

Exeter City of Sanctuary - Data Protection Policy

This policy applies to Exeter City of Sanctuary, ExCoS

ExCos will work in compliance with the principles of the GDPR:

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless –
 - (a) at least one of the conditions in Schedule 2 is met, and
 - (b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data

Responsibility

The named individual with responsibility for GDPR compliance is the Exeter City of Sanctuary Secretary currently Wendy Milne

Personal Data

The types of personal data ExCoS processes are

- 1) Supporters names and email addresses to keep them informed of ExCoS activities
- 2) Volunteer application forms (which include name, address, email address and 'phone number) and confidential references (which include name and email address of referee) to assess the application and maintain contact during period when a volunteer
- 3) Photographs taken a ExCoS events for use in reports, newsletters and on social media

ExCoS does not process sensitive personal data.

The relevant legal basis relied upon to process personal data.

- 1) Supporters names and email addresses – consent (i) via email opt-in (ii) from sign-up sheet
- 2) Volunteers data – necessary for assessing and managing volunteering
- 3) Photographs – consent (i) by completion of consent form (ii) attendance at an event where prior notification has been given that photographs will be taken.

3. How personal data is collected, used and deleted by ExCoS.

- 1) Supporters names and email addresses
 - a. collected from sign-up sheets with consent or from emails possibly submitted from website
 - b. used to send information on ExCoS activities and to request assistance with ExCoS activities
 - c. deleted at request of individual
- 2) Volunteers data

- a. collected from application form and email references
 - b. used to assess application and for contact during period of volunteering
 - c. deleted if application is unsuccessful or when period of volunteering ceases
- 3) Photographs
- a. taken during ExCoS events or ExCoS participation in public events
 - b. used to record and publicise ExCoS activities via emails, newsletters and social media
 - c. deleted after five years if not used

Storage and Security - Risks

Privacy and related risks

- 1) Supporters names and email addresses are held on-line in a web-accessed email account
 - a. inadvertent sharing while email
 - b. hacking of email account
- 2) Volunteers data are held as paper and electronic copies by the relevant members of the Management Committee
 - a. loss of paper copy
 - b. unauthorised access to electronic copy
 - c. loss of electronic copy
- 3) Photographs are held by the ExCoS photographer
 - a. unauthorised access

Solutions and precautionary actions to minimise risks

- 1) Supporters names and email addresses
 - a. ensure use Bcc when emailing
 - b. good password security
- 2) Volunteers data
 - a. paper copies kept securely at home
 - b. emails used to collect information deleted as soon as possible
 - c. electronic copies kept on password protected personal computer with files regularly backed up
- 3) Photographs
 - a. download and delete from camera as soon as practical
 - b. kept on password-protected personal computer

Access to data

Individuals have the right to request information ExCos holds on them. There will not be a charge for this and ExCoS will comply within one month. Contact: info@exeter.cityofsanctuary.org