

Strength in Feathers Data Protection Policy:

The Charity will ensure that all personal data that it holds will be:

- processed lawfully, fairly and in a transparent manner;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary;
- accurate and kept up to date;
- kept in a form which permits identification of data subjects for no longer than is necessary;
- 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.

Data Protection Policy

Under the EU General Data Protection Regulations (GDPR) Strength in Feathers (herein after referred to as “the CIC”) is required to comply with the GDPR and undertakes to do so.

Data Subject

A data subject is an identifiable individual person about whom the CIC holds personal data.

Contact Information

For the purposes of this Policy, “Contact Information” means any or all of the person’s:

- full name (including any preferences about how they like to be called);
- full postal address;
- telephone and/or mobile number(s);
- e-mail address(es);
- social media IDs/UserNames (*eg*: Facebook, Instagram, Twitter, Skype, Hangouts, WhatsApp)

2. Principles of the GDPR {Art:5}

The CIC will ensure that all personal data that it holds will 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.

3. Lawful Processing

The CIC will obtain, hold and process all personal data in accordance with the GDPR for the following lawful purposes.

By Consent

People who are interested in, and wish to be kept informed of, the activities of the CIC.

The information collected may additionally contain details of any particular areas of interest about which the person wishes to be kept informed.

The information provided will be held and processed solely for the purpose of providing the information requested by the person.

By Contract

People who sell goods and/or services to, and/or purchase goods and/or services from the CIC.

The information collected will additionally contain details of:

- a) The goods/services being sold to, or purchased from the CIC
- b) Bank and other details necessary and relevant to the making or receiving of payments for the goods/services being sold to, or purchased from the CIC

The information provided will be held and processed solely for the purpose of managing the contract between the Charity and the person for the supply or purchase of goods/services.

By Legal Obligation

People where there is a legal obligation on the CIC to collect, process and share information with a third party – eg: the legal obligations to collect, process and share with HM Revenue & Customs payroll information on employees.

The information provided will be held, processed and shared with others solely for the purpose meeting the Charity's legal obligations.

By Vital Interest

The Charity undertakes no activities which require the collection, holding and/or processing of personal information for reasons of vital interest.

By Public Task

The Charity undertakes no public tasks which require the collection, holding and/or processing of personal information.

Legitimate Interest

Volunteers, Including Trustees

In order to be able to operate efficiently, effectively and economically, it is in the legitimate interests of the CIC to hold such personal information on its volunteers and trustees as will enable it to communicate.

Individual Rights

Note: The following clauses are taken primarily from the guidance provided by the Office of the Information Commissioner, <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-to-be-informed/>

The right to be informed {Arts 12-14}

When collecting personal information the CIC will provide to the data subject free of charge, a Privacy Policy written in clear and plain language which is concise, transparent, intelligible and easily accessible containing the following information:

Identity and contact details of the controller

Note: where the organisation has a controller's representative and/or a data protection officer, their contact details should also be included

Purpose of the processing and the lawful basis for the processing

The legitimate interests of the controller or third party, where applicable

Categories of personal data

Not applicable if the data are obtained directly from the data subject

Any recipient or categories of recipients of the personal data

Details of transfers to third country and safeguards

Retention period or criteria used to determine the retention period

The existence of each of data subject's rights

The right to withdraw consent at any time, where relevant

The right to lodge a complaint with a supervisory authority

The source the personal data originates from and whether it came from publicly accessible sources

Not applicable if the data are obtained directly from the data subject

Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data

Not applicable if the data are NOT obtained directly from the data subject

The existence of automated decision making, including profiling and information about how decisions are made, the significance and the consequences.

Data Controller

Emliy Wheeler is the Data Controller for the CIC and will periodically undergo appropriate training commensurate with the scale and nature of the personal data that the CIC holds and processes under the GDPR.

Data Processing Location

Data Processors shall only process data in a secure location, and not in any public place, *eg:* locations where the data could be overlooked by others, or the removable data storage devices would be susceptible to loss or theft.

Computers/laptops in use for data processing will not be left unattended at any time.

Data Subjects

Rights of Access, Rectification and Erasure

Data subjects will be clearly informed of their right to access their personal data and to request that any errors or omissions be corrected.

Under no circumstance will the CIC share with, sell or otherwise make available to Third Parties any personal data except where it is necessary and unavoidable to do so in pursuit of its charitable objects as authorised by the Data Controller.

Whenever possible, data subjects will be informed in advance of the necessity to share their personal data with a Third Party in pursuit of the CIC objects.

Before sharing personal data with a Third Party the CIC will take all reasonable steps to verify that the Third Party is, itself, compliant with the provisions of the GDPR and confirmed in a written contract. The contract will specify that:

The CIC is the owner of the data;

The Third Party will hold and process all data shared with it exclusively as specified by the instructions of the Data Controller;

The Third Party will not use the data for its own purposes;

The Third Party will adopt prevailing industry standard best practice to ensure that the data are held securely and protected from theft, corruption or loss;

The Third Party will be responsible for the consequences of any theft, breach, corruption or loss of the CIC's data (including any fines or other penalties imposed by the Information Commissioner's Office) unless such theft, breach, corruption or loss was a direct and unavoidable consequence of the Third Party complying with the data processing instructions of the Data Controller

The Third Party will not share the data, or the results of any analysis or other processing of the data with any other party without the explicit written permission of the Data Controller;

The Third Party will securely delete all data that it holds on behalf of the CIC once the purpose of processing the data has been accomplished.

Privacy Policy & Privacy Notices

The Charity will have a Privacy Policy and appropriate Privacy Notices which it will make available to everyone on whom it holds and processes personal data, in accordance with 5.1.

