a child.

This Policy sets out the type(s) of personal data held by the Friends for its charitable purposes and the periods for which that personal data is to be retained, the criteria for establishing and reviewing such period(s), and when and how it is to be deleted or otherwise disposed of.

For further information on other aspects of data protection and compliance with the GDPR, please refer to the Friends’ Data Protection Policy.

1. Aims and Objectives
	* 1. The primary aim of this Policy is to set out limits for the retention of personal data and to ensure that those limits, as well as further data subject rights to erasure, are complied with. By extension, this Policy aims to ensure that the Friends complies fully with its obligations and the rights of data subjects under the GDPR.
		2. In addition to safeguarding the rights of data subjects under the GDPR, by ensuring that excessive amounts of data are not retained by the Friends, this Policy also aims to improve the speed and efficiency of managing data.
2. Scope
	* 1. This Policy applies to all personal data held by the Friends.
		2. Personal data, as held by the Friends is stored in the following ways and in the following locations:
			1. Computers and mobile devices owned by the Chairman, Chairman designate, Treasurer, administrator of the 100 Club and Secretary of the Friends at their home addresses.
			2. Physical records stored at the home addresses of the above.
3. Data Disposal

Upon the expiry of the data retention periods set out below in Part 5 of this Policy, or when a data subject exercises their right to have their personal data erased, personal data shall be deleted, destroyed, or otherwise disposed of as follows:

* + 1. Personal data stored electronically (including any and all backups thereof) shall be deleted securely
		2. Personal data stored in hardcopy form shall be shredded **[ [**Special category personal data stored in hardcopy form shall be shredded.
1. Data Retention
	* 1. As stated above, and as required by law, the Friends shall not retain any personal data for any longer than is necessary in light of the purpose(s) for which that data is collected, held, and processed.
		2. Different types of personal data, used for different purposes, will necessarily be retained for different periods **(**and its retention periodically reviewed), as set out below.
		3. When establishing and/or reviewing retention periods, the following shall be taken into account:
			1. The objectives and requirements of the Friends;
			2. The type of personal data in question;
			3. The purpose(s) for which the data in question is collected, held, and processed;
			4. The Friends’ legal basis for collecting, holding, and processing that data;
			5. The category or categories of data subject to whom the data relates;
		4. If a precise retention period cannot be fixed for a particular type of data, criteria shall be established by which the retention of the data will be determined, thereby ensuring that the data in question, and the retention of that data, can be regularly reviewed against those criteria.
		5. Notwithstanding the following defined retention periods, certain personal data may be deleted or otherwise disposed of prior to the expiry of its defined retention period where a decision is made by the Trustees of the Friends to do so (whether in response to a request by a data subject or otherwise).
		6. It may also be necessary to retain personal data for longer periods where such retention is required by law.

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|  **Data Ref.** | **Type of Data** | **Purpose of Data** | **Review Period** | **Retention Period or Criteria** |
| 1. | Membership Records | To maintain records of members | April in each year | Two years from the last payment of a membership subscription |
| 2. | Gift Aid Records | To maintain records of Gift Aid claimed | April in each year | Six years from the end of the tax year in which the Gift Aid was claimed |
| 3. | Records of those who have taken part in the Charity’s Activities | To maintain contact with the supporter and involve the supporter in the future activities of the Charity | April in each year | 6 years from the date of the last activity |

1. Roles and Responsibilities
	* 1. The Friends’ Data Protection Officer is Ian Kershaw.
		2. The Data Protection Officer shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, the Friends’ other Data Protection-related policies (including, but not limited to, its Data Protection Policy), and with the GDPR and other applicable data protection legislation.
		3. Any questions regarding this Policy, the retention of personal data, or any other aspect of GDPR compliance should be referred to the Data Protection Officer.
2. Implementation of Policy

This Policy shall be deemed effective as of 25th May 2018. No part of this Policy shall

have retroactive effect and shall thus apply only to matters occurring on or after this date.

This Policy has been approved and authorised by the Trustees of the Friends on 6th June 2018

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| Signed Ian KershawChairman6th June 2018 |
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