

**PRIVACY POLICY**

**1. Purpose**

The aim of the Charity (SBOSCC) is: “to undertake common effort.... for the inhabitants of South Brent and neighbourhood.....to advance education and to provide facilities in the interests of social welfare for recreation and leisure time occupation with the object of improving the conditions of life for the said inhabitants”.

The purpose of this privacy policy is to set out in simple terms the way in which we collect, store, use and safeguard the personal data you provide to SBOSCC in becoming a Friend, Member or Volunteer and supporting us in pursuit of our aim. Personal data can include name, address, telephone number, e mail address; in short any information that can be used to uniquely identify you.

The General Data Protection Regulations (GDPR) of 2018 seeks to enhance the rights of the individual in relation to personal data held by an organisation by requiring improved transparency. This means that you as a Friend or Member of SBOSCC have the right to request that details of your personal data held by the charity must be provided to you and to ask for it to be amended or deleted.

SBOSCC as a community organisation is committed to respecting the rights and interests of our friends, members and volunteers and seeks to comply with the GDPR in the way we collect, use and store your personal data.

**2. Legitimate Interests**

The GDPR permits the holding of personal data for a number of lawful reasons including “legitimate interests”. SBOSCC Trustees have undertaken a detailed Legitimate Interests Assessment to demonstrate compliance with GDPR and is available for inspection by applying to the Manager, summarised in Section 3 below. On the basis of the assessment we consider that SBOSCC has a legitimate interest in storing your personal data as summarised in Section 3.

**3. Legitimate Interest Assessment**

- *Purpose*

We need to store your personal data (name, address, email) so that we have a record of contact details for all Friends/Members/Volunteers of the SBOCC charity. We also hold records of the payment of subscriptions by Friends/Members (individual, family or life), date paid and the amount.

This data we need to hold for the following reasons:

- To contact Volunteers
- To post or deliver newsletters (at least two per year) and from time to time publicity material for events going on at the Centre
- To contact Friends or Members regarding renewal of subscriptions
- To apply for Gift Aid to HMRC
- For accounting purposes to satisfy our financial auditors and the requirements of HMRC.

- *Necessity*

For the purposes listed above we consider it necessary and legitimate to store personal data of Friends/Members/Volunteers of SBOSCC who support our aim.

- *Balancing Test*

We consider that SBOSCC Friends/Members/Volunteers would reasonably expect us to store and process their personal data for the purposes above and in pursuit of the aim of the Charity.

We consider that the rights and interests of individual Friends, Members or Volunteers are not harmed or overridden by SBOSCC maintaining a database of their personal data.

#### **4. Communicating our Privacy Policy**

Summary details of our Privacy Policy will be included with the application form for new Friends/Members/Volunteers outlining the data we will hold, how it is stored; how to get a copy or how to have the data amended or erased.

We will publicise our Privacy Policy to existing Friends/Members/Volunteers either by letter, email or publicising in our newsletter and by including it in a prominent position on our website

#### **5. Personal Data Held**

- Friends/Members/Volunteers
  - Name
  - Address
  - Telephone number (when provided)
  - Email address (when provided)
  
- Friends/Members
  - Type of subscription (individual, family or life)
  - How paid (cash, standing order, cheque)
  - Amount paid
  - Date paid

#### **6. Access to your Personal Data Record**

You can obtain a copy of your personal data on application to the Manager, who will provide it within 30 days free of charge to you. You can also apply to the Manager to amend or erase your data.

#### **7. Personal Data Storage Arrangements**

Your data will be stored in a password protected spreadsheet set up in "Google Docs" with access limited to the Trustee responsible for membership (D MacDiarmid), the Manager and the Chair of Trustees.

For the purposes of IT hosting and maintenance your information may be situated outside of the UK. We have verified that our cloud provider adheres to several self-regulatory frameworks, including the EU-US Privacy Shield Framework; and that it works with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding transfer of personal data that cannot be resolved with users directly.

#### **8. Data Security Breaches**

All suspected breaches in data shall be reported to the Manager as soon as practically possible. Friends/Members affected by any data breach will be informed. Serious data breaches will be reported to the Information Commissioner's Office (ICO).

#### **9. Retention of Data**

Data will be retained for as long as necessary to satisfy the requirements of the HMRC for tax return purposes or claiming grant aid or when deletion of data is requested by a Friend or Member of SBOSCC.

