

## Data Protection Policy for Nick Webber Trust

We will keep your data securely and in-line with regulations, and never pass it on to anybody else (except to claim Gift Aid on your donations if you have given us our permission).

If you would like to see what data we hold for you, you can request that by emailing [info@nickwebbertrust.org.uk](mailto:info@nickwebbertrust.org.uk).

If you would like us to delete any of your personal data held by us, please contact [info@nickwebbertrust.org.uk](mailto:info@nickwebbertrust.org.uk). The person responsible for data protection within the Nick Webber Trust is Mary Marvel.

## Data Protection Principles

The Nick Webber Trust is committed to processing data in accordance with its responsibilities under the General Data Protection Regulations.

Article 5 of the GDPR requires that personal data shall 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;
- 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;
- 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;
- 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.

### 2. General Provisions

- a) This policy applies to all personal data processed by the Nick Webber Trust.
- b) Mary Marvel shall take responsibility for the charity's ongoing compliance with this policy.
- c) This policy shall be reviewed annually.

### 3. Lawful, fair and transparent processing

- a) To ensure its processing of data is lawful, fair and transparent, the Nick Webber Trust shall maintain a register of all systems or contexts in which personal data is processed by the charity.
- b) This register shall be reviewed annually.
- c) Individuals have the right to access their personal data and any such requests made to the Nick Webber Trust shall be dealt with as soon as possible.

### 4. Lawful Purposes

- a) All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- b) The charity shall note the appropriate lawful basis in the register of systems.
- c) Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d) Where communications are sent to individuals based on their consent, the option for that individual to revoke their consent will be clearly available.

### 5. Data minimisation

a) The charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

#### 6. Accuracy

a) The charity shall take reasonable steps to ensure personal data is accurate.

b) Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

#### 7. Archiving/Removal

a) To ensure that personal data is kept for no longer than is necessary, the charity shall put in place an archiving policy for each area in which personal data is processed and review this policy annually.

b) The archiving policy shall consider what data should/must be retained, for how long, and why.

#### 8. Security

a) The charity shall ensure that personal data is stored securely.

b) Access to personal data shall be limited to personnel who need access, and appropriate security should be in place to avoid unauthorised sharing of information.

c) When personal data is deleted this will be done securely such that the personal data is irrecoverable.

d) Appropriate back-up and disaster recovery solutions shall be in place.

#### 9. Breach

In the event of a breach of security leading to accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the charity shall promptly assess the risk to people's rights and freedoms and if appropriate report the breach to the ICO.