



SAVE OUR SHROPSHIRE CIO POLICY DOCUMENT

POLICY: GENERAL DATA PROTECTION REGULATION (GDPR)



1. Purpose of Policy Document

- 1.1. Save Our Shropshire CIO (SOS CIO) is a registered charity (number 1195247) that supports education and facilitation of projects that will enable the people of Shropshire to reach Net-Zero Carbon emissions by 2030 and reduce to negative beyond 2030.
- 1.2. Under UK regulations the charity is required to comply with the General Data Protection Regulations (GDPR)
- 1.3. This Policy documents how Save Our Shropshire CIO processes and manages personal data held in electronic and paper form. In particular the document covers:
 - Identification of our Data Controller
 - Provision of the lawful basis for processing personal data
 - The scope of personal data which we hold and process
 - The scope of special category data, which we hold and process
 - The description and justification of our data retention policy
 - How we intend to respond to Special Access Requests
 - The provision of a copy of our privacy notice

The provisions of this policy come into effect on 2nd August 2021.

2. The principles of GDPR

- 2.1. SOS CIO will ensure that all of the personal data which it holds will be:
 - Processed lawfully, fairly and in a transparent manner in relation to individuals
 - 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;
 - adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

3. Definitions of items covered by GDPR

- 3.1. Data Subject.** A data subject is an identifiable individual person about whom the Charity holds personal data.
- 3.2. Contact Information.** For the purposes of this policy, "Contact Information" means all or any of the person's:
1. **Full Name** (including any preferences about how they like to be called)
 2. **Full postal address**
 3. **Telephone numbers** (both land lines and mobile numbers)
 4. **Email address(es)**
 5. **National Insurance Code**
 6. **Employee ID**
 7. **Social media IDs/User Names** (e.g. for Facebook, Twitter, Skype, Hangouts and Whatsapp)

4. Lawful Processing of data.

In all cases the information collected, held and processed will include all or some of the Contact Information as defined in section 3 above.

SOS CIO will obtain, hold and process all personal data in accordance with the GDPR for the following lawful purposes:

4.1. By Consent

Contact information will be collected from data subjects for people who are interested in, and wish to be kept informed of, the activities of the Charity in our Mailing List Database which is stored at the Data Controller's premises.

Subject to the person's consent, this may include information selected and forwarded by the Charity on activities relevant to those of the Charity by other organisations.

Note: this will not involve providing the person's personal data to another organisation.

The information collected on the data subject may therefore additionally contain details of any particular areas of interest about which the person wishes to be kept informed.



The information provided will be held and processed solely for the purpose of providing the information requested by the person.

4.2. By Contract

SOS CIO will hold data on those people who sell goods and/or services to, and/or purchase goods and/or services from the Charity.

The information collected will additionally contain details of:

- a) The goods/services being sold to, or purchased from the Charity;
- b) Bank and other details necessary and relevant to the making or receiving of payments for the goods/services being sold to, or purchased from the Charity.

The information provided will be held and processed solely for the purpose of managing the contract(s) between SOS CIO and the person responsible for the supply or purchase of goods/services.

4.3. By Legal Obligation.

SOS CIO will collect data on those people where there is a legal obligation on SOS CIO to collect, process and share information with a third party – e.g. the legal obligations to collect, process and share with HM Revenue & Customers payroll information on employees of the Charity.

The information provided will be held, processed and shared with others solely for the purpose meeting the Charity's legal obligations.

Taxation (HM Revenue and Customs)

For the purpose of managing an employee's PAYE and other taxation affairs the information collected will additionally contain details, as required by HM Revenue & Customs, of:

- The person's National Insurance Number;
- The person's taxation codes;
- The person's salary/wages, benefits, taxation deductions and payments;
- Such other information as may be required by HM Revenue & Customs.

Such data on employees may also include:

- Political opinions



- Religious beliefs
- Trade union activities
- Sexual orientation
- Race and ethnic origin
- Details of criminal offences
- Physical and mental health

Pensions

Where pensions might be provided by SOS CIO, then for the purpose of managing an employee's statutory pension rights the information collected will additionally contain details, as required by the Charity's pension scheme of:

- The person's National Insurance Number;
- The person's salary/wages, benefits, taxation and payments;
- Such other information as may be required by the pension scheme.

4.4. By Public Task.

SOS CIO will collect personal data from people where it is involved in projects for the public benefit

4.5. Legitimate Interest

SOS CIO will collect information on volunteers who work for but are not engaged in contractual employment with SOS CIO. This information will be held, processed and shared with others solely for the purpose of meeting SOS CIO's legal obligations on maintaining volunteer agreements as described in the Volunteers' policy.

5. Individual rights

The following clauses detail the rights which persons have with respect to the collection of information collected by SOS CIO with respect to the GDPR legislation

5.1. The right to be informed.

When collecting personal information SOS CIO will provide to the data subject on request and free of charge a Privacy Policy written in clear and plain language, which is concise, transparent, intelligible and easily accessible containing the following information:



- Identity and contact details of the Data controller
- Purpose of the processing of the data, and the lawful basis for the processing
- The legitimate interests of the controller or third party where applicable
- Categories of personal data collected (which is not applicable if the data has been obtained directly from the data subject)
- Any recipient or categories of recipients of the personal data
- Details of transfers to third country and safeguards
- Retention period or criteria used to determine the retention period
- The existence of each of the data subject's rights
- The right to withdraw consent at any time, where relevant
- The right to lodge a complaint with a supervisory authority
- The source from which the personal data originates, and whether it came from publicly accessible sources (which is not applicable if the data came direct from the data subject).
- Whether the provision of the personal data is part of statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data.
- The existence of automated decision-making including profiling and information about how the decisions are made, the significance and the consequences.

In the case that the data are obtained directly from the data subject, then the information will be provided at the time the data are obtained.

If the data are not obtained directly from the data subject, then the information will be provided within a one month of when SOS CIO has obtained the data

Or

If the data are used to communicate with the data subject, at the latest, when the first communication takes place

Or

If disclosure to another recipient is envisaged, at the latest, before the data is disclosed.

5.2. The right of access

The data subject shall have the right to obtain from the data controller confirmation as to whether or not personal data concerning him/her are being



processed, and, where that is the case, access to his/her personal data and the information detailed in the Charity's relevant Privacy Policy.

5.3. The right to rectification

The data subject shall have the right to require the data controller without undue delay to rectify any inaccurate or incomplete personal data concerning him/her.

5.4. The right to erase

Except where the data are held for purposes of legal obligation or public task (4.3 or 4.4) the data subject shall have the right to require the controller without undue delay to erase any personal data concerning him/her.

Note: This provision is also known as "The right to be forgotten".

5.5. The right to restrict processing

Where there is a dispute between the data subject and the Controller about the accuracy, validity or legality of data held by the Charity the data subject shall have the right to require the controller to cease processing the data for a reasonable period of time to allow the dispute to be resolved.

5.6. The right to data portability

Where data are held for purposes of consent or contract (4.1 or 4.2) the data subject shall have the right to require the controller to provide him/her with a copy in a structured, commonly used and machine-readable format of the data which he/she has provided to the controller, and have the right to transmit those data to another controller without hindrance

5.7. The right to object

5.7.1 The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him/her which is based on Public Task or Legitimate Interest (4.4 or 4.5),



including profiling based on those provisions. The controller shall no longer process the personal data unless the controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

- 5.7.2 Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him/her for such marketing, which includes profiling to the extent that it is related to such direct marketing.
- 5.7.3 Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.
- 5.7.4 At the latest at the time of the first communication with the data subject, the rights referred to in paragraphs 5.7.1 and 5.7.3 shall be explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information.

5.8. Rights in relation to automated decision-making and profiling

Except where it is: a) based on the data subject's explicit consent, or b) necessary for entering into, or performance of, a contract between the data subject and a data controller, the data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or similarly significantly affects him/her.

6. Data Controller

6.1. A Data Controller will be appointed by the Board of Trustees, who will be responsible for the management of our data. Details of who they are and how you can contact them is in our document titled "GDPR Privacy Policy".

6.2. In the absence of the Data Controller for any reason (e.g. they are on holiday or on sick leave), then the Chair of the Trustees will act as Data Controller.



6.3. The Data Controller shall implement the appropriate technical and organisational measures to ensure and be able to demonstrate that processing is performed in accordance with GDPR regulations

6.4. These measures will be reviewed every 12 months and updated where necessary.

7. Privacy notice

Save Our Shropshire will undertake to ensure all parties sharing their personal data can have the opportunity to read our privacy notice.

We will:

- Publish our privacy notice on Save Our Shropshire's website at www.saveourshropshire.org/Privacy-Notice
- Add a link to our privacy notice to staff email signatures, and to employee's email signatures
- Add a link to our privacy notice on Save Our Shropshire's auto-response on Microsoft Outlook
- Direct parties who contact us via letter and telephone to our privacy notice online or supply them with a paper copy if needed.
- Modify our voicemail messages to include information about how constituents can read our privacy notice.