

23/5/2018	<b>FEASTA: The Foundation For The Economics Of Sustainability</b>
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## Definitions

<b>Charity</b>	Registered Charity [No. CHY13052]
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	Data Protection Officer: Anne B. Ryan
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the Charity.

### 1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

1. processed lawfully, fairly and in a transparent manner in relation to individuals;
2. 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;
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. 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;
5. 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

6. 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**

1. This policy applies to all personal data processed by the Charity.
2. The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
3. This policy shall be reviewed at least annually.

## **3. Lawful, fair and transparent processing**

1. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
2. The Register of Systems shall be reviewed at least annually.
3. 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**

1. The legal basis the charity uses for processing all data shall be that of consent. This is recorded in the Charity’s Register of Systems.
2. Evidence of opt-in consent shall be kept with the personal data.
3. Communications are sent to individuals based on their consent. Consent can be revoked at any time and this is stated in the Charity’s Register of Systems.

## **5. Data minimisation**

- a. The Charity only processes information necessary to establish or maintain membership or support or administer activities for people who are members of the organisation or have regular contact with it;
- b. The Charity only shares the information with people and organisations necessary to carry out the organisation’s activities and only keeps the information while the individual is a member or supporter or as long as necessary for member/supporter administration
- c. 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.

Data shall be kept for the purposes of conveying information to supporters and donors about projects supported by the Charity.

## **6. Accuracy**

1. The Charity shall take reasonable steps to ensure personal data is accurate.
2. 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.
3. The accuracy of personal data shall be reviewed annually with those whose data is held.

## **7. Archiving / removal**

1. To ensure that personal data is kept for no longer than necessary, the Charity has put in place an archiving policy for each area in which personal data is processed. This will be reviewed annually.

## **8. Security**

1. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
2. Access to personal data shall be limited to personnel who need access and appropriate security is in place to avoid unauthorised sharing of information.
3. When personal data is deleted this will be done safely such that the data is irrecoverable.

## **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.

END OF POLICY