

Data Protection Policy

Queensferry Heritage Trust

Last updated	31 August 2018
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Definitions

Charity	means Queensferry Heritage Trust, a registered charity.
GDPR	means the General Data Protection Regulation as specified in the Global Data Protection Act 2018
Responsible Person	means the Chairperson of the Charity.

1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

2. General provisions

- This policy applies to all personal data processed by the Charity.
- The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- This policy shall be reviewed at least annually.

3. Lawful, fair and transparent processing

- The Charity shall maintain an electronic file of names, addresses and contact details of members and others involved in the work of the charity.
- Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.
- The Charity shall use personal data only for the purposes of contacting individuals for the legitimate operation of the charity.

4. Lawful purposes

- All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).

- b. The Charity deems that maintaining an electronic contact list is the only practical way of operating the charity and as such constitutes a legitimate interest.

5. Data minimisation

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- b. Personal data is limited to names, addresses and contact details only.

6. Accuracy

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. All efforts will be made to update the accuracy of data and security of the systems and shall be reviewed at least annually.

7. Security

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

8. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY