



# GDPR Policy

Sudden Sam



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*“Providing support in the aftermath of sudden death – you are not alone.”*

## Our Vision

Our vision is that Sudden Sam becomes a beacon of support for those enduring the pain and confusion of sudden loss, ensuring that no one faces the challenges of sudden death alone, thereby promoting healing, unity, and resilience within our community.

## Our Mission

Our mission is to ensure that, through support from Sudden Sam, families of loved ones who have died suddenly feel supported, both emotionally and financially and that the community, through public awareness, develop a greater understanding and empathy of their suffering.



## Our Aims

The aim of this GDPR policy is to ensure that Sudden Sam, a charity providing support in the aftermath of sudden death, fully complies with the General Data Protection Regulation (GDPR) and other relevant data protection laws. This policy is intended to:

1. **Safeguard Personal Data:** Protect the privacy and security of personal data collected, processed, and stored by Sudden Sam in the course of our support services. This includes ensuring that data is handled lawfully, transparently, and with respect for individuals' rights.
2. **Ensure Compliance:** Establish clear guidelines and procedures that ensure all activities involving personal data adhere to the principles and requirements set out by the GDPR and other relevant legislation.
3. **Maintain Trust:** Foster trust with beneficiaries, supporters, staff, and volunteers by demonstrating our commitment to data protection and by being transparent about how personal information is used and safeguarded.
4. **Minimise Risks:** Identify and mitigate risks associated with data breaches or misuse of personal information to protect both the individuals whose data we hold and the charity from potential harm or reputational damage.
5. **Promote Accountability:** Ensure that all staff, volunteers, and partners understand their responsibilities regarding data protection and are accountable for their actions when handling personal data.

By adhering to this policy, Sudden Sam aims to uphold the highest standards of data protection and privacy for all individuals associated with our charity.

The CEO is the Responsible Person for GDPR

## Legislation and Guidance

Our GDPR Policy has been created in conjunction and consideration of the following legislation and statutory guidance:

- Charity Commission Rules and Guidance
- GDPR Guidelines
- Data protection guidelines
- Code of Conduct
- Data Protection Policy
- Health and Safety Policy
- Safeguarding

## What is GDPR?

The General Data Protection Regulation (GDPR) is a legal framework established by the European Union to protect the privacy and personal data of individuals. Enforced since May 25, 2018, GDPR provides comprehensive guidelines on how organizations collect, process, store, and manage personal data. The



regulation is designed to give individuals more control over their personal data, ensuring that it is handled with care and respect for privacy.

For our charity, Sudden Sam, which supports those impacted by sudden death, GDPR compliance is essential to maintain the trust and confidentiality of the individuals we assist. We are committed to handling your personal data responsibly and in accordance with GDPR requirements. This means we will only collect and use your data for specific, legitimate purposes, ensure it is stored securely, and will not retain it for longer than necessary. We respect your rights under GDPR, including the rights to access, correct, or delete your personal data at any time.

By adhering to GDPR, Sudden Sam aims to protect the privacy of those we support while fostering a safe and compassionate environment for all.

## **Data Protection Principles**

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

Article 5 of the GDPR requires that personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to individuals;
- 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;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are 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 individuals;
- 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.”

## **General Provisions**

- This policy applies to all personal data processed by the Charity.
- The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
- This policy shall be reviewed at least annually.
- The Charity shall register with the Information Commissioner’s Office as an organisation that processes personal data.

## **Lawful, Fair and Transparent Processing**



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

## Lawful Purposes

- 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.
- Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- 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.

## Data Minimisation

- 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.

## Accuracy

- The Charity shall take reasonable steps to ensure personal data is accurate.
- 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.

## Archiving / Removal

- 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.
- The archiving policy shall consider what data should/must be retained, for how long, and why.

## Security

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

## 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 CEO.

## Links with Other Policies



This policy has been written with the following policies in mind:

- Safeguarding
- Data Protection
- Health and Safety
- Children and Young People
- Conflict of Interest