



# Data Protection & GDPR Policy

**Version:** 1.0

**Approved:** January 2025

**Review due:** January 2026

## Version control

Version	Amendment(s)	Date approved

## 1. Introduction

Friends of Berrycroft (FoB) is committed to protecting and respecting your privacy. This Data Protection and GDPR Policy outlines how we collect, use, store, and safeguard personal data in accordance with the General Data Protection Regulation (GDPR) (EU) 2016/679, the Data Protection Act 2018, and other relevant UK data protection legislation.

## 2. Purpose of data processing

At FoB, we are committed to processing personal data in a lawful, fair, and transparent manner. The personal data we collect serves specific, legitimate purposes related to our charitable activities. The main purposes for which we process personal data include:

- To communicate with individuals who support our charity's work, including donors, volunteers, and beneficiaries.
- To process and manage donations, issue receipts, and claim Gift Aid where applicable, in line with relevant financial regulations and tax requirements.
- To offer and manage the services we provide to beneficiaries, including support and advocacy services, and event participation.
- To ensure compliance with laws and regulations applicable to charities, including accounting, tax reporting, safeguarding, and regulatory reporting.
- To understand how we can improve our services, communications, and charitable offerings through feedback and evaluation of our work.
- To send updates, newsletters, and event information (with your consent) to inform our supporters and the wider public about the charity's activities.
- To ensure the safety of individuals participating in events or interacting with our charity, and to protect the organisation from fraud or legal claims.

All data processing will be carried out in alignment with these purposes, and we will not use personal data for purposes that are incompatible with those outlined above.

## 3. Legal basis for data processing

Under the GDPR, we are required to ensure that personal data is processed lawfully, fairly, and transparently. We will only process personal data when one of the following legal bases apply:

- We may process personal data if individuals have provided explicit consent for a specific purpose.

- We may process personal data to fulfil contractual obligations, e.g., providing services, communication with donors, or event registration.
- We may process personal data when we are required to do so by law.
- We may process personal data based on our legitimate interests, provided those interests are not overridden by the rights and freedoms of individuals.

## 4. Information we collect

We collect various types of personal data, which may include but are not limited to:

- **Personal details:** Name, address, phone number, email address, date of birth.
- **Donation and financial data:** Bank account details, payment history, donation amounts.
- **Employment details:** If you are a volunteer or employee, we may collect employment-related information, including references, qualifications, and work history.
- **Communication records:** Correspondence, interactions, and feedback.
- **Event participation details:** If you attend an event, we may record your registration and participation.

## 5. How we use your data

We use the personal data we collect for the following purposes:

- To provide services, process donations, and communicate with supporters.
- To comply with legal obligations (e.g., tax reporting, charity registration requirements).
- To send you updates, newsletters, and event information (with your consent).
- To maintain our records and improve our services.
- To fulfil any contractual agreements or to respond to queries.

## 6. Data sharing

We do not share personal data with third parties, except in the following circumstances:

- **Service providers** who support our operations (e.g., payment processors, IT service providers), and who are contractually obligated to safeguard the data.
- **Legal or regulatory authorities**, if required by law (e.g., HMRC for gift aid claims, or other regulators).

- **Partners or collaborators** where you have explicitly agreed to this, such as for joint fundraising campaigns or events.

## 7. Data retention

We will retain your personal data only for as long as necessary for the purposes for which it was collected or to meet legal, regulatory, or operational requirements. Personal data that is no longer required will be securely deleted or anonymised.

## 8. Your rights

Under the GDPR, individuals have several rights regarding their personal data. These include:

- **Right to access:** You can request a copy of the personal data we hold about you.
- **Right to rectification:** You can request that we correct or update any inaccurate or incomplete data.
- **Right to erasure (Right to be forgotten):** You can request that we delete your personal data, subject to certain conditions.
- **Right to restriction of processing:** You can request that we restrict the processing of your personal data in certain situations.
- **Right to data portability:** You can request that we transfer your data to another organisation in a machine-readable format.
- **Right to object:** You can object to the processing of your personal data based on our legitimate interests or direct marketing purposes.
- **Right to withdraw consent:** If we are relying on your consent for processing, you have the right to withdraw it at any time.

If you wish to exercise any of these rights, please contact us using the details in the contact section below.

## 9. Security of your data

We are committed to ensuring the security of your personal data. We use appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access. These measures include secure storage, encryption, and restricted access.

## 10. Roles and responsibilities

### 10.1 Data Protection Officer (DPO)

The primary responsibilities of the nominated Data Protection Officer include:

- Monitoring and ensuring that the charity complies with all applicable data protection laws, including GDPR and the Data Protection Act 2018.
- Providing guidance and training to staff, trustees, and volunteers on data protection policies and best practices.
- Conducting regular audits to assess data protection practices and recommend improvements where necessary.
- Acting as the primary point of contact for data protection queries from individuals, the Information Commissioner's Office (ICO), and other relevant authorities.
- Identifying, managing, and mitigating risks related to the processing of personal data.
- Ensuring that personal data breaches are reported to the ICO within 72 hours, as per GDPR requirements.

### 10.2 Trustees

The Trustees are responsible for ensuring the charity is compliant with data protection legislation and safeguarding the personal data of those we work with. Their responsibilities include:

- Ensuring the charity has appropriate policies, procedures, and controls in place to protect personal data.
- Reviewing and approving this Data Protection and GDPR Policy.
- Ensuring that data protection and privacy are embedded into the charity's operations, decision-making processes, and strategic planning.
- Assisting the Data Protection Officer in their role and ensuring that any necessary resources are allocated to data protection activities.
- Taking appropriate action to address any risks identified regarding personal data.

### 10.3 Volunteers

Volunteers play an important role in supporting the charity's mission and must follow the data protection practices outlined by the charity. Their responsibilities include:

- Ensuring that all personal data they access or handle is kept confidential and is only used for the purposes for which it was collected.
- Familiarising themselves with and adhering to the charity's Data Protection and GDPR Policy, as well as any related procedures or guidance provided.
- Reporting any suspected data protection issues or breaches to the DPO or the relevant contact person immediately.

- Collecting, using, or sharing only the necessary amount of personal data to carry out their specific duties.

## 11. Cookies and Online Tracking

Our website may use cookies to collect certain information automatically, such as IP addresses and browsing behaviour. Cookies are small data files stored on your device to improve your website experience. You can manage cookie preferences through your web browser settings.

## 12. International Data Transfers

As a UK-based charity, we primarily store and process personal data within the UK. However, if we need to transfer personal data outside the UK, we will ensure that appropriate safeguards are in place, such as ensuring the recipient country has an adequate level of data protection or implementing Standard Contractual Clauses (SCCs) in accordance with GDPR.

## 13. Changes to this Policy

We may update this policy from time to time to reflect changes in legislation, best practices, or our data processing activities. When we do, we will notify you of any material changes and update the date at the top of this policy.

## 14. Contact information

If you have any questions about this Data Protection and GDPR Policy or wish to **exercise your rights under GDPR, please contact us:**

Friends of Berrycroft

Berrycroft Community Health Centre, 2 Nimrod Street, Aylesbury, HP18 1BB

Tel: 01296 310940 Email: [chair@friendsofberrycroft.org](mailto:chair@friendsofberrycroft.org)

## 15. Relevant legislation and guidance

This policy complies with the following legislation and guidelines:

- General Data Protection Regulation (GDPR) (EU) 2016/679
- Data Protection Act 2018 (UK)
- The Privacy and Electronic Communications (EC Directive) Regulations 2003
- UK Information Commissioner's Office (ICO) Guidelines

## 16. Policy Approval

This Data Protection and GDPR Policy is approved by the Board of Trustees of Friends of Berrycroft and is effective from the date below.

Approved by: (Signature)



Approved by: (PRINT NAME)

Jacqueline Harris

Chair of Trustees, Friends of Berrycroft

Date: \_\_\_\_\_26/01/2025\_\_\_\_\_