Horseman's Green Community Group - Data Protection Policy

Policy statement
Horseman's Green Community Group (HGCG) is committed to protecting the rights and privacy of individuals, voluntary and community group members, volunteers and others in accordance with the General Data Protection Regulations 2018 (GDPR).

Legal Requirements
Data are protected by the GDPR, its purpose is to protect the rights and privacy of individuals and to ensure that personal data are not processed without their knowledge, and, wherever possible, is not processed without their consent.

The Act requires us to register the fact that we hold personal data and to acknowledge the right of 'subject access' – voluntary and community group members must have the right to copies of their own data.

Managing Data Protection

Purpose of data held by the Community Group
Data may be held by us for the following purposes:
1. Volunteer administration
2. Fundraising
3. Realising the Objectives of a Charitable Organisation
4. Accounts & records
5. Advertising, marketing & public relations
6. Information and databank administration
7. Journalism and media
8. Research

Data Protection Principles
In terms of the GDPR, HGCG is the 'data controller', and as such determines the purpose for which, and the manner in which, any personal data are, or are to be, processed.
HGCG 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 or statistical purposes shall not be considered to be incompatible with the initial purpose.
c. adequate, relevant and limited to what is necessary in relation to the purposes of 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;
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 damaged, using appropriate or organisational measures.

General provisions
a. this policy applies to all personal data processed by HGCG
b. the Trustees shall take responsibility for HGCG ongoing compliance with this policy
c. this policy shall be reviewed annually
d. HGCG shall register with the Information Commissioner's Office as an organisation that processes personal data

Lawful, fair and transparent processing

a. to ensure its processing of data is lawful fair and transparent, HGCG shall maintain a Data Protection Procedure
b. The Data Protection Procedure will be reviewed at least annually
c. Individuals have the right to access their personal data and any such requests made to HGCG shall be dealt with in a timely manner

Data minimisation

a. HGCG 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

a. HGCG shall take reasonable steps to ensure personal data is accurate
b. where necessary steps shall be put in place to ensure that personal data is kept up to date

Archiving/removal

a. to ensure that personal data is kept no longer than necessary, HGCG shall put in place an archiving procedure and review this annually

Security

a. HGCG 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 shall be in place to avoid unauthorised sharing of information
c. when personal data is deleted this should be done safety such that the data is irrecoverable
d. appropriate back-up and disaster recovery solutions shall be in place.

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