



GDPR – The General Data Protection Regulation

Birnbeck Regeneration Trust Data Protection Policy

(Effective from 24 May 2018)

1 Introduction

This policy sets out the intention of the Birnbeck Regeneration Trust (henceforth “BRT”) (Registered Charity No. 1103012 and Private Limited Company No. 05077252) to comply with the General Data Protection Regulation (GDPR) (EU) 2016/679 which enters force on 25 May 2018.

Compliance with the GDPR is a legal requirement. It is a regulation in EU law on data protection and privacy for all individuals within the European Union and the European Economic Area.

The BRT is adopting the provisions of the GDPR in order to protect any and all personal data supplied to the BRT by its patrons/trustees/directors/officers and all other interested parties, including the BRT’s volunteers and members of the general public who interact with the Trust. The supply of this data is routinely necessary and normally provided in order to enable the effective management, organisation, functionality and running of the charity.

‘Patrons’ are defined as being those individuals who have accepted a formal offer from the BRT to become a patron of the BRT.

‘Trustees and Directors’ are defined as being those individuals who have been nominated and elected to hold these positions in accordance with the BRT’s formal constitution. As such, these individuals are registered at Companies House.

‘Officers’ are defined as being those individuals who have been nominated and elected to hold these specific positions in accordance with the BRT’s formal constitution. At the present time these positions are defined as being those of Treasurer and Secretary.

‘Volunteers’ are defined as being those individuals who interact with the BRT on a regular or irregular basis giving freely of their own time, abilities, knowledge and expertise (etc.) to help and assist the BRT to further the advance of its overall and elsewhere defined aims.

‘Members of the general public’ is an inclusive term and does not require further definition.

2 Key principles of the Policy

The BRT intends to collect and hold the minimum amount of personal data relating to the above-mentioned individuals that is necessary for the effective operation of the BRT.

The BRT intends to ensure that all such personal data is held by the smallest number of people

necessary for the effective operation of the charity.

The BRT intends to hold the personal data relating to the above-mentioned individuals only for as long as they remain involved with and/or interact with the BRT and continue to give their permission for their data to be held by the BRT.

The BRT intends to destroy all records containing personal data relating to any the above-mentioned individuals after an appropriate administrative period of time when any the above-mentioned individuals cease to be involved or further interact with the BRT or when any the above-mentioned individuals inform the BRT that they no longer give permission for the BRT to hold their personal data.

3 Personal Data Held

The GDPR requires that data may not be processed unless there is at least one lawful basis to do so.

The normal lawful reason for the BRT to hold personal data is that processing of this data is necessary for the performance of a contract to which the data subject is party or to take steps at the request of the data subject prior to entering into a contract.

It is also a requirement that the data subject has given consent to the processing of their personal data for one or more specific purposes.

The nature of personal data normally held by the BRT will normally be limited to the following:

- Name
- Postal Address including Postcode
- Telephone number(s)
- E-mail address(es)
- Details of a contactable third-party who may need to be notified in the case of an emergency.

In some circumstances an age group may also be recorded.

It may be the case that data subject(s) furnish the BRT further information beyond that which it has asked for. This data is similarly protected.

4 How Personal Data is held

Any personal data received from any of the above-mentioned individuals will be securely held by the BRT, mainly in the form of e-mail correspondence and resulting address book entries. Depending on the source of personal data, the data will be processed/used by the nominated representative of the BRT who normally administers the type of activity that the source represents. The BRT has a number of separate e-mail accounts, depending on purpose. Each one is separately password protected, these passwords are not centrally held although all are redundantly and securely accessible.

The BRT will also keep personal data records in the form of Volunteer Agreement Forms. These, by necessity, will include details of a contactable third-party, to include the matter of relationship, who

may need to be notified in the case of an unforeseen negative circumstance or emergency.

The BRT makes use of Gift Aid forms. These contain the same information as listed above and are dealt with for accounting purposes in the normal way.

5 Removal of Personal Data

When any of the above-mentioned individuals cease to be involved or further interact with the BRT or when any the above-mentioned individuals inform the BRT that they no longer give permission for the BRT to hold their personal data that data will be deleted from all the BRT's systems after an appropriate administrative period of time.

6 E-mails to the BRT

All e-mails from the BRT will have the following statement attached:

(Name)

(Position)

Birnbeck Regeneration Trust

Registered Charity number 1103012

Registered Business number 05077252

This electronic mail message, including any attachments, is a confidential communication exclusively between the Birnbeck Regeneration Trust and the intended recipient(s) indicated as the addressee(s). It contains information which is private and may be proprietary or covered by legal professional privilege. If you receive this message in any form and you are not the intended recipient you must not review, use, disclose or disseminate it. We would be grateful if you could contact the sender upon receipt and in any event you should destroy this message without delay. Anything contained in this message that is not connected with the business of the Birnbeck Regeneration Trust is neither endorsed by nor is the liability of this company.

In order to comply with the requirements of the General Data Protection Regulation (GDPR) (EU) 2016/679 of 25 May 2018 we need your permission to process any personally identifiable information (your "personal data") that is included in any reply to this e-mail or in any other correspondence that you may send us. This includes your name and e-mail address. In replying to this e-mail you confirm to us, the Birnbeck Regeneration Trust, that you give us full permission to retain this data for as long as is necessary for the agreed purpose which is normally defined by the subject line of this e-mail. If you wish to withdraw this permission at any time in the future and have us delete any of your stored personal data please contact us at gdpr@birnbeckregenerationtrust.org.uk

7 Website

The Birnbeck Regeneration Trust website can be found at www.birnbeckregenerationtrust.org.uk

It does not use cookies and the host, <https://www.1and1.co.uk>, only collects certain statistical anonymised data.

Statistics Available in 1&1 SiteAnalytics

1&1 SiteAnalytics allow access the following statistics:

- Visitor figures: Visitors, sessions, page impressions and search engine bots.
- Visitor behaviour: Average session duration, page impressions per session and bounce rate.
- Page analysis: Landing pages, exit pages, error pages, most visited pages, pages with high bounce rates and search terms.
- Origins: All pages of origin, visitor locations and referring pages.
- Browsers & systems: Browsers, browser versions, operating systems and operating system versions.

No personal data is recordable by the website. We normally credit photographers and other contributors by name and their Facebook page identity with their continuing permission.

8 Data Protection Officer

The GDPR requires the designation of a Data Protection Officer (DPO) in the circumstances of an organisation being:

- A public authority (except for courts acting in their judicial capacity);
- an organisation that carries out the regular and systematic monitoring of individuals on a large scale;
- an organisation that carries out the large scale processing of special categories of data, such as health records, or information about criminal convictions.

Due to the small size and limited operation of the BRT it is not required to formally designate a DPO, nor to register with the Information Commissioner's Office.

9 Sharing of Data

The Trust does not share any personal data with any other company or organisation

10 Subject Access Requests

Any individual can request a copy of their data as held by the Trust by contacting us at gdpr@birnbeckregenerationtrust.org.uk. There is no charge resulting from a request to update or remove data.

11 Data Breaches

Any data breach will be reported to and discussed by the BRT's governing board and any necessary action taken.

12 Adoption

This policy was adopted by the BRT on 24 May 2018 and is subject to updating in light of further review of applicable circumstances.

The policy is due for overall review in May 2020.