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| The Friends of the Parish Church of St. Mary’s Old Basing  Charity Registered Number 1051202  Data Protection Policy  12th 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 Number 1051202 (the Friends) regarding data protection and the rights of members and supporters (“data subjects”) in respect of their personal data under 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.

This Policy sets the Friends’ obligations regarding the collection, processing, transfer, storage, and disposal of personal data. The procedures and principles set out herein must be followed at all times by the Friends, its agents, contractors, or other parties working on behalf of the Friends.

The Friends is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

1. The Data Protection Principles

This Policy aims to ensure compliance with the GDPR. The GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:

* + 1. Processed lawfully, fairly, and in a transparent manner in relation to the data subject.
    2. 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 in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
    3. Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.
    4. Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.
    5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research 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 the data subject.
    6. 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.

1. The Rights of Data Subjects

The GDPR sets out the following rights applicable to data subjects:

* + 1. The right to be informed.
    2. The right of access ;
    3. The right to rectification ;
    4. The right to erasure (also known as the ‘right to be forgotten’);
    5. The right to restrict processing ;
    6. The right to data portability ;
    7. The right to object ; and
    8. Rights with respect to automated decision-making and profiling

1. Lawful, Fair, and Transparent Data Processing
   * 1. The GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The GDPR states that processing of personal data shall be lawful if at least one of the following applies:
        1. The data subject has given consent to the processing of their personal data for one or more specific purposes;
        2. The processing is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract with them;
        3. The processing is necessary for compliance with a legal obligation to which the data controller is subject;
        4. The processing is necessary to protect the vital interests of the data subject or of another natural person;
        5. The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller; or
        6. The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.
2. Specified, Explicit, and Legitimate Purposes
   * 1. The Friends collects and processes the personal data set out in Part 17 of this Policy. This includes personal data collected directly from data subjects and from third parties
     2. The Friends only collects, processes, and holds personal data for the specific purposes set out in Part 17 of this Policy (or for other purposes expressly permitted by the GDPR).
3. Adequate, Relevant, and Limited Data Processing

The Friends will only collect and process personal data for and to the extent necessary for the purposes set out in Part 17, below.

1. Accuracy of Data and Keeping Data Up-to-Date
   * 1. The Friends willl ensure that all personal data collected, processed, and held by it is kept accurate and up-to-date. This includes, but is not limited to, the rectification of personal data at the request of a data subject, as set out in Part 12, below.
     2. The accuracy of personal data shall be checked when it is collected and at annual intervals thereafter. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.
2. Data Retention
   * 1. The Friends shall not keep personal data for any longer than is necessary in light of the purpose or purposes for which that personal data was originally collected, held, and processed.
     2. When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.
     3. For full details of the Friends’ approach to data retention, including retention periods for specific personal data types held by the Friends, please refer to our Data Retention Policy.
3. Secure Processing

The Friends shall ensure that all personal data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage.

1. Accountability and Record-Keeping
   * 1. The Friends’ Data Protection Officer is Ian Kershaw [igfkershaw@btinternet.com](mailto:igfkershaw@btinternet.com)
     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, and with the GDPR and other applicable data protection legislation.
     3. The Friends shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:
        1. The name and details of the Friends, its Data Protection Officer, and any applicable third-party data processors;
        2. The purposes for which the Friends collects, holds, and processes personal data;
        3. Details of the categories of personal data collected, held, and processed by the Friends, and the categories of data subject to which that personal data relates;
        4. Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;
        5. Details of how long personal data will be retained by the Friends (please refer to the Friends’ Data Retention Policy); and
2. Data Subject Access
   * 1. Data subjects may make subject access requests (“SARs”) at any time to find out more about the personal data which the Friends holds about them, what it is doing with that personal data, and why.
     2. Responses to SARs shall normally be made within four weeks of receipt.
     3. The Friends does not charge a fee for the handling of normal SARs. The Friends reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.
3. Rectification of Personal Data
   * 1. Data subjects have the right to require the Friends to rectify any of their personal data that is inaccurate or incomplete.
     2. The Friends shall rectify the personal data in question, and inform the data subject of that rectification, within one month of the data subject informing the Friends of the issue.
     3. In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.
4. Erasure of Personal Data
   * 1. Data subjects have the right to request that the Friends erases the personal data it holds about them in the following circumstances:
        1. It is no longer necessary for the Friends to hold that personal data with respect to the purpose for which it was originally collected or processed;
        2. The data subject wishes to withdraw their consent to the Friends holding and processing their personal data;
        3. The data subject objects to the Friends holding and processing their personal data (and there is no overriding legitimate interest to allow the Friends to continue doing so) (see Part 16 of this Policy for further details concerning the right to object);
        4. The personal data has been processed unlawfully;
        5. The personal data needs to be erased in order for the Friends to comply with a particular legal obligation
     2. Unless the Friends have reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject’s request.
     3. In the event that any personal data that is to be erased in response to a data subject’s request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).
5. Restriction of Personal Data Processing
   * 1. Data subjects may request that the Friends ceases processing the personal data it holds about them. If a data subject makes such a request, the Friends shall retain only the amount of personal data concerning that data subject (if any) that is necessary to ensure that the personal data in question is not processed further.
     2. In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).
6. Data Portability
   * 1. Where data subjects have given their consent to the Friends to process their personal data or processing is otherwise required for the performance of a contract between the Friends and the data subject, data subjects have the right, under the GDPR, to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other data controllers).
     2. Where technically feasible, if requested by a data subject, personal data shall be sent directly to the required data controller.
     3. All requests for copies of personal data shall be complied with within one month of the data subject’s request.
7. Objections to Personal Data Processing
   * 1. Data subjects have the right to object to the Friends processing their personal data
     2. Where a data subject objects to the Friends processing their personal data based on its legitimate interests, the Friends shall cease such processing immediately, unless it can be demonstrated that the Friends’s legitimate grounds for such processing override the data subject’s interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.
     3. Where a data subject objects to the Friends processing their personal data for direct marketing purposes, the Friends shall cease such processing immediately.
8. Personal Data Collected, Held, and Processed

The following personal data is collected, held, and processed by the Friends (for details of data retention, please refer to the Friends’ Data Retention Policy):

| **Data Ref.** | **Type of Data** | **Purpose of Data** |
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| 1 | Membership Records | To maintain records of members |
| 2. | Records of Gift Aid claims | To maintain records of claims made to HMRC |
| 2 | Records of those who have taken part in the Charity’s Activities | To maintain records of supporters, to enable them to be contacted about future activities and to publicise activities of the Friends |
| 3 | Records of members of the 100 clubs | To collect subscriptions and pay out prizes |

1. Data Security - Storage

The Friends shall ensure that personal data is stored securely.

1. Data Security - Disposal

When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it will be securely deleted and disposed of.

1. Data Security - Use of Personal Data

The Friends shall ensure that personal data is not shared without written consent.

1. Organisational Measures
   * 1. Trustees or other parties working on behalf of the Friends shall be made fully aware of both their individual responsibilities and the Friends’ responsibilities under the GDPR and under this Policy.
     2. Only those that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Friends;;
     3. Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed;
     4. All personal data held by the Friends will be reviewed periodically, as set out in the Friends’ Data Retention Policy
2. Transferring Personal Data to a Country Outside the EEA

The Friends will not transfer personal data to countries outside of the EEA.

1. Data Breach Notification
   * 1. All personal data breaches must be reported immediately to the Friends’ Data Protection Officer.
     2. If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Officer must ensure that the Information Commissioner’s Office is informed of the breach immediately.
     3. In the event that a personal data breach is likely to result in a high risk the Data Protection Officer must ensure that all affected data subjects are informed of the breach directly and without undue delay.
     4. Data breach notifications shall include the following information:
        1. The categories and approximate number of data subjects concerned;
        2. The categories and approximate number of personal data records concerned;
        3. The name and contact details of the Friends’ data protection officer (or other contact point where more information can be obtained);
        4. The likely consequences of the breach;
        5. Details of the measures taken, or proposed to be taken, by the Friends to address the breach including, where appropriate, measures to mitigate its possible adverse effects.
2. Implementation of Policy

This Policy shall be deemed effective as of 6th June 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:

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| **Name:** | Ian Kershaw |
| **Position:** | Chairman |
| **Date:** |  |
| **Due for Review by:** | May 2019 |
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