Shropshire Cerebral Palsy Society

Registered Charity No. 217156

**Shropshire Cerebral Palsy Society**

**PO Box 265**

**Oswestry**

**Shropshire**

**SY10 1FB**

DATA PRIVACY

POLICY

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CONTENTS

What Is GDPR?

Information Audit

Info We Collect

Source of Info

How Received

Where Stored

Why Kept

Legal Basis

Removing, Updating, Restricting, or Obtaining Your Personal Data

Disposal of Personal Data

Contact Us

WHAT IS GDPR?

The General Data Protection Regulation (GDPR) comes into effect on the 25th May 2018 and in the UK will replace the previous Data Protection Act (1998). It describes how organisations must collect, handle, and store personal data[[1]](#footnote-1).

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.

It also states[[2]](#footnote-2):

“the controller [Shropshire Cerebral Pasly] shall be responsible for, and be able to demonstrate, compliance with the principles.”

INFORMATION AUDIT

SHROPSHIRE CEREBRAL PALSY AS A CONTROLLER

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Trustees and Potential Trustees | | | | | | |
| **Info We Collect** | **Source of Info** | **How Received** | **Where Stored** | **Why Kept** | **Legal Basis** | |
| Trustee names, addresses, email addresses and telephone numbers | Trustees and potential Trustees application letters | electronically and post | On SCP email and paper copies in accounts files | To report to the Charity Commission, safeguarding, account applications and other statutory reporting. | Legitimate Interest | |
| Trustee References | References | electronically and post | On SCP email and paper copies | To report to the Charity Commission | Legitimate Interest | |
| Applicants (both granted and declined) | | | | | | |
| Name, address, DOB, telephone number, email address. Name, phone number, email address and details of personal applying if not applicant | Applicants, grant form | electronically and post | On SCP email and paper copies | To facilitate grant payments | | Legitimate Interest |
| Minutes of meetings before beneficiary names were anonymised | Secretary | Electronically and passed from previous trustees | On SCP email and paper copies | For statutory record keeping | | Legitimate Interest |
| Text Messages from other trustees about grant payments | Applicants and Trustees | Electronically | Personal mobile phone | To facilitate grant payments | | Legitimate Interest |
| Diagnosis letters for beneficiaries (including medical history) | Applicants with first grant application | electronically and post | On SCP email and paper copies in accounts files | For financial records, to ensure correct use of charitable funds and to report to statutory bodies if required. | | Legitimate Interest |
| Quotes for beneficiaries | With grant form from applicants | electronically and post | On SCP email and paper copies in accounts files | For financial records, to ensure correct use of charitable funds and to report to statutory bodies if required. | | Legitimate Interest |
| supporting letters for beneficiaries | With grant form from applicants | electronically and post | On SCP email and paper copies in accounts files | For financial records, to ensure correct use of charitable funds and to report to statutory bodies if required. | | Legitimate Interest |
| Financial information about beneficiaries | Applicants | electronically and post | On SCP email and paper copies in accounts files | For financial records, to ensure correct use of charitable funds and to report to statutory bodies if required. | | Legitimate Interest |
| Bank Mandates and forms with trustee details | Trustees | Via post | On SCP email and paper copies in accounts files | For the efficient management of the charity's finances | | Legitimate Interest |
| Financial information about beneficiaries | Applicants/  Trustees | Electronically | Computer at BBH Legal Services. Password protected. | For the efficient management of the charity's finances | | Legitimate Interest |

We will keep your personal data for the purposes set out in this data privacy policy and only for as long as any legal basis continues to apply. Below is a non-exhaustive list of some of the reasons we need to retain your personal data:

* Compliance with the requirements of the Financial Conduct Authority
* Compliance with Anti Money Laundering Regulations
* Reporting obligations to the Charity Commission
* Ensuring we have relevant information in the event of any queries or complaints
* To assist with the establishment, exercise or defence of legal claims

The length of time we need to keep the personal data will vary depending on the nature of the personal data and the reason we are obliged to hold it.

We may transfer your personal data to the following third parties:

* To supplies you have identified in your grant application in order for the items to be delivered
* Technology service providers – our partners who provide IT and website services.
* Telephone providers – our partners who provide telephone services and functionality.
* Delivery companies – our couriers, parcel firms and mail firms who deliver your goods or services and manage any returns on our behalf.
* Regulators and other governmental agencies or law enforcement agencies.

MARKETING

We will only use your personal information (email addresses) to send you information where you have made a positive opt-in by ticking the box on the grant application form.

If your preferences ever change for any reason please let us know by emailing [**enquiries@shropshirecerebralpalsysociety.co.uk**](mailto:enquiries@shropshirecerebralpalsysociety.co.uk) .

REMOVING, UPDATING, RESTRICTING, OR OBTAINING YOUR PERSONAL DATA

You have the right to:

* Ask what information we have about you, and why.
* Ask how to gain access to that information.
* Ask for that information to be deleted/removed, updated, or restricted.
* Ask to move, copy, or transfer the information from our IT environment to another

These requests should be made via post. This is to ensure that all requests are made in writing and can be documented.

Requests will be reviewed and answered within one calendar month. No reasonable requests will be denied.

Identities will be verified before information is handed out.

Information will be given formally in writing.

Deletion/removal request within reasonable grounds will be accepted providing we are not required by law to keep them.

It is important that the personal information we hold about you is correct and current. Please keep us informed if your information changes during your contract with us.

DISPOSAL OF YOUR PERSONAL DATA

When it comes to disposing of your personal data we do so in a secure way. All printed and written documentation including any personal details are shredded before disposal. All emails and electronic forms of personal data are deleted at all instances of storage.

CONTACT US

If you have any queries about anything in the policy, or anything else, then please feel free to contact us.

We are contactable by post, email or facebook.

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**Oswestry**

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[**https://www.facebook.com/Shropshire-Cerebral-Palsy-Society-386540014694233/**](https://www.facebook.com/Shropshire-Cerebral-Palsy-Society-386540014694233/)

[**enquiries@shropshirecerebralpalsysociety.co.uk**](mailto:enquiries@shropshirecerebralpalsysociety.co.uk)

[**www.shropshirecerebralpalsysociety.co.uk**](https://l.facebook.com/l.php?u=http%3A%2F%2Fwww.shropshirecerebralpalsysociety.co.uk%2F&h=ATOYSM5P0FJKkiwxsHmx6JUH3Enk_DKO-GlTB_G6hoTvsMvdkyjIpTv6pGuhnOX1G_-uxDIDBPqZmnG64hTBPKQ5fD1l6H1N_5fSp-SuAA-Pd8OYN8LYAqv8)

1. Official Journal of the European Union – Page 35-36 – http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN [↑](#footnote-ref-1)
2. Official Journal of the European Union – Page 36 –http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679&from=EN [↑](#footnote-ref-2)