



## **South Brent Old School Community Centre Privacy, Confidentiality and Data Protection Policy**

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 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, Customer, Supplier, and supporting us in pursuit of our aim. Personal data can include name, address, telephone number, email address; in short any information that can be used to uniquely identify you.

The General Data Protection Regulation (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/Member/Volunteer/Customer/Supplier 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 them 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.

### **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, summarised below. On the basis of the assessment we consider that SBOSCC has a legitimate interest in storing your personal data as summarised below.

### **Legitimate Interest Assessment**

- *Purpose*

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

We need to hold this data for the following reasons:

- To contact you as necessary
- To send newsletters and from time to time publicity material for events going on at the Centre
- 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/Customers/Suppliers of SBOSCC who support our aim.

- *Balancing Test*

We consider that SBOSCC Friends/Members/Volunteers/Customers/Suppliers would reasonably expect us to securely store and process their personal data for the purposes above and in pursuit of the aims of the Charity. We consider that the rights and interests of individual Friends/Members/Volunteers/Customers/Suppliers are not harmed or overridden by SBOSCC maintaining a database of their personal data.

### **Communicating our Policy**

Summary details of this 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. A copy of this policy will also be available on our website.

### **Personal Data Held**

- Friends/Members/Volunteers:
  - Name
  - Address
  - Telephone number (when provided)
  - Email address
- Friends/Members:
  - Type of subscription (individual, family or life)
  - How paid (cash, standing order, cheque)
  - Amount paid
  - Date paid
- Gift Aid:
  - Completed gift aid forms including signature and confirmation that you are a UK taxpayer
- Customers and Suppliers:
  - Name
  - Address
  - Telephone number
  - Email address

### **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. You can also apply to the Manager to amend or erase your data.

### **Personal Data Storage Arrangements**

Members', Friends' and Volunteers' personal data will be securely stored in a password protected spreadsheet with access limited to the Trustee responsible for membership, the Centre Manager and the Chair of Trustees. Customers' and Suppliers' data will be securely stored within our accounting software.

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.

### **Data Security Breaches**

All suspected breaches in data shall be reported to the Manager immediately. Anyone affected by any data breach will be informed. Serious data breaches will be reported to the Information Commissioner's Office (ICO) immediately.

### **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.

### **Responsibility**

Trustees and the Manager are responsible for the safe and confidential storage of all information.

### **Archive**

The Charity holds a range of historic papers – some retained for general interest and others as a statutory requirement. The following are contained in archive boxes under the terms of this policy.

- Historia Accounts
- Photos, Press and Exhibitions
- Grant Applications
- Building Surveys and Work

### **Policy Review / Update Procedure**

This Version Approved by Trustees:	April 2025
Next Review Due: This document should be reviewed every three years or: <ul style="list-style-type: none"><li>• following any changes in relevant legislation or regulations, or;</li><li>• when any incident has occurred or feedback reported relating to this policy.</li></ul>	April 2028
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Person(s) responsible for updating	Michelle Parton, Rik Meek, Sheila Alexander