

# Privacy Notice

## Walesby Forest

Revision: Client 1  
10 May 2018

# Definitions

<b>Charity</b>	means Walesby Forest, a registered charity. No 1147348
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	means Ian Sinclair (DPO)
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the Charity.

## 1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. data is only collected and retained for legitimate use: These uses are: Consent, Legitimate Interest, Contract, Legal Obligation, Public interest and or Vital interest of data subject
- b. processed lawfully, fairly and in a transparent manner in relation to individuals;
- c. 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;
- d. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- e. 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;
- f. 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
- g. 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.”

## **2. General provisions**

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person (DPO) shall take responsibility for the Charity's on-going compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity shall register with the Information Commissioner's Office as an organisation that processes personal data.

## **3. Lawful, fair and transparent processing**

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

## **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 ([see ICO guidance for more information](#)).
- 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 the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

## **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.
- b. [Add considerations relevant to the Charity's particular systems]

## **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.
- c. [Add considerations relevant to the Charity's particular systems]

## **7. Archiving / removal**

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archiving policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.

## **8. Your Rights**

**Access:** The right to be provided with a copy of your personal data

**Rectification:** The right to require us to correct any mistakes in your personal data

**To be forgotten:** The right to require us to delete your personal data—in certain situations

**Restriction of processing:** The right to require us to restrict processing of your personal data—in certain circumstances, eg if you contest the accuracy of the data

**Data portability:** The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations

**To object:** The right to object: