

# Sustainable Cottenham Data Protection Policy

Agreed 12/12/19



## 1. Introduction

Sustainable Cottenham (SusCott) needs to collect and use information about individuals whom it comes into contact with, in order to carry on its work.

This personal information will be collected and dealt with appropriately, whether it is collected on paper, stored in a computer database, or recorded on other material.

To this end, SusCott will adhere to the General Data Protection Regulation 2018, and specifically, its 6 Principles of:

- (a) lawfulness, fairness and transparency
- (b) purpose limitation
- (c) data minimization
- (d) accuracy
- (e) storage limitation
- (f) integrity and confidentiality

## 2. Data Controller

**Sustainable Cottenham** is the " Controller" under the terms of the Regulation

It has determined that it will only hold and use personal information for the **purposes** of:

1. establishing or maintaining involvement with SusCott, or support for it
2. providing or administering SusCott activities

## 3. Disclosure

Disclosures of personal data held by SusCott are restricted to those third parties that are necessary for the purposes in (2), other than those made with the informed consent of the data subject. Individuals will be made aware in all circumstances how and with whom their information will be shared.

## 4. Data collection

SusCott will only collect data for the purposes in (2) and will observe fully conditions regarding the fair collection and use of information.

When collecting data about individuals, SusCott will check that they:

- 1) clearly understand why the information is needed
- 2) understand what it will be used for and what the consequences are should they decide not to give consent to processing
- 3) grant explicit consent in writing for data to be processed

## 5. Data Storage

Information and records will be stored securely and will only be accessible to SusCott Officers or members authorised by Officers.

Information will be stored for only as long as it is needed and will be disposed of appropriately: It will not be kept after the relationship between SusCott and the data subject ends, unless (and for so long as) it is necessary to do so for the purposes in (2).

It is SusCott's responsibility to check that all personal data is non-recoverable from any computer system previously used within the organisation, which is passed on/sold to a third party.

## 6. Data access and accuracy

All individuals have the right to access information SusCott holds about them.

SusCott will provide appropriate management and procedures:

- 1) so that people about whom information is held can:
  - a) access their personal information
  - b) correct, rectify, block or erase any information about themselves
- 2) so as to respond to those requests promptly and courteously.
- 3) to check the quality of information used and take steps to keep it up-to-date by asking data subjects whether there have been any changes
- 4) to take appropriate technical and organisational security measures to safeguard personal information

## 7. Operation

SusCott will::

- 1) have a Data Protection Officer with specific responsibility for checking compliance with this Data Protection Policy and related procedures.
- 2) inform everyone processing personal information that they are responsible for following this policy
- 3) annually review the ways it holds, manages and uses personal information

This policy will be updated as necessary to:

- 4) reflect best practice
- 5) comply with any amendments to the GDPR 2018
- 6) reflect relevant changes in SusCott's operations.

In case of any queries or questions in relation to this policy please contact the SusCott Data Protection Officer: **Christine Ward** [chris@sustainablecottenham.org.uk](mailto:chris@sustainablecottenham.org.uk)

Signed  Position CHAIR Date 12/12/19

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