

# Grow Community – Sopwell's

## GDPR Policy

Written by: .....K. Swindells and J. Cooney..... Date:  
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Adopted: .....25/10/2019.....

Reviewed and amended (if appropriate) by: .....J. Cooney..... Date:  
.....11/11/2022.....

Removed references to work applications and payroll as not applicable to this organisation. Note that the data review of information that we keep is due in the next review cycle (2025).

Data Protection Lead:.....Jo Cooney.....

### Table of Contents

1. The scope of our GDPR Policy	1
2. How and why we might collect data and what we might use it for	2
3. How we keep your data safe	2
4. How long data is kept for	2
5. Third parties	3
6. How we use cookies on our website	3
7. The Policy as a living document	3

## 1. The scope of our GDPR Policy

The General Data Protection Regulation (GDPR) requires us to keep your personal data safe by design and default; it helps people control how their data is collected and used by organisations. Personal data only includes data where a person can be identified directly from the information given or could be indirectly identified when the data is combined with other information. This Policy sets out how we might collect and use your data, and how we protect the data that we collect.

## 2. How and why we might collect data and what we might use it for

Who we might collect data about	What data we might collect	Why we might collect it
<ul style="list-style-type: none"><li>• Committee members</li><li>• Contractors</li><li>• Volunteers</li><li>• Local residents</li><li>• Individuals from partner organisations</li></ul>	<ul style="list-style-type: none"><li>• Your name.</li><li>• Your organisation details.</li><li>• Contact information including your address and e-mail address.</li><li>• Demographic information such as date of birth, gender and ethnic origin.</li></ul>	<ul style="list-style-type: none"><li>• Internal record keeping e.g. to build up a community database.</li><li>• Supervision / appraisal records.</li><li>• Training records.</li><li>• Supporting petitions.</li><li>• Fundraising and to help with grant funding opportunities.</li><li>• Sharing news.</li></ul>

<ul style="list-style-type: none"> <li>• Individuals from local businesses</li> </ul>	<ul style="list-style-type: none"> <li>• Other information relevant to customer surveys and to complete grant applications.</li> </ul>	<ul style="list-style-type: none"> <li>• Promoting training and activity opportunities, and event information.</li> <li>• Getting feedback to improve services.</li> <li>• Safeguarding including DBS.</li> </ul>
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Data that you give us must be freely given on an opt-in basis (in most cases), specific, informed and unambiguous. You have the right to ask for a copy of the personal data we hold about you or correct an error in your data by contacting us.

We will only collect contact information for people over the age of 18 years old.

### 3. How we keep your data safe

We endeavour to protect your data using:

- physical procedures e.g. data on paper is kept in a lockable room, cupboard or filing cabinet; paper records are disposed of responsibly;
- electronic means e.g. using strong passwords (passwords including upper and lower case letters, a number and, where possible, a symbol); portable devices (memory sticks or laptops) carrying information are encrypted;
- managerial procedures e.g. we will not sell or lease your information; we will only distribute your information with your permission or when legally required to do so; only authorised people have access to data (e.g. Trustees in the development phases, relevant managers and employees in an operating Community Centre).

We have a duty to report any personal data breaches that pose a risk to people's rights and freedoms to the Information Commissioner's Office (ICO) and, in some cases, to the individuals affected. This includes any breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

### 4. How long data is kept for

Data should not be kept for longer than necessary. Once the data is no longer relevant, we will not keep it for longer than six years (two review cycles of this Policy) unless the data is anonymised.

You have the right to be forgotten: you can request us to delete your personal data from our records at any time.

### 5. Third parties

We will not disclose your data to third parties unless we have specifically requested to do so and have explained to you why we are sharing the information, or we are obliged or permitted by law. Where we share information, it should be made clear to you why we are sharing that information.

Where we use third parties e.g. external payroll providers or IT support companies, we will review our agreements with them to ensure the third party agrees to comply with GDPR regulations.

Our website may contain links to other websites we think you might find interesting. However, we can't control other websites so once you leave our site, please be aware that we can't guarantee the protection and privacy of any information you give these other sites. Exercise caution and take a look at the privacy statements of other websites.

## **6. How we use cookies on our website**

Should we further develop our website, we may use cookies. If you give permission, a cookie is a small file placed on your computer's hard drive that analyses web traffic. It helps personalise your web browsing by remembering information about your preferences. Websites use cookies to know which pages are being looked at. We would use this for statistical analyses to help us identify which web pages are useful to our users and which are not, so we can improve our website.

## **7. The Policy as a living document**

Our data records, our data procedures and this Policy will be reviewed at least every three years and, where appropriate, the Policy amended as necessary. We may amend this Policy as required by law.