**Data Protection Policy – GDP****R**

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| **GDPR** | means the General Data Protection Regulation. |
| **Responsible Person** | means the Trustee who acts as the Charity’s Data Protection Officer – i.e. the Chair  |

### 1. Data protection principles

Slough Happiness Collective is committed to processing data in accordance with its responsibilities under the GDPR. If a volunteer has any concerns in relation to this policy they should speak to a Trustee.

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

* + processed lawfully, fairly and in a transparent manner in relation to individuals;
	+ collected for specified, explicit and legitimate purposes
	+ adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
	+ accurate and, where necessary, kept up to date;
	+ kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed;
	+ 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**

2.1. This policy applies to all personal data processed by the Charity and to all volunteers.

### 3. Lawful, fair and transparent processing

3.1. Individuals have the right to request access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

### 4. Data minimisation

4.1. Sensitive data (defined by the Data Protection Act 2018 as information about racial or ethnic origin, political opinions, religious beliefs, trade union membership, physical or mental health, sexual life, criminal records or proceedings relating to an individual’s offences) where collected by the Charity will not be kept with a person’s records but will be kept separately and securely.

### 5. Accuracy

### 5.1. The Charity shall put in place reasonable steps to ensure personal data that is being processed for the lawful basis, which it was collected for by the Charity is kept accurate and up to date.

5.2. Individuals (Data subjects) have the right to ask for their personal information to be corrected if it is inaccurate or incomplete.

In addition to this individuals may also:

* object to the Processing of their Personal data
* lodge a complaint with the Data Protection Authority (ICO)
* request erasure of their Personal data
* request restriction of Processing of their personal data.

**6. 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 and if appropriate report this breach to the

ICO ([more information on the ICO website](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/personal-data-breaches/)). If volunteers have any concerns about this speak to a Trustee.

**7. SHC Subject Data Access Requests**

All individuals who are subjects of personal data held by SHC, including volunteers, are entitled to request access to that data at any time, this request should be made in writing. A charge may be made for an information request subject to a maximum laid down in law.

If volunteers have any concerns about this speak to a Trustee.

**Policy Review**

This policy will be reviewed regularly to reflect best practice in response to changes in relevant legislation or an identified failing in the policy’s effectiveness.

SHC Version 1.1, August 2019 - Date last Reviewed August 2019 – Next review date August 2020