

ACTION AGAINST DESTRUCTIVE DEVELOPMENT EASTLEIGH

Data Protection Policy

Policy prepared by: Deborah Mitchell
Approved by the ADD Committee on 19/06/2018
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Introduction

In order to operate, Action against Destructive Development (ADD) needs to gather, store and use certain forms of information about individuals, including supporters, volunteers, contractors, other campaigning bodies, business contacts and any other people the group has a relationship with or regularly needs to contact.

This policy explains how this data should be collected, stored and used in order to meet ADD's data protection standards and comply with the General Data Protection Regulations (GDPR). This purpose of this policy is to ensure that ADD:

- Protects the rights of our supporters and volunteers
- Complies with data protection law
- Follows good practice
- Protects itself and its contacts from the risks of a data breach

This policy applies to those handling data on behalf of ADD, including:

- Members of ADD's Committee
- Volunteers
- Contractors

It applies to all data that ADD holds relating to individuals, including:

- Names
- Email addresses
- Postal addresses
- Phone numbers
- Any other personal information held, including financial details

Roles and responsibilities

ADD is the Data Controller and will determine what data is collected and how it is used. The person with responsibility for data protection at ADD is Deborah Mitchell. Together with the ADD Committee, she is tasked with the secure, fair and transparent collection and use of data by ADD. Everyone who has access to data as part of ADD is responsible for ensuring that they adhere to this policy.

Any questions relating to the collection or use of data should be directed to support@add-eastleigh.org.

ADD uses third-party Data Processors (MailChimp and Google Drive) to process data on its behalf. ADD will ensure all Data Processors are compliant with GDPR.

Adherence to the principles of data protection

Personal data is processed in a fair, lawful and transparent manner

ADD will collect data in a lawful manner, and only where necessary for the legitimate purposes of the group.

- The name and contact details of volunteers will be collected when they take up a position on the Committee or within one of the Committee's subgroups, and will be used to contact them regarding group administration related to their role.

Further information, including personal financial information may also be collected in specific circumstances where lawful and necessary (in order to process payment or reimbursement, for example).

Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to ADD's completing tasks expected as part of working with the individuals).

- The name and contact details of contractors will be collected when they undertake work on behalf of ADD, and will be used to contact them regarding group administration related to their role.

Further information, including personal financial information may also be collected in specific circumstances where lawful and necessary (in order to process payment or reimbursement, for example).

Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to ADD's completing tasks expected as part of working with the individuals).

- An individual's name and contact details may, if appropriate, be collected when they reserve a place for an event. This will be used to contact them about their booking and to allow them entry to the event.

Lawful basis for processing this data: Contract (the collection and use of data is fair and reasonable in relation to ADD's completing tasks expected as part of the booking).

- An individual's name, contact details and other details may be collected at any time (including when reserving a place for an event, or at an event), with their consent, in order for ADD to communicate with them about the campaign. See 'Consent' below.

Lawful basis for processing this data: Consent (see 'Consent', below)

- Pseudonymised or anonymised data (including behavioural, technological and geographical/regional) on an individual may be collected via tracking 'cookies' when they access the ADD website or interact with our emails, in order for us to monitor and improve our effectiveness on these channels. See 'Cookies on the ADD website' below.

Lawful basis for processing this data: Consent (see 'Consent', below)

Personal data are collected for specific, explicit and legitimate purposes and is used for those specified purposes alone.

When collecting data, ADD will always provide a clear and specific privacy statement explaining why the data are required and the purpose for which they will be used.

Any personal data that ADD collects is relevant and is no more than the minimum necessary for the purpose

ADD will not collect or store more data than the minimum information required for its intended purpose. For example, we will collect email addresses from supporters so that we can contact them with campaign updates, but data on their marital status or occupation will not be collected, since these are unnecessary and excessive for the purpose of sharing campaign updates.

Data are accurate and up-to-date

ADD will ask volunteers and supporters to check and update their data on an annual basis. Any individual

will be able to update their data at any point by contacting ADD's contact with responsibility for data protection, Deborah Mitchell (support@add-eastleigh.org)

Data are kept no longer than is necessary

ADD will keep records for no longer than is necessary in order to meet the intended use for which they were collected (unless there is a legal requirement to keep records). The storage and intended use of data will be reviewed in line with ADD's data retention policy. When the intended use no longer applies (e.g., contact details for a Committee volunteer who has left the campaign), the data will be deleted within a reasonable period.

Personal data are held securely

ADD will ensure that data held by us are kept secure. For example:

- Electronically-held data will be held within a password-protected and secure environment.
- Passwords for electronic data files will be reset whenever any individual with data access leaves their role.
- Physically held data (e.g., email sign-up sheets) will be stored in a locked file or cupboard.
- Access to data will be given to Committee members who have a requirement for access to such data, necessary for the purpose for which it is held. Deborah Mitchell will decide in which situations this is applicable and will keep a master list of who has access to which data.

Transfer of data to countries outside the EEA

ADD will not transfer data to countries outside the European Economic Area (EEA), unless the country has adequate protection for the individual's data privacy rights.

The rights of the individual

When ADD collects, retains and uses an individual's personal data, that individual has the following the rights over those data. (ADD will ensure its data processes comply with these rights and will make all reasonable efforts to fulfil requests from an individual in relation to these rights.)

- Right to be informed: whenever ADD collects data it will provide a clear and specific privacy statement explaining why they are being collected and how they will be used.
- Right of access: an individual may request to see the data that ADD holds on them and confirmation of how the data are being used. Requests should be made in writing to support@add-eastleigh.org and will be complied with free of charge and within one month. Where requests are complex or numerous this may be extended to two months.
- Right to rectification: an individual may request that their data be updated where it is inaccurate or incomplete. ADD will request that volunteers, supporters and contractors check and update their data on an annual basis. Any requests for data to be updated will be processed within one month.
- Right to object: an individual may object to their data being used for a particular purpose. ADD will always provide a way for an individual to withdraw consent in all ADD update emails. Where we receive a request to stop using data we will comply unless we have a lawful reason to use the data for legitimate interests or contractual obligation.
- Right to erasure: an individual may request for all data held on them to be deleted. ADD's data retention policy will ensure that data are held for no longer than is reasonably necessary in relation to the purpose for which they were originally collected. If a request for deletion is made, we will comply with the request unless:
 - There is a lawful reason to keep and use the data for legitimate interests or contractual obligation.
 - There is a legal requirement to keep the data.
- Right to restrict processing: an individual may request that their personal data be restricted – i.e., retained and stored, but not processed further. (For example, if an individual has contested the accuracy of the data held for them, ADD will restrict the data pending resolution.)

Although it is unlikely to apply to the data processed by ADD, we will also ensure that rights related to portability and automated decision-making (including profiling) are complied with, where appropriate.

Consent

ADD will not share volunteers' or supporters' data with other volunteers or supporters without the subject's prior consent.

ADD will collect data from consenting supporters for the purpose of ADD email updates. Whenever data is collected for this purpose, we will provide:

- A method for users to show their positive and active consent to receive these communications (e.g., a 'tick box')
- A clear and specific explanation of what the data will be used for (e.g. 'Tick this box if you would like ADD to send you email updates about the campaign and opportunities to get involved')

The data collected will only ever be used in the way described and consented to (i.e., we will not use email data in order to market third-party products).

Every ADD update email will contain a method by which a recipient can withdraw their consent (i.e., an 'unsubscribe' link). Opt-out requests such as this will be processed within 14 days.

Data Retention policy

Introduction

This policy forms part of ADD's Data Protection policy. It sets out how ADD will approach data retention, and establishes processes to ensure we do not hold data for longer than is necessary.

Roles and responsibilities

ADD is the Data Controller and will determine what data is collected and retained, and how it is used. The person with responsibility for data protection at ADD is Deborah Mitchell. Together with the ADD Committee, she is tasked with the secure and fair retention and use of data by ADD. Any questions relating to data retention or use of data should be directed to support@add-eastleigh.org.

Data reviews

There will be a regular review of all data to establish whether ADD still has good reason to keep and use the data held at the time of the review. As a general rule, a data review will be held every two years, and no more than 27 calendar months after the last review. The first review will take place on 19/06/2020.

Data to be reviewed

- Data on digital documents (e.g. spreadsheets) stored on personal devices held by committee members
- Data stored on third-party online services (e.g., MailChimp; Google Drive)
- Physical data stored at the homes of committee members

Who will conduct the review

The review will be conducted by Deborah Mitchell, with other committee members (to be decided on at the time of the review).

How data will be deleted

- Physical data will be destroyed safely and securely, including shredding.
- All reasonable and practical efforts will be made to remove data stored digitally.

- Priority will be given to any instances where data is stored in active lists (e.g., where it could be used) and to sensitive data.
- Where deleting the data would mean deleting other data that we have a valid lawful reason to keep (e.g. on old emails), the data may be retained safely and securely but not used.

Criteria

The following criteria will be used to make a decision about what data to keep and what to delete.

| Question | Action | |
|--|--|---|
| | Yes | No |
| Are the data stored securely? | No action required | Update storage protocol in line with Data Protection policy |
| Does the original reason for having the data still apply? | Continue to use | Delete or remove data |
| Are the data being used as originally intended? | Continue to use | Either delete/remove or record lawful basis for use and obtain consent if necessary |
| Is there a statutory requirement to keep the data? | Retain the data at least until the statutory minimum no longer applies | Delete or remove the data unless we have reason to retain the data under other criteria |
| Are the data accurate? | Continue to use | Ask the subject to confirm/update details |
| Where appropriate, do we have consent to use the data? (This consent might be implied by previous use and engagement by the individual.) | Continue to use | Obtain consent |
| Can the data be anonymised? | Anonymise data | Continue to use |

Statutory Requirements

Data stored by ADD may be retained, based on statutory requirements for storing data, other than data protection regulations. Such data might include but are not limited to:

- Details of payments made and received (e.g. in bank statements and accounting records)
- Committee meeting minutes
- Contracts and agreements with contractors

Volunteer data

- When a volunteer leaves ADD and all administrative tasks relating to their membership have been completed, any potentially sensitive data held on them will be deleted (for example, bank details).
- Unless consent has been given, their data will be removed from all email mailing lists.
- All other data will be stored safely and securely and reviewed as part of the next two-year review.

Mailing list data

- If an individual opts out of a mailing list, their data in the mailing list will be removed as soon as is practically possible.

- Any other data relating to the individual will be stored safely and securely and reviewed as part of the next two-year review.

Contractor data

- When a contractor stops working with ADD and all administrative tasks relating to their work have been completed, any potentially sensitive data held on them will be deleted (for example, bank details).
- Unless consent has been given, data will be removed from all email mailing lists.
- Any other data relating to the individual will be stored safely and securely and reviewed as part of the next two-year review

Other data

All other data will be included in a regular two-year review.