

Data Protection Policy

Friends of the Holy Land Institute for the Deaf

Last updated	21 st May 2018
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Definitions

Charity	Friends of the Holy Land Institute for the Deaf, a registered charity No. 1079893.
GDPR	The General Data Protection Regulation.
Responsible Person	Timothy Martin c/o May Cottage, Church Lane, Upper Dean, Huntingdon Cambridgeshire. PE28 0NB

1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR. Under Article 5 of the GDPR this 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; 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;
- 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; 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;
- 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; 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
- 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, 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 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. 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.
- b. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- c. 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.

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 necessary, the Charity shall put in place an archiving policy and review this process 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 using modern software that is kept-up-to-date.
- 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 should be done safely such that the 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 the 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 this breach to the ICO.

1. What data do we hold?

Name, postal address, email address (if supplied), telephone number (if supplied). Record of donations received, and any tax claims submitted to HMRC.

2. Where is the data held?

Personal computer with back-up copy on separate disk drive. Files are password protected. Data is not held on the internet and is not shared or passed to any third parties other than in the circumstances specified at point 4 below.

3. How has data been collected?

Data has been supplied by individual donors and interested supporters who have made direct contact with the charity.

4. Is the data shared with any third parties?

Where a donor has given permission that the charity may make a Gift Aid claim on their donation their name, address, donation amount and date of last donation is supplied to HMRC.

5. For what purpose is the data held?

The data is used to contact donors, former donors and persons expressing an interest in the work of the charity and/or the Holy Land Institute for the Deaf to supply them with information and news regarding the work of the charity and the Institute in Jordan, and to solicit donations for the benefit of the work of the Institute and to make claims for Gift Aid.

6. How is data kept up to date?

The accuracy of the data is reliant upon amendments being supplied to the charity by those persons on the database. Corrections to an individual's record and/or mailing preferences can be notified by contacting: The Chairman, or the Responsible Person, c/o May Cottage, Church Lane, Upper Dean, Huntingdon Cambridgeshire PE28 0NB or emailed to jonathan@holyland-deaf.org. Anyone wishing to be removed from the database can contact the Chairman, or the Responsible Person, at the above address and have their data removed from the current list of donors and supporters save for any data which relates to previous donations or Gift Aid Tax claims which shall be retained by the charity in compliance with requirements of the Charity Commission and HMRC.

7. How long will data be retained

Data shall be retained until receipt of notification of a request for removal or notification of the decease of an individual.