



**The Black Lion Community Group Limited (the “Group”)
Data Protection Policy**

1. Definitions

- a. 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.
- b. 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

- a. Overall and final responsibility for data protection lies with the management committee, who are responsible for overseeing activities and ensuring this policy is upheld.
- b. All employees and volunteers are responsible for observing this policy, and related procedures, in all areas of their work for the Group.

3. Overall policy statement

- a. The Group needs to keep personal data about its committee, members, employees, volunteers, supporters and suppliers in order to carry out Group activities.
- b. The Group 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.
- c. The Group 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.
- d. The Group will only collect, store and use data for:
 - purposes for which the individual has given explicit consent, or
 - purposes that are in the Group's legitimate interests, or
 - contracts with the individual whose data it is, or
 - to comply with legal obligations, or to protect someone's life, or
 - to perform public tasks.
- e. The Group will provide individuals with details of the data we have about them when requested by the relevant individual.
- f. The Group will delete data if requested by the relevant individual, unless we need to keep it for legal or regulatory reasons.
- g. The Group will endeavor to keep personal data up-to-date and accurate.
- h. The Group will store personal data securely.
- i. The Group will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.
- j. The Group will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so.
- k. The Group will endeavor not to have data breaches. In the event of a data breach, we will endeavor to rectify the breach by getting any lost or shared data back. The Group will evaluate its 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.
- l. To uphold this policy, the Group will maintain a set of data protection procedures for our committee and volunteers to follow.

4. Review

This policy will be reviewed as necessary, but at least every two years :

Date :

Signature (Chair)

Signature (Secretary)

**The Black Lion Community Group Limited (the “Group”)
Data protection procedures**

1. Introduction

- a. The Group has a data protection policy which is reviewed regularly. In order to help it uphold the policy, the Group have created the following procedures which outline ways in which it collects, stores, uses, amends, shares, destroys and deletes personal data.
- b. These procedures cover the main, regular ways the Group collect and use personal data. The Group may from time to time collect and use data in ways not covered here. In such cases the Group will ensure its Data Protection Policy is upheld.
- c. Having consulted the Information Commissioner's Office (ICO) website, the Group do not have to register as it meets the exemptions as only holding information to maintain membership and support, and any profits are for the Group's own purpose and not to enrich others.

2. General procedures

- a. 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 Google Drive) the Group will ensure the third-party complies with the GDPR. When it is stored on paper it will be filed carefully in a locked filing cabinet.
- b. When the Group no longer needs data, or when someone has asked for their data to be deleted, it will be deleted securely. The Group will ensure that data is permanently deleted from computers, and that paper data is shredded and/or burned.
- c. The Group will keep records of consent to collect, use and store data. These records will be stored securely.

3. Mailing list

- a. The Group may maintain a mailing list which will include the names and contact details of people who have indicated they want to receive information from the Group.
- b. When people sign up to the list the Group 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.
- c. The Group will not use the mailing list in any way that the individuals on it have not explicitly consented to and will not provide the list to third-parties other than as described in these procedures.
- d. The Group will provide information about how to be removed from the list with every mailing.

4. Contacting volunteers

- a. Local people volunteer for the Group in a number of ways.
- b. The Group will maintain a list of contact details of our recent volunteers. The Group will share volunteering opportunities and requests for help with the people on this list.
- c. People will be removed from the list if they have not volunteered for the group for 12 months.
- d. When contacting people on this list, the Group will provide information that their details can be deleted or amended at any time.
- e. To allow volunteers to work together to organise for the Group, it is sometimes necessary to share volunteer contact details with other volunteers.

5. Contacting committee members

- a. The committee need to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met.
- b. Committee contact details will be shared among the committee.
- c. Committee members will not share each other's contact details with anyone outside of the committee, or use them for anything other than Group business, without explicit consent.

6. Review

These procedures will be reviewed as necessary, but at least every two Years

Date :

Signature (Chair)

Signature (Secretary)