

GOAT WALK LAND TRUST

DATA PROTECTION POLICY

1. Information on Data Protection.

Information on the new GDPR, the Trust's Data Protection Policy and its Privacy Policy will be circulated to existing Trustees and Management Committee members and to new Trustees and MC members on their appointment.

2. Identification of Data

Trustees and members of the Management Committee will confirm whether they hold any personal data. Data should only consist of names, contact details, membership or volunteer status, responses to the GWLT public consultation and donations (including Gift Aid details) together with specific enquiries to the Trust. Responses will be documented. In view of the requirements of the GDPR personal data will in future only be held by

- a. the Treasurer and membership secretary and,
- b. so far as is necessary for responses to Data Protection enquires and complaints, the Trustee assigned to deal with Data Protection issues under Paragraph 4 below and
- c. so far as is necessary for responses to enquiries, the organisation of volunteers or in pursuance of the objects of GWLT, a Trustee or member of the Management Committee so authorised by the Trustees.

All other data will be deleted or anonymised.

3. Retention of information

Membership details other than names and addresses are renewed on an annual basis.

GWLT is required to keep Gift Aid details for seven years.

All other information will be kept for a period not exceeding seven years from its supply or resupply to the GWLT.

4. Privacy Notices

GWLT will agree a Privacy Policy (the present policy is attached as Appendix 1) and review it as appropriate. Under GDPR privacy notices must give additional information such as how long GWLT will keep data and what lawful basis we have to process data. The Privacy Policy will include all the requirements of GDPR for a privacy notice and this will be provided to people providing personal data to GWLT and a copy will be posted on the GWLT website.

5. Individual Rights

The Trust's Data Protection and Privacy policies set out an individual's rights under GDPR. One Trustee will be assigned to deal with all GDPR enquires and responses. The Trustees will review the extent of data held by the Trust to ensure that it is

consistent with the Data Protection Principles set out in the Data Protection Act 1998.

6. Responses to Subject Access Requests

As the Trust does not have its own computer, the data will be held on the computers of two Trustees so that the Trust can respond if one of the people holding the data is on holiday.

7. Lawful Basis for Processing Data

As a non profit making charity, GWLT will rely on processing in accordance with its “legitimate interests” as the lawful basis for its processing of personal data. This will be set out on the Trust’s web site within its Privacy Policy together with the purposes for which we collect the data.

8. Consent

Except where required by law (See 8 below) GWLT will not rely on consent as its lawful basis for processing personal data.

9. Data on children.

No person under 16 can be a member of the Trust and for Child Protection reasons we are not able to have children as volunteers. However, persons under 16 may be associate members of the GWLT. Existing records will be checked and the appropriate consent obtained from the parents of any person under 16, or the records deleted. The application form for associate membership for members who are under 16 will include an additional appropriately worded section for the consent of the associate member’s parent.

10. Personal Data Breaches.

The data that is held by GWLT is limited and held on the personal computers of two Trustees. These computers will be held in a secure place, not open to public access and the data will be protected by a secure password. Any actual or potential breach of the privacy of personal data will be reported to the Trustee assigned responsibility for Data Protection who will investigate the breach and report to the Board of Trustees.

11. Protection of Personal Data.

Projects involving the use of personal data are outside the remit of the Trust and impact assessments will not be necessary. However, the current requirements for security remain. As the personal data held by the Trust is located on the personal computers of Trustees, these computers should be held securely, computer files protected by passwords and hard copy data should be securely locked away. Computer files containing sensitive personal data should be encrypted when transferred.

12. Responsibility for Data Protection

The Trust shall appoint a Trustee to be responsible for Data Protection.

13. Data Protection and Fundraising.

GWLT will rely on its “legitimate interests” as the lawful basis for processing data including contacting its members concerning fund raising.

November 2018

Revised 1 May 2019