

# GDPR Policy

Version: 10/6/22

## Purpose

To ensure that the organisation collects processes personal data lawfully and complies with the requirements of the General Data Protection Regulation and Data Protection Act 2018. Personal data is information that relates to an identified or identifiable individual.

Padfield Community Spaces [PCS] will put into place the appropriate technical and organisational measures and maintain documentation of processing activities.

## Scope

Where PCS decides to collect or process personal data it is the **Controller** of the data and is required to manage that data in compliance with the Regulation and all data protection principles.

PCS will only process personal data where it is necessary for a specific purpose (which it will document) and where there is a lawful basis for processing. This will normally only be where the individual has given clear consent. Consent requires a positive clear and precise opt-in and can be easily withdrawn.

## Principles

PCS will manage personal data in accordance with the following principles;

- Process it lawfully, fairly and in a transparent manner.
- Collect and use it for specified, explicit and legitimate purposes only
- Collect only data that is adequate, relevant and limited in relation to the purpose for which it is collected.
- Ensure it is accurate and up to date and rectify inaccurate data without delay.
- Keep it in a form which permits identification of data subjects and keep for no longer than is necessary for the purpose for which it is collected.
- Ensure appropriate security, including against unauthorised and unlawful processing and loss, destruction or damage.

## Data Subject Rights

PCS will comply with the rights of individuals concerning the personal data about them it controls i.e;

- Right to know that information is kept concerning them.
- Right of access to that information.
- Right to rectify any information that is incorrect or misleading.
- Right to erase information.
- Right to restrict the processing of the information.
- Right to data portability.
- Right to object.
- Right to avoid automatic decision making.

## Padfield Community Spaces Privacy Notice

The privacy and security of your personal information is extremely important to us. This privacy notice explains how and why we use your personal data, to make sure you stay informed and can be confident about giving us your information.

**We do:** use your personal data to help us meet our objectives.

**We do:** respect your privacy and work hard to ensure we meet strict regulatory requirements.

**We don't:** sell your personal data to third parties.

We'll always protect your personal data and, as part of this, we regularly review our privacy notice so that you can see how we use your data and what your options are.

If you have any questions relating to this privacy notice or how we use your personal data, please contact us.

We will collect and use your personal data (this means any information which identifies you, or which can be identified as relating to you personally, such as your name, address, phone number, email address). We'll only collect the personal data we need and we'll make it clear at the point of collection why we are collecting it.

### How we use your personal data

We'll only use your personal data on relevant lawful grounds as permitted by the EU General Data Protection Regulation and Privacy of Electronic Communication Regulation.

We will use your personal data for the purpose or purposes outlined at the time you gave it to us.

We may also need to provide your personal data if we're asked by the police, or any other regulatory or government authority investigating suspected illegal activities.

### Newsletter communications

If you subscribe to receive our newsletter we will collect your name, email and/or postal address. You can always change your mind at a later date. This can be done through unsubscribing, or contacting us directly.

### Fundraising, donations and gifts in wills

We may invite you to support us by making a donation, getting involved in fundraising activities or leaving a gift in your will.

If you make a donation, we will use any personal information you give us to record the nature and amount of your gift, claim Gift Aid where you've told us you're eligible, thank you for your gift.

If you tell us you want to fundraise to support our cause, we will use the personal information you give us to record your plans and contact you to support your fundraising efforts.

Charity Commission rules require us to know where funds have come from, as well as any conditions attached to them. We follow a due diligence process which involves researching the financial soundness, credibility, reputation and ethical principles of donors who have made, or are likely to make, a significant donation to the PCS.

### Consultation

We carry out community consultation with our supporters, members, volunteers and local residents, to get feedback on their experience. We use this feedback to improve our offer and provide evidence for funding applications.

All the consultation we conduct is optional and you can choose not to take part.

Data derived from consultation will be amalgamated and anonymised, although we may also take the opportunity to invite you to subscribe to our newsletter or become a member (see relevant sections).

### Trustees, Members, Volunteers

If you're a Trustee, Member or Volunteer we may collect extra information about you (such as dates of birth, employment and voluntary history, conflicts of interest, DBS checks, details of emergency contacts or medical conditions). We will keep this information for legal or contractual reasons, to protect us (including in the event of an insurance or legal claim), and for safeguarding purposes.

We need to use your personal data to manage your involvement, from the moment you enquire to the time you decide to stop engaging with us.

We will hold data about a DBS Check as necessary.

### Photos

If you attend one of our events, we may take photographs for publicity purposes and to provide evidence to funding bodies.

## Consultants / Contractors

We will request and retain data from suppliers and contractors as necessary. For example, when requiring evidence of personal competency for Health & Safety reasons.

### How we secure your data

We will only use and store your information for as long as it is required for the purposes it was collected for. How long it will be stored for, depends on the information in question, what it is being used for and, sometimes, statutory legal requirements.

#### Mailchimp

We will use Mailchimp to manage our newsletter and enable the subscription process, including your ability to unsubscribe from emails.

Mailchimp is fully GDPR compliant and more information is available here:

<https://mailchimp.com/gdpr/>

#### Donorfy

We will use Donorfy to store the personal information of mailing list subscribers, supporters, members and other constituents and to facilitate mailing list signups and donations.

Donorfy is fully GDPR compliant and more information is available here:

<https://donorfy.com/data-protection>

#### Google Drive

We will use a password protected Google Drive to store personal data, including but not limited to; copies of trustee declarations, photos of events, contractor details etc.

#### Stripe

We will use Stripe for processing payments including donations.

Stripe is fully GDPR compliant and more information is available here:

<https://stripe.com/gb/guides/general-data-protection-regulation>

### Disclosing and sharing information

We will not sell your data nor, with limited exceptions, will we share your personal information for other organisations to use.

We may, however, disclose your personal information to third parties in order to comply with a legal obligation. For example, by passing on the personal details of trustees to the Charity Commission.

We will use third party applications to help store and manage data, for example Mailchimp.

## Access to personal data

You have a right of access to personal data held by us as a data controller. This right may be exercised by contacting us.

You may be asked to provide the following details:

- The personal information you want to access
- Where it is likely to be held
- The date range of the information you wish to access.

We will need you to confirm your identity. If we hold personal information about you, we will give you a copy of the information in an understandable format together with an explanation of why we hold and use it. We will aim to respond to any requests for information promptly, and in any event within the legally required time limits (30 days). This timeframe may be extended by up to two months if your request is particularly complex.

## Withdrawal of consent

Where you have given consent for us to use your personal data, you have the right to withdraw that consent at any time. Contact us, or unsubscribe from marketing emails.

## Amendment of personal data

We want you to remain in control of your personal data. You can update or amend your personal data by contacting us.

When practically possible, once we are informed that any personal data processed by us is no longer accurate, we will make corrections based on your updated information. The verification, update or amendment of your personal data will take place within 30 days of receipt of your request.