



## Data Protection Policy

### Church Crookham and Fleet Mens Shed

#### Data Protection Statement

Church Crookham and Fleet Mens Shed is classified as a Data Controller under the General Data Protection Regulation (the GDPR). This policy outlines our commitment to protecting the personal data of people in relation to our organisation's work in accordance with the GDPR – as regulated by The Information Commissioner's Office (ICO), the UK authority on data protection - and carrying out any data processing with transparency, accountability and good governance.

The six lawful bases for processing personal data are listed below, and at least one of them must legitimately apply to any data you collect or process from any natural person.

**Consent:** the individual has given clear consent for you to process their personal data for a specific purpose.

**Contract:** the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

**Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).

**Vital interests:** the processing is necessary to protect someone's life. The ICO state that this lawful basis is likely to be relevant for emergency medical care, when you need to process personal data for medical purposes but the individual is *incapable of giving consent to the processing*.

**Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

**Legitimate interests:** the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

#### Privacy Statement

This **Privacy Statement** tells you what to expect when Church Crookham and Fleet Mens Shed collects personal information. It applies to information we collect on this form and elsewhere about you and to members and trustees of the Trust; volunteers; speakers and other event organisers; participants in events; applicants or grants; and people who use our website and our social media pages (Facebook and Twitter).

#### Who we are and how to contact us

We are Church Crookham and Fleet Mens Shed, Charity number CIO1171613.

Our address is:

c/o Church Crookham Parish Council  
Church Crookham Community Centre  
Boyce Road  
Church Crookham  
GU52 8AQ

We can be contacted at this address or by email to our Data Controller at: [info@ccandfmensshed.org.uk](mailto:info@ccandfmensshed.org.uk)



### **What information we collect from you and what we do with it**

The provision of information by you on page 1, at events and on our website and social media pages is entirely voluntary. We collect this information to manage the membership of the “Shed” so that we can send you newsletters and event invitations, to process orders for any products you purchase from us, to record attendance at our events, so that we can process grant applications, and for administration and regulatory purposes.

More information about the types of data we collect and what we do with it is in our Data Protection Policy published on our website at <http://www.ccandfmensshed.org.uk>.

### **What we will not do with your data**

We will not sell or rent your personal information to third parties or transfer it to other countries. Your data will not be used for automated decision making.

### **Who might we share your information with and why?**

We share your information with trusted third parties for administrative purposes. These organisations have systems to protect your data and will not share your data with third parties. We use Google Drive to store electronic membership forms. We use MailChimp to administer membership records including applications and renewals, payments, and email distribution. We use Eventbrite for online event registration and administration. We use JustGiving to collect donations to the Trust. We use Mailchimp to mail our newsletters. We use QuickFile to store member details for financial transactions with the shed.

### **How long do we keep hold of your information?**

We will not retain it for longer than is necessary to comply with legal requirements.

### **How can I access the information you hold about me?**

You can write to us or email us at the addresses provided above. If we do hold information about you, you can ask us to correct any mistakes by contacting us and providing us with the correct information.

### **Your rights in respect of your data**

You have rights which you can exercise in relation to the information we hold about you. You can read more about these rights at <https://ico.org.uk/for-the-public/is-my-information-being-handled-correctly/>. These include the right to withdraw consent at any time and the right to lodge a complaint with the Information Commissioner’s Office.

### **Cookies**

You can read more about how we use cookies on our website at <http://www.bvct.org.uk/cookie-policy/>.

#### **Other websites**

This Privacy Notice does not cover the links within our website or Social Media pages linking to other websites.

### **Changes to our Privacy Statement**

We keep our Privacy Notice under regular review. This privacy notice was last updated in March 2018.



## Main Contacts

Below are the Sheds main contacts for data protection in line with this policy. They should be your primary contact should you wish to discuss something related to data protection, or need further information.

Data Protection Officer (DPO): Allan Walker      DPO Tel: 07816 073166  
DPO Email: [chair@ccandfmensshed.org.uk](mailto:chair@ccandfmensshed.org.uk)

Data Protection Officer (DPO): Robert Norris      DPO Tel: 07747 094538  
DPO Email: [secretary@ccandfmensshed.org.uk](mailto:secretary@ccandfmensshed.org.uk)

Data Protection Officer (DPO): Malcolm Thompson      DPO Tel: 07899 920493  
DPO Email: [treasurer@ccandfmensshed.org.uk](mailto:treasurer@ccandfmensshed.org.uk)

Data Protection Officer (DPO): Carla Lacey      DPO Tel: 07725 599248  
DPO Email: [carla@ccandfmensshed.org.uk](mailto:carla@ccandfmensshed.org.uk)

The DPOs' are volunteers of the Data Controller, the Church Crookham and Fleet Mens Shed and have responsibility for ensuring personal data is collected and processed lawfully in line with this policy and the GDPR, and is kept secure.

## Definitions

This policy uses the GDPR's definitions for the following key terms.

**Personal data** – any information relating to an identified or identifiable natural person, both 'direct' and 'indirect' identification.

**Natural Person** - an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity.

**Data Controller** - a 'person' who determines the purposes for information processing and the manner in which it is done. A data controller will be a 'person' recognised by law i.e. individuals, organisation and corporate bodies.

**Data Processor** - any 'person' (again, a person as recognised by law), other than an employee of a data controller, who processes the data on behalf of the data controller.

Other key terms are defined within their sections.

## Data Collection

From time to time, we will need to process the following examples of personal data from volunteers, service users and other natural persons related to our work. We may also, at times, need to collect and process personal data not listed here. The following are some examples of the types of personal data we may collect and process.

- Name
- Contact information e.g. address, telephone numbers, email addresses
- Information about your age, medical conditions, disability status
- Information about your skills, qualifications, interests and expertise

We may use this information to:

- Manage memberships
- Understand the views and opinions of our Shedders



- Handle complaints
- Improve our services
- Carry out administration functions
- Get help if somebody is in danger e.g. contact next of kin if an accident or emergency occurs
- Comply with legal obligations

In line with the GDPR, Church Crookham and Fleet Mens Shed will ask for and record individuals' consent prior to collecting and processing data for certain purposes and provide clear and concise privacy notices to provide information on how and why we are collecting and processing particular data. Church Crookham and Fleet Mens Shed will ensure it provides ongoing opportunities to give or revoke consent where appropriate and necessary in line with the GDPR. Church Crookham and Fleet Mens Shed privacy notices will also state clearly our lawful basis or bases for collecting the data in each instance that we collect and process it. This will be in line with the six documented legal bases of the GDPR; consent, contract, legal obligation, vital interests, public tasks or legitimate interest.

Church Crookham and Fleet Mens Shed will maintain a live log of the exact types of data, reasons and lawful basis for collection and processing which allows us to demonstrate our compliance with the GDPR with the ICO, if ever necessary.

Church Crookham and Fleet Mens Shed will never, under any circumstances, use personal data to discriminate against a person for any reason.

Church Crookham and Fleet Mens Shed will audit personal data on file on an annual basis to ensure it is still relevant, needed and lawfully held. If ever we need to use data for another purpose, we will make sure we inform and/or request consent from the relevant persons, in line with the GDPR.

Church Crookham and Fleet Mens Shed will carry out a Data Protection Impact Assessment (DPIA) prior to implementing new data handling technology and/or where processing personal data is likely to significantly affect individuals.

### Data Handling

Church Crookham and Fleet Mens Shed understands its obligations under the GDPR, when collecting, controlling and managing personal data. We will ensure that we:

- process data lawfully, fairly and in a transparent manner.
- collect data only for specified, explicit and legitimate purposes and not further processing in a manner that is incompatible with those purposes.
- process data adequately, relevant and limited to only what is necessary.
- ensure personal data is accurate and kept up to date, rectifying and erasing any errors or inaccuracies without delay.
- will keep personal data in a form that permits identification of individuals for no longer than is necessary for the purpose.
- process personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing, and against loss, destruction or damage.

As a data controller and in line with the GDPR, we will keep a record of our processes, consistent with the above and be able to demonstrate our compliance at any given time.



### Data Storage and Security

Church Crookham and Fleet Mens Shed takes the matter of safety of personal data very seriously and will always ensure we put in place robust safety measures, appropriate to the type of information we hold and process.

In order to secure personal data kept by Church Crookham and Fleet Mens Shed we will use a mixture of the following methods, appropriate to the data held.

- Physical security including <good quality doors and locks, alarms, security lighting and CCTV>.
- Computer security including <passwords, encryption or two-factor authentication>.

We will check our storage and security practices regularly to ensure they are in line with regulation and appropriate for the personal data held. We will build a culture of awareness and security within the Shed ensuring good communication with key people, and we will only ever provide access to personal data for people that need it for lawful processing.

The exact way we store personal data for each purpose will be documented in our Data Protection Log.

### Individual Rights

Church Crookham and Fleet Mens Shed is aware of the rights for individuals whose personal data we hold. In line with those rights we will ensure we process data in accordance with these rights. We will:

- Be transparent and inform them of how and why we will process their personal data, as well as the lawful basis for doing so.
- Respond within 30 days if people ask to access their personal data, allowing them to verify its lawful collection and processing.
- Rectify any inaccurate or incomplete personal data without delay.
- Erase any personal data when it is no longer needed or there is no lawful reason for it being held.
- Take immediate action if an individual requests that we suppress the processing of their data or objects to its collection, retaining just enough to respect their wishes in future.
- Never process personal data for more than it's lawful, documented purpose(s).
- Obtain clear, active consent from each individual where we are lawfully obliged to do so.

### Data Breaches

Church Crookham and Fleet Mens Shed recognises the GDPR's guidelines to record, rectify and report, where necessary, data breaches; where a breach of security leads to the destruction, loss, alteration or unauthorised disclosure of, or access to, personal data.

Church Crookham and Fleet Mens Shed DPOs are allocated the responsibility for minimising the likelihood of breaches and taking prompt action if ever they happen. Church Crookham and Fleet Mens Shed will ensure it notifies the individuals whose data is involved if there is any adverse risk to them as a result of the breach, and where necessary notify the Information Commissioner's Office (ICO).



### Accessing Information

Under the GDPR, individuals have the right to access the information held about them. If you would like to request information held, or be reminded of the reasons, lawful basis and methods of keeping your personal data, please send a request in writing to:

FAO

Mr Robert Norris

Church Crookham and Fleet Mens Shed

c/o Church Crookham Parish Council

Church Crookham Community Centre

Boyce Road

Church Crookham

GU52 8AQ

We will respond to all requests within 30 days.

### The Information Commissioner's Office (ICO)

The ICO is "the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals" (ICO website). It is responsible for administering the provisions of the GDPR. Under the GDPR, organisations must register with the ICO unless exempt.

Church Crookham and Fleet Mens Shed is exempt from registering with the ICO because it is a non-profit making organisation / only makes a profit only for its own purposes.

Church Crookham and Fleet Mens Shed only:

- processes information necessary to establish or maintain membership or support.
- processes information necessary to provide or administer activities for people who are members of the organisation or have regular contact with it.
- Never shares the information with people and organisations necessary to carry out the organisation's activities unless given permission otherwise.
- keeps the information while the individual is a member or supporter or as long as necessary for member/supporter administration.

A handwritten signature in blue ink, appearing to read "Allan Walker", with a long horizontal line extending to the right.

*Data Protection Policy Adopted 7<sup>th</sup> March 2018. Review Date March 2019*

*Allan Walker*

*Chairman*