

streetkidsdirect.org.uk

General Data Protection Regulation Policy

Goal of our Data Protection Policy

The goal of our data protection policy is to depict the European legal data protection aspects in one document and clarify our position with regards to how we use the data we store on our supporters. Our policy can also be used as the basis for statutory data protection inspections, e.g. by the supporters who request information about their data. This is not only to ensure compliance with the European General Data Protection Regulation (GDPR) but also to provide proof of compliance.

Introduction

When you donate to Street Kids Direct or register to volunteer with Radio Christmas or when any information about a donor or volunteer is submitted to us some information about you will be held on computer and used in compliance with the GDPR.

With the rules around data protection and privacy that changed on 25th May 2018, the date on which the new EU General Data Protection Regulation (GDPR) came into force, we produced this document in order to clarify our position with regards to the donors' data that we hold and to ensure that our current practices are in line with this regulation.

GDPR Guidelines

Under the GDPR Guidelines Street Kids Direct is the data controller* of personal data provided by anyone donating to the charity or anyone volunteering for the charity and its partners.

Any of the partners that are recipients of funds from Street Kids Direct are classified as a third party**.

Security policy and responsibilities in the company

- The goal of our data protection policy is to ensure that all data we hold on our supporters is kept safely and securely and is never shared with third parties**, other charities and companies.
- Only two people currently have access to the data we store on donors and this is the charity's Director, Duncan Dyason and the charity's Financial Officer, Cat Dale.

- We are committed to the continuous improvement of our data protection management system and will always seek to comply with any UK regulation with regards to it.

Legal framework for the charity

- We will always comply with any directives from The Charity Commission for England and Wales and implement any new policies in order to keep our donors' information safe and secure.
- Street Kids Direct will always comply to UK and European laws with regards to data protection.

Existing technical and organisational measures

Street Kids Direct seeks the outside advice of an expert in data security. This person regularly checks our systems and helps us keep both our websites and data secure and assesses risks from external threats and hacks on a regular basis.

The areas we continually review include:

- Storage of all data
- Access control to that data
- Restriction of software installation and use
- Data backup and secure storage
- Information transfer
- Protection against malware
- Handling technical weak points
- Cryptographic measures
- Communication security
- Privacy and protection of personal information

Handling your information

When a donor subscribes to our newsletters we will only use their data for this purpose. We are committed to not selling or sharing donors' information with other charities, companies or third parties**.

Once we receive your subscription:

- The charity Director is informed
- Your name and email are kept in our online database
- A copy of that database is kept on a USB and then stored securely in a safe

- We will then only contact you with regards to queries about your donations or to inform you of the ongoing work of the charity.
- If you choose to be removed from our database then all information we hold on you is deleted from the database and from the Director and Financial Controller's computers.
- The two computers that hold your information are always kept in secure locations and are password protected.
- At any time, you can request a copy of the information we hold on you. Mostly this is only your full name and email address.
- Supporters are only required to select ONE OPTION when they sign up for our newsletter and not to opt in or out of sharing their information with a third party**.

For Volunteers

For all volunteers applying for work with either Street Kids Direct or one of our partners more information will be held by the charity and handled in the following manner:

1. The Coordinator of Volunteers will receive your application and any supplementary information.
2. The Coordinator of Volunteers will begin the application process and then share this information with the charity Director in order to move the application towards the interview stage or will either reject the application or pass the application to one of our partners with the permission of the applying volunteer.
3. Some information on the volunteer will then be kept on the computer of the Director of the project partner and maybe kept in paper form in a locked cabinet in the project's office.
4. When the volunteers complete their time of service with the charity or its partner then all information stored on that volunteer is destroyed 6 months later.

Policy Review

Street Kids Direct is committed to a robust system of data management and storage and continues to review its procedures and policies in order to keep all donors' information safe and secure.

This policy will be reviewed again in December 2018 or earlier should our independent security advisor request.

FAQs

General questions

I've never heard of GDPR. What is it?

"The General Data Protection Regulation is a new, European-wide law that replaces the Data Protection Act 1998 in the UK. It places greater obligations on how organisations handle personal data. It comes into effect on 25 May 2018." (Brexit does not change this)

What information does the GDPR apply to?

"The GDPR applies to 'personal data', which means any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier."

The above questions and more can be found on the ICO website <https://www.ico.org.uk/for-organisations/business/guide-to-the-general-data-protection-regulation-gdpr-faqs/>

More specific guidance for charities can be found at: <https://ico.org.uk/for-organisations/charity/>

What are my rights?

Where we rely on your consent to use your personal information, you have the right to withdraw that consent at any time. This includes the right to ask us to stop using your personal information for marketing purposes, or to unsubscribe from our email list at any time.

You also have the following rights:

Right of access: You can write to us to ask for confirmation of what personal information we hold on you and to request a copy of that personal information. Provided we are satisfied that you are entitled to see the personal information requested and we have successfully confirmed your identity, we will provide you with your personal information subject to any exemptions that apply.

Right of erasure: You can request that we delete your personal information from our records as far as we are required to do so.

Right of rectification: If you believe our records of your personal information are inaccurate, you have the right to ask for those records to be updated. You can also ask us to check the personal information we hold about you if you are unsure whether it is accurate.

Right to restrict processing: You have the right to ask for processing of your personal information to be restricted if there is disagreement about its accuracy or legitimate use.

Right to object: You have the right to object to processing where we are (i) processing your personal information on the basis of the legitimate interest basis (ii) using your information for statistical purposes.

Right to data portability: Where we are processing your personal information (that you have provided to us) either (i) by relying on your consent or (ii) because such processing is necessary for the performance of a contract to which you are party or to take steps at your request prior to entering in a contract, and in either case we are processing your personal

information using automated means (i.e. with no human involvement), you may ask us to provide the personal information to you – or another service provider – in a machine-readable format.

Rights related to automated decision-making: You have the right not to be subject to a decision based solely on automated processing of your personal information which produces legal or similarly significant effects on you, unless such a decision (i) is necessary to enter into/perform a contract between you and us/another organisation, (ii) is authorised by EU or Member State law to which Stewardship is subject (as long as that law offers you sufficient protection), or (iii) is based on your explicit consent.

Please note that some of these rights only apply in certain circumstances. At all times you have the right to make a complaint to the Information Commissioner's

Office www.ico.org.uk if you think that any of your rights have been infringed by us.

If you have any concerns or complaints about the way we use your personal information, please contact us using the details below.

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Definitions, Etc.

*Data controller – means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

**Third Party – means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

