

## **RICHMOND EAL FRIENDSHIP GROUP CONFIDENTIALITY AND DATA PROTECTION**

### **Our aim**

The Richmond EAL Friendship Group takes your privacy seriously and is committed to protecting your personal information as required under the General Data Protection Regulations (GDPR) 2018 and the Data Protection Act (DPA) 2018. The legislation requires organisations to protect and respect the rights and privacy of information held on individuals, whether electronically or in print copy. For us, this applies to information held on our service users, supporters, employees and volunteers.

### **Our policy**

Our policy is designed to:

- Identify what information should be kept by whom and for how long.
- Ensure that only the minimum data is collected and held necessary for the purpose for which it was collected.
- Ensure that those individuals who keep records are clear about how to do this securely; also that they know their legal responsibilities.
- Ensure that everyone knows how they can access information held on them.

### **Scope**

This policy applies to data held on our service users, supporters, employees and volunteers.

### **Responsibility**

The Chief Executive is responsible for personal information held as well as ensuring that everyone understands what personal information is held, what it is used for, that only data relevant for our charitable work is kept and that consent is obtained.

### **Legal Requirements**

Any individual on whom information is held has the right to:

- be informed of the information held on them (to enable fair processing procedures)
- access to this information if requested (called a 'subject access request')
- have the information corrected if the information held is incorrect
- having the information removed unless there is a legal reason for holding or retaining the data
- restricting the processing of their information in some instances
- asking for information to be transferred (called data portability) to another IT environment in a safe and secure way and objecting to the information being held (if consent has been not obtained).

## Implementation

### What is your personal data used for?

Personal information is held both manually and electronically to:

- Enable us to carry out our aims as a charity for the benefit of the public
- Support individual service users
- Promote the interests of the charity
- Manage our volunteers and employees
- Maintain accounts and records
- Carry out our legal requirements as a charity

We will not share your contact details with any other organisation unless we have your permission, or under special circumstances, such as when we believe the law requires it.

### Data recording

Personal information is classified as 'sensitive-\*' and 'non-sensitive' and protected against unauthorised access or processing; it is a requirement that it is accurate, up to date, not kept longer than necessary and only contains factual information. Particularly, before any sensitive data is obtained, written consent must be obtained and an individual informed of their rights. Examples of personal information include your name, postal address, phone number and email address.

\*Sensitive personal data includes information on race; ethnic origin; politics; religion; trade union membership; genetics; biometrics (where used for ID purposes); health; sex life; or sexual orientation.

Records can be held either electronically or manually or in both forms.

We will store and process personal data on devices in the UK. We may contract with the following third parties for hosting and data storage purposes:

- Apple (<https://www.apple.com/uk/privacy>)
- Charities Aid Foundation (<https://www.cafonline.org/privacy/>)
- FreeAgent (<https://www.freeagent.com/privacy/>)
- Google (<https://policies.google.com/privacy?hl=en-GB>)
- Microsoft (<https://www.microsoft.com/en-gb/privacy/privacystatement>)
- NatWest (<https://www.natwest.com/privacy-policy.html>)
- Voice Online Communities (<https://e-voice.org.uk/privacy>)

We may also share anonymised data with public bodies, such as government departments, colleges and universities, for research purposes to improve our services. If you wish to opt out, please contact us.

### Updating or deleting your data/Unsubscribing

You can ask us to update or delete any personal information that we hold and/or stop sending you any type of information at any time by emailing the Chief Executive. ([ceo@richmondeal.org.uk](mailto:ceo@richmondeal.org.uk)).

## **Accuracy**

The accuracy of your information is important to us. If you change email address or if any of the other information we hold is inaccurate or out of date, please contact us. Any information that we hold that is incorrect will be amended or deleted promptly.

## **Access to your personal information**

You have the right to request details of personal information that we hold about you from us. You can make such a request by email. We will take steps to confirm your identity before releasing any information to you. We will respond to your request within 10 working days, unless there are exceptional circumstances.

## **Security**

We place great importance on the security of your personal information and we shall always try to take appropriate precautions to protect it. All electronic information is stored securely in password protected spreadsheets/documents on a computer. All paper-based information is stored securely.

All Trustees and volunteers who handle personal information are kept up-to-date on our security and privacy practices. If you wish us to stop communicating with you, please simply email the Chief Executive.

Please note that any breach of the Data Protection legislation, whether deliberate or through negligence, may lead to disciplinary action being taken.

## **Data subject rights**

All individuals have data subject information rights which include:

- The right to be informed about the processing activities. We will endeavour where we are obliged to do so, to inform you of our intended processing activities that concern your personal data, except where we have a legal obligation to process your data
- The right to access your personal data in certain circumstances. All requests to access data will be dealt with in accordance with the Information Commissioner's Office (ICO) guidance.
- The right to ask us to rectify your personal data if you think it is inaccurate or incomplete.
- The right to object to the processing of your data e.g. in certain circumstances you may ask us to restrict the processing of your data, for example if you believe there is an inaccuracy.
- The right to ask us to transfer your data to yourself or another organisation in a portable format.
- The right to question solely automated decisions made about you although KVA does not currently undertake such processing.
- The right to ask us to erase your personal data. We may not be able to erase certain categories of data processed where we have a legal obligation and if we delete your personal data we may no longer be able to provide you with our services.

## How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at:

Richmond EAL Friendship Group  
12 Vivienne Close  
Twickenham  
TW1 2JX

You can also complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data.

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113  
ICO website: <https://ico.org.uk/make-a-complaint>