



BRENT ISLAND TRUST (BIT) - **DATA PROTECTION POLICY**



Lawful Basis for Processing Personal Data

Data is held on the grounds of “legitimate interests”.

Legitimate Interests Assessment

Purpose Test

BIT holds personal data of its members for the purpose of:

- Keeping its members informed of the work of the Trust.
- Initiating and renewing membership subscriptions.
- Claiming gift aid from HMRC as appropriate.

Necessity Test

We consider it reasonable and necessary to store and process members’ personal data in order to achieve the purposes listed.

There is no less intrusive method to achieve the same result.

Balancing Test

We consider that our members would reasonably expect BIT to store and process their data for the purposes stated and that it will have minimal impact on their privacy. In this case we consider that the individual’s interest does not override BIT’s legitimate interests.

Data Held

The following data is held for Members of BIT:

- Name(s) and Address
- Telephone Number(s)
- e-mail address(es)

Data Storage

Data will be stored:

- As hard copies by the Membership Secretary.
- On the Membership Secretary’s computer and the computers of other members of BIT committee.

Security

Hard copies of data will be stored in a locked filing cabinet.

Digital data will be held on computers which are password protected and have been updated with the latest security software.

Newsletters and other circulars sent by e-mail will be addressed using Bcc.

Data Use

Data held will only be made available to members of BIT committee.

It will only be used to conduct the affairs of BIT. e.g Contacting members, Distributing newsletters etc

It will not be made available to any third party, with the exception of HMRC for the purpose of claiming Gift Aid.

Any change of use must be communicated and approved prior to the change.

Communicating Privacy Information

A privacy notice (*see below*) will be included with the membership form to inform members what data is held, how it is stored and used and who to contact to access, rectify or erase their data.

Members’ Rights

Members have the following rights:

- To know what data is held and how it is to be used.
- To have access to, rectify or erase their data.

Members' Requests

Requests by members to access, rectify or erase their data should be made to the Membership Secretary. Such requests must be dealt with within 30 days of the request, but will normally be dealt with as soon as possible.

Data Protection Officer (DPO)

The Data Protection Officer will be the Membership Secretary or another nominated officer.

Data Breaches

All data breaches should be reported to the Chairman and the DPO without delay.

Any breach will normally be reported to the members concerned.

Serious breaches may need to be reported to the Information Commissioner's Office (ICO)

Children

The data of Junior Members will only be held with the written consent of their parent or guardian.

PRIVACY NOTICE - *Please read and retain this for your information.*

Brent Island Trust holds your data to pursue our 'legitimate interests' in providing you with information on the work of the Trust, collecting subscriptions and claiming gift aid.

We keep details of your name(s), address, telephone number(s) and e-mail address(es) as provided by you on your membership form.

These details are kept securely by the Membership Secretary both as hard copies and on his/her computer. They may also be held by other members of the committee.

Your details will only be used for conducting the affairs of Brent Island Trust.

They will not be communicated to any third party without your permission, except for the purpose of claiming Gift Aid from HMRC.

You should contact the Membership Secretary if you wish to access, rectify or erase the details we hold, or have any queries concerning Data Protection.

Your details will be deleted within one year of you ceasing to be a member of the Trust.

For further information on the new rules concerning Data Protection please refer to the Information Commissioner's Office website at <https://ico.org.uk/>