

Silver Salisbury Group

Data Processing and Protection Policy

1) Definitions

Personal data is information about a person which is identifiable as being about them. It can be stored electronically or on paper and includes images and audio recordings as well as written information.

Data protection is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, destroying or deleting personal data.

2) Responsibility

Overall and final responsibility for data protection lies with the trustees of Silver Salisbury, who are responsible for overseeing activities and ensuring this policy is upheld.

All volunteers and representatives are responsible for observing this policy, and related procedures, in all areas of their work for the group.

3) Overall Policy Statement

Silver Salisbury needs to keep personal data about its trustees, volunteers, supporters and beneficiaries of services in order to carry out community and group activities.

We will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people's privacy and comply with the General Data Protection Regulation (GDPR) and other relevant legislation.

We will only collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store or use data we do not need.

We will only collect, store and use data for:

- purposes for which the individual has given explicit consent, or
- purposes that are in our group's legitimate interests, or
- to comply with legal obligations, or
- to perform public tasks.

We will provide individuals with details of the data we have about them when requested by the relevant individual.

We will delete data if requested by the relevant individual, unless we need to keep it for legal reasons.

We will endeavour to keep personal data up-to-date and accurate.

We will store personal data securely.

We will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.

We will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so.

We will endeavour not to have data breaches. If we have a data breach, we will inform those that the data breach has affected, so that they are aware. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone's personal rights or freedoms will be reported to the Information Commissioner's Office within 72 hours, and to the individual concerned.

To uphold this policy, we will maintain a set of data protection procedures for our committee and volunteers to follow.

Data Protection Procedures

1) Introduction

Silver Salisbury has a data protection policy which is reviewed regularly. In order to help us uphold the policy, we have created the following procedures which outline ways in which we collect, store, use, amend, share, destroy and delete personal data.

These procedures cover the main, regular ways we collect and use personal data. We may from time to time collect and use data in ways not covered here. In these cases we will ensure our Data Protection Policy is upheld.

2) General procedures

Data will be stored securely. When it is stored electronically, it will be kept in password protected files. When it is stored online in a third party website (e.g. MS365) we will ensure the third party comply with the GDPR (eg Eventbrite policy in appendix 1) . Paper records will be stored securely for a maximum of 14 days before being destroyed securely.

When we no longer need data, or when someone has asked for their data to be deleted, it will be deleted securely. We will ensure that data is permanently deleted from computers, and that paper

data is shredded. Anonymised data will be kept to allow for analysis and to identify trends over time.

We will keep records of consent given for us to collect, use and store data. These records will be stored securely.

3) Mailing List

We will maintain a mailing list. This will include the names and contact details of people who wish to receive publicity, information about events and activities or fundraising appeals from Silver Salisbury.

When people sign up to the list we will explain how their details will be used, how they will be stored, and that they may ask to be removed from the list at any time. We will ask them to give separate consent to receive publicity and fundraising messages and will only send them messages which they have expressly consented to receive or we have a legitimate interest to send.

We will not use the mailing list in any way that the individuals on it have not explicitly consented to.

We will provide information about how to be removed from the list with every mailing.

We will use mailing list providers who store data within the UK.

4) Supporting Beneficiaries

From time to time, we may run projects requiring personal data to provide a service to individuals.

We will obtain explicit, signed consent to hold an individual's personal details.

We will request explicit, signed consent before sharing any personal details with any relevant third party.

We will not keep personal information for any longer than is necessary for the purpose of providing them with the service they have requested.

Personal data relating to our projects will be stored securely by designated members of the project team and not shared among the rest of the organisation or with other volunteers unless necessary for the purpose of providing the service requested.

5) Contacting Volunteers

Local people volunteer for Silver Salisbury in a number of ways.

We will maintain a list of contact details of our volunteers. We will share volunteering opportunities and requests for help with the people on this list.

People will be removed from the list if they have not volunteered for the group for 15 months, unless they have specifically asked to be kept on the group contact lists.

We will provide a privacy notice to volunteers which explains why we have their information, what we are using it for, how long we will keep it, and that they can ask to have it deleted or amended at any time by contacting us.

To allow volunteers to work together to organise for the group, it is sometimes necessary to share volunteer contact details with other volunteers. We will only do this with explicit consent.

Legal or Regulatory Matters: Data Protection Act 2018

Policy Owner: Data Protection Trustee

SSG Authorisation:

Date	Name	Approval	Position
2021	Alan Mitchel		Trustee with oversight of GDPR
Jan 2023	Alan Mitchel		Trustee with oversight of GDPR
June 2026	Jonathan Gapper	Trustees Meeting 30/07/26	Trustee with oversight of GDPR
July 2028			

Appendix 1 : Eventbrite Data Protection



Eventbrite & EU Data
Protection.pdf

Appendix 2: Breach register (to be used if breach reported)



Breach%20Register.xl
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