

STEYNING DOWNLAND SCHEME

Data Protection Policy

Introduction

Please note that this policy has been produced to ensure compliance with the General Data Protection Regulation, which came in to force in May 2018. Revisions to this document may be made from time to time, without notice.

1. Personal Data Records

1.1. The Steyning Downland Scheme (SDS) holds data on the following people ('Data Subjects'):

- People who carry out paid work for us;
- people who volunteer with us;
- contractors who do work for us;
- Friends of the SDS and
- people who opt to receive our electronic newsletter.

We use this information to communicate with these groups of people and to meet our obligations under health and safety legislation.

1.2. In the case of paid workers, volunteers and contractors, the data we hold normally comprises their name, address, email address, telephone numbers and a record of the way(s) in which they have worked with the SDS. We may also retain certain historical records, for example the following:

- Birthdays;

- Previous work experience;
- Information arising from insurance, accident, safeguarding and health and safety issues.

1.3. In the case of the Friends of the SDS, the data we hold comprises their name, address, email address, telephone numbers and a record of the donations they are making to the SDS.

1.4. In the case of people who opt to receive our electronic newsletter, the data we hold comprises their name and email address.

1.5. By giving their contact details to the SDS, people give consent for the SDS to use their personal data so that we can contact them about SDS activities.

1.6. Once a person no longer has contact with the SDS, their personal information is deleted from the SDS databases.

2. Marketing

2.1. The SDS will not supply any data held about its members to external organisations or individuals for marketing purposes. It may cascade marketing material to members, in so far as it may inform members of external events, trips, training events and speakers organised by other groups which may be of interest to them.

3. Archived Data

3.1. In addition to the information listed in Section 1, the SDS will retain the following historical records:

- Trustee and Steering Group minutes and reports
- Annual Reports
- Events Calendars
- Photographs of events

4. Security

4.1. Records and historical data will be retained on the two SDS computer hard drives and on a server maintained by the Wiston Estate, access to which is encrypted. Additionally, names and e-mail addresses are stored in a password secure, online MailChimp account only accessible to the Project Manager and Volunteer Administrator. Personal information will be supplied to third parties only with the consent of the person to which the data relates, or if required by law.

5. Right of Data Subjects to Choose

5.1. Any Data Subject has the right to have their data erased or updated. To implement this right, a person who believes that their personal data is being held by the SDS should e-mail us at: SDS@wistonestate.co.uk. Data Subjects can ask for a copy of their data and can request that all their records are either deleted or updated. The SDS will make the requested changes within five working days of the e-mail being opened.

6. Data Controller

6.1. The Project Manager is the Data Controller for the SDS. He/she bears direct responsibility for ensuring compliance with the Data Protection Act and regulations. He/she will answer questions about their data and how it is protected.

6.2. People are entitled to request a copy of the data held about them on a computer by the SDS. The Data Controller will provide this information within 1 month of asking. If there are inaccuracies in the data the SDS holds, the Data Controller will make the necessary corrections at their request.

7. Complaining

7.1. If a person wishes to complain about the way their data is being managed, then they should first contact the Data Controller. If they are unhappy with the Data Controller's response, then they should contact the Chair of the Trustees. If they remain unhappy, then they should contact the Information Commissioners Office (See Appendix 1, below).

8. A Data Breach – Method of Reporting

8.1. If the SDS becomes aware that its computer systems have been subject to unauthorised access, it will inform members and the Information Commissioner's office within five working days of the breach being discovered.

9. Review

9.1. This policy will be reviewed periodically to take into account changes in the law and the experience of the policy in practice.

Appendix 1: Key Contact Information

1.1. SDS Data Controller: Matthew Thomas, Project Manager, Steyning Downland Scheme, Wiston Estate Office, Wiston Park, West Sussex, BN44 3DD. Tel: 01903 817996
Email: SDS@wistonestate.co.uk.

1.2. Chair of the Trustees: Richard Goring, Wiston Estate Office, Wiston Park, West Sussex, BN44 3DD. Tel: 01903 812129 Email: Richard@wistonestate.co.uk.

1.3. Information Commissioners Office: Use their DPA security breach helpline: 0303 123 1113 (open Monday to Friday, 9am to 5pm). Select telephone answering option 3 to speak to staff who will record the breach and give advice. Online information is available via the following ICO website links:

<https://ico.org.uk/concerns/>

<https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach/>