

Data Protection Policy

The GesherEU Support Network

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Definitions

Charity	means The GesherEU Support Network, a registered charity.
Member	means (in this document) a user of the charity's services and activities.
GDPR	means the General Data Protection Regulation.
Responsible Person	means Robert Bernard - a Trustee of GesherEU.
Register of Systems	means a register of all systems or contexts in which personal data is processed by the Charity.

1. 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:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. 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;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. 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;
- e. 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; and
- f. 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."

2. General provisions

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity has performed a self assessment (see Appendix I) and is under not requirement to register with the Information Commissioner's Office as an organisation that processes personal data.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. 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.

4. Lawful purposes

- a. 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 ([see ICO guidance for more information](#)).
- b. The Charity shall note the appropriate lawful basis in Appendix II..
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. 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.

5. Data minimisation

- a. 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.
- b. GesherEU sometimes needs to collect data about its members in order to apply for grants (eg which borough they live in). This will be stored in a separate data space to any personal data with only an indicator that the member has or has not supplied the information attached to his/her basic membership information.

6. Accuracy

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. 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. Since some members choose to opt out of one or more of the social media communications, an email list of all members will be used as the definitive list of members. We do not currently hold home addresses. This email list will be used when it is essential to contact members including checks on the accuracy of other data that is held on the individual.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy (Appendix III) for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

8. Security

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

9. 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 ICO ([more information on the ICO website](#)).

END OF POLICY

APPENDIX I

ICO registration self assessment

ICO self assessment performed at <https://ico.org.uk/for-organisations/register/self-assessment> on 1 March 2018

Registration self-assessment

1. Do you use CCTV for the purposes of crime prevention?

No

2. Are you processing personal information?

Yes

3. Do you process the information electronically?

Yes

4. Is your organisation responsible for deciding how the information is processed?

Yes

5. Do you only process information for one of the following purposes?

No

6. Are you a not-for-profit organisation that qualifies for an exemption?

Yes

You are under no requirement to register

APPENDIX II

The lawful bases for processing data

The lawful bases for processing data are listed by the ICO [here](#)

Member data

Having undertaken a detailed review of the possible appropriate lawful basis for processing, it was concluded that consent was inappropriate since GesherEU members expect to be notified of events and to keep in touch with each other via social media (from which they are free to opt out). Asking them to consent to us using the data in this way is not a real option for them. To opt out would mean that would no longer be active as members so there is no real option for them (whilst they remain members). Members

would be making no real choice. No member data will be passed to other organisations. We therefore rely on legitimate interests for processing member data.

Volunteer data

As for member data, since we hold very little data over and above contact data and essential compliance information (eg dates of DBS checks) we again conclude that consent as a lawful basis for processing would be inappropriate as opting out would make it impossible to volunteer. We therefore rely on *legitimate interests* for processing volunteer data. No volunteer data will be passed to other organisations.

Donor data

GesherEU does not currently process individuals' data for marketing or fundraising.

APPENDIX III

GesherEU Archiving Policy

Removal of members

Members who ask to be removed from the membership list will have their data removed from the active list of members within 7 days. Old member contact information will be held in an 'past members' list for 3 years in case there arises a legal requirement to contact that member. Access to the 'past members' list will be restricted to the Trustees. Only the name, email address and phone number will be retained on the 'old members' list.

Removal of volunteers

Volunteers who ask to be removed from the volunteers list will have their data removed from the active list of volunteers within 7 days. Old volunteer contact information will be held in an 'past volunteers' list for 3 years in case there arises a legal requirement to contact that volunteer. Access to the 'past volunteers' list will be restricted to the Trustees. Only the name, email address and phone number will be retained on the 'old volunteers' list.