

**One Voice (Immingham District) Ltd**

**Data Protection Policy**

**Incorporating the EU General Data Protection Regulations (GDPR) May 2019**

[1.0 Introduction 4](#_Toc12379395)

[2.0 The Regulation 4](#_Toc12379396)

[3.0 What information does the GDPR apply to? 4](#_Toc12379397)

[3.1 Personal data 4](#_Toc12379398)

[4.0 Definitions 5](#_Toc12379399)

[5.0 The Principles 6](#_Toc12379400)

[6.0 The rights of the Data Subject 7](#_Toc12379401)

[7.0 Responsibilities 9](#_Toc12379402)

[7.1 Data collection and processing 9](#_Toc12379403)

[7.2 Security 10](#_Toc12379404)

[7.4 Employee Recruitment 11](#_Toc12379405)

[7.6 Personnel (Employee) files 12](#_Toc12379406)

[7.7 Funding Applications 12](#_Toc12379407)

[7.8 Training/Large Events 12](#_Toc12379408)

[7.9 Our Participants 13](#_Toc12379409)

[7.10 Volunteers 13](#_Toc12379410)

[7.11 E-mail 14](#_Toc12379411)

[7.12 Telephone calls 14](#_Toc12379412)

[7.13 Social Media and Images 15](#_Toc12379413)

[7.14 Starting a New Project/Piece of Work or Extending a Current Project/Piece of Work 15](#_Toc12379414)

[8.0 Subject Access Request 16](#_Toc12379415)

[Appendices 18](#_Toc12379416)

[Appendix A 18](#_Toc12379417)

[Sample Data protection release – Participant/service user 18](#_Toc12379418)

[Appendix B 20](#_Toc12379419)

[Sample Data Protection Release for Volunteers 20](#_Toc12379420)

[Appendix C 22](#_Toc12379421)

[Sample 1- Data Release Form; Social media and images 22](#_Toc12379422)

[Sample 2 – Instructions on booking form or signing in to an event 22](#_Toc12379423)

[Appendix D 23](#_Toc12379424)

[Statement: Policies and Procedures agreement 23](#_Toc12379425)

[Appendix E 24](#_Toc12379426)

[Sample - Policy Statement Agreement 24](#_Toc12379427)

[Appendix F - Data Protection Impact Assessment (DPIA) 25](#_Toc12379428)

[Appendix G - Information Asset Register 29](#_Toc12379429)

[Appendix H – GDPR Quick Reference Sheet; Your rights as a Data Subject under GDPR 31](#_Toc12379430)

[Appendix I - Privacy Notice; Volunteers 33](#_Toc12379431)

[Appendix J - Privacy Notice; Personnel (Employees) 35](#_Toc12379432)

[Appendix K - Privacy Notice; Worker 37](#_Toc12379433)

[Appendix L - Privacy Notice; Participant 39](#_Toc12379434)

[Appendix M - Privacy Notice; General Public for publication on website/facebook etc… 41](#_Toc12379435)

# Introduction

One Voice (Immingham District) Ltd is a volunteer organisation, and does not engage employees. Our purpose is to:

promote for the benefit of the public urban and/or rural regeneration in the socially and economically deprived area of Immingham and district by all or any of the following means:

* the relief of financial hardship
* the advancement of education, training or retraining, particularly among unemployed people, and providing unemployed people with work experience
* the maintenance, improvement or provision of public amenities
* the provision of recreational facilities for the public at large or those who by reason of their youth, age, infirmity or disablement, financial hardship or social or economic circumstances, have need of such facilities:
* the protection or conservation of the environment
* the provision of public health facilities and childcare:
* the promotion of public safety and prevention of crime

This policy has been drawn up to ensure that One Voice (Immingham District) Ltd and its workers (for the purpose of this policy only, this term includes self-employed workers, contractors and consultants only – the use of this term does not give right to employment or worker rights), volunteers and partners comply with the Act. Everyone is individually responsible for compliance with the Act and ensuring that they do not breach any part of it.

This policy must be read in conjunction with other relevant policies i.e. IT and all workers and volunteers must sign a statement to show that they have read, understood and will abide by the policies (Appendix D & E)

# The Regulation

The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) is a regulation by which the European Parliament, the Council of the European Union and the European Commission intend to strengthen and unify data protection for all individuals within the European Union (EU).

# 3.0 What information does the GDPR apply to?

## Personal data

The GDPR applies to ‘personal data’ meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

This definition provides for a wide range of personal identifiers to constitute personal data, including name, identification number, location data or online identifier, reflecting changes in technology and the way organisations collect information about people.

The GDPR applies to both automated personal data and to manual filing systems where personal data are accessible according to specific criteria. This could include chronologically ordered sets of manual records containing personal data.

Personal data that has been pseudonymised – e.g. key-coded – can fall within the scope of the GDPR depending on how difficult it is to attribute the pseudonym to a particular individual.

**3.2 Sensitive personal data**

The GDPR refers to sensitive personal data as “special categories of personal data” (GDPR Article 9).

The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. These must be processed in accordance with (GDPR Article 6)

Personal data relating to criminal convictions and offences are not included, but similar extra safeguards apply to its processing (GDPR Article 10).

# 4.0 Definitions

* A Data Controller determines the purposes and means of processing personal data. For the purposes of this Policy, One Voice (Immingham District) Ltd

is the Data Controller

* A Data Processor is responsible for processing personal data on behalf of a controller. For the purposes of this policy the processor is One Voice (Immingham District) Ltd, any contractors, self- employed individuals, partner organisations engaged to run activities on our behalf are also classed as Data Processors
* Data Protection Officer. The regulation requires that they have “expert knowledge of data protection law and practices.” And that the professional duties of the employee are compatible with the duties of the DPO and do not lead to a conflict of interests. Under the GDPR, you must appoint a DPO only if you:
	+ are a public authority (except for courts acting in their judicial capacity);
	+ carry out large scale systematic monitoring of individuals (for example, online behaviour tracking); or
	+ carry out large scale processing of special categories of data or data relating to criminal convictions and offences.

None of these apply to our organisation. However, should a serious issue arise, we would have to approach an external body or individual to act as our DPO

* Data Privacy Officer. This is the individual nominated to ensure that the organisation fulfils its duties under GDPR, but is not a Data Protection officer. For the purposes of this policy, the Data Privacy Officer is the Chair of the board of trustee directors of One Voice (Immingham District) Ltd.

#  5.0 The Principles

Under GDPR Article 5 there are 6 principles requiring that personal data must be:

1. processed lawfully, fairly and in a transparent manner in relation to individuals; The lawful bases for processing are set out in GDPR Article 5 of the GDPR. At least one of the following must apply whenever you process personal data:
	1. Consent: the individual has given clear consent for you to process their personal data for a specific purpose.
	2. Contract: the processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
	3. Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
	4. Vital interests: the processing is necessary to protect someone’s life.
	5. Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.
	6. Legitimate interests: the processing is necessary for your legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual’s personal data which overrides those legitimate interests. (This cannot apply if you are a public authority processing data to perform your official tasks.)
2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
3. You must not collect information unless there is a specific and valid reason
4. Must not be used for any other unrelated purpose
5. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
6. Only data needed for the specific purpose should be asked for or recorded.
7. Information that is not relevant must not be collected simply because it might be useful in the future!
8. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
9. Data users should record information accurately and reasonable steps should be taken to check accuracy
10. All data storage systems should be “spring cleaned” to destroy inaccurate and out of date information
11. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and Personal data processed for any purpose or purposes shall not be kept longer than is necessary for that purpose or those purposes.
12. It is already the case that controllers must inform subjects of the period of time (or reasons why) data will be retained on collection.
13. Should the data subject subsequently wish to have their data removed and the data is no longer required for the reasons for which it was collected then it must be erased.
14. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

# 6.0 The rights of the Data Subject

The GDPR provides the following rights for individuals:

1. The right to be informed
	* Individuals have the right to access their personal data and supplementary information.
	* The right of access allows individuals to be aware of and verify the lawfulness of the processing.
2. The right of access - under the GDPR, individuals will have the right to obtain:
	* confirmation that their data is being processed;
	* access to their personal data; and
	* other supplementary information – this largely corresponds to the information that should be provided in a privacy notice (Appendices I to M)
3. The right to rectification
	* Individuals are entitled to have personal data rectified if it is inaccurate or incomplete.
	* If you have disclosed the personal data in question to others, you must contact each recipient and inform them of the rectification - unless this proves impossible or involves disproportionate effort. If asked to, you must also inform the individuals about these recipients.
4. The right to erasure
	* Individuals have a right to have personal data erased and to prevent processing in specific circumstances:
	* Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
	* When the individual withdraws consent.
	* When the individual objects to the processing and there is no overriding legitimate interest for continuing the processing.
	* The personal data was unlawfully processed (i.e. otherwise in breach of the GDPR).
	* The personal data has to be erased in order to comply with a legal obligation.
	* The personal data is processed in relation to the offer of information society services to a child

However, there are some specific circumstances where the right to erasure does not apply and you can refuse to deal with a request.

You can refuse to comply with a request for erasure where the personal data is processed for the following reasons:

* + to exercise the right of freedom of expression and information;
	+ to comply with a legal obligation for the performance of a public interest task or exercise of official authority
	+ for public health purposes in the public interest
	+ archiving purposes in the public interest, scientific research historical research or statistical purposes; or
	+ the exercise or defence of legal claims
1. The right to restrict processing
	* individuals have a right to ‘block’ or suppress processing of personal data.
	* When processing is restricted, you are permitted to store the personal data, but not further process it.
	* You can retain just enough information about the individual to ensure that the restriction is respected in future.
2. The right to data portability
	* The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.
	* It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

The right to data portability only applies:

* + to personal data an individual has provided to a controller;
	+ where the processing is based on the individual’s consent or for the performance of a contract; and
	+ when processing is carried out by automated means.
1. The right to object - Individuals have the right to object to:
	* processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
	* direct marketing (including profiling); and
	* processing for purposes of scientific/historical research and statistics.
2. Rights in relation to automated decision making and profiling The GDPR has provisions on:
	* automated individual decision-making (making a decision solely by automated means without any human involvement); and
	* profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process.

# 7.0 Responsibilities

## 7.1 Data collection and processing

Active permission from the data subject must be obtained for the collection of any personal data. Personal data is anything that can identify individuals elsewhere.

Examples include name and address, anything to do with medical matters, employment history,

The data subject must be informed as to what information is being collected, the legal basis for collection the information (See Principle 1), and the specific purposes.

Separate consent must be obtained for **each** purpose. All forms should include a release as a matter of course, and this should be signed to indicate active consent. A sample Data Protection Release is attached at the end of this document - Appendix

A for guidance.

If taking verbal information or a referral, inform the other person that you will be recording the information they provide in accordance with GDPR Article 6(a) and ask them if they consent to doing so. Preferably, request that they provide their details in writing.

If information is being passed on you must ensure that we have permission to do so from the individual. No personal information must be passed on without their consent

If information is being passed to us, e.g. from an activities provider, ask whether the individual is aware that they are doing so. It is not our responsibility to inform the client that we now have the information and record the answer, but it is our responsibility to ascertain the facts.

Only authorised people can see personal information, including staff/worker/volunteer/participant/participant records.

An Information Asset Register should be maintained and regularly reviewed by the Trustee Director Board – the register will outline the data being kept i.e. volunteer database, where it is held and who is responsible for maintaining it.

See example Information Asset Register – Appendix G

## 7.2 Security

All hard copy personal data must be kept in locked cabinets etc.

We must aim to operate a clear desk/table policy. This means that no personal information must be left on a desk or table when you are not there. This includes short breaks or if you are supporting an activity.

Computer/laptop screens must be sited to ensure that unauthorised people cannot see personal information, e.g. away from windows, where at all possible. Screens must be locked if you are leaving the computer/laptop for any length of time

If transporting personal information as hard copy, place it in a sealed envelope and log what has been transported, where to and why.

Data held in electronic format must be secured either by password or encryption Passwords or PIN numbers must be changed periodically where necessary.

Ensure that any personal information deliberately deleted from your computer (and where you envisage never needing it again) is irrecoverable.

Name computer files with a clear, meaningful title to avoid confusion and accidental deletion.

Dispose of paper files/information securely, e.g. shredded.

Take reasonable precautions to protect computers/laptops and manual files from theft and physical damage, e.g. leave laptops in the locked boot of your car when out, do not leave it on view or easily accessible i.e. next to a ground floor open window or door etc. Use common sense precautions.

When sending information via email do not include any personal data other than basic details such as name and activity attended. Do not send any sensitive information. Emails are not secure.

Incoming email containing personal data must be deleted within one working week unless the personal data contained is needed for a specific purpose and the sender is aware of that purpose.

Client information must be kept up to date and only held for 2 years after our last contact with them unless specified otherwise in the permissions. (See sections 7.4 to 7.12 for guidance).

**7.3 Data breaches**

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

When a personal data breach has occurred, you need to establish the likelihood and severity of the resulting risk to people’s rights and freedoms. If it’s likely that there will be a risk, then we must notify the ICO; if it’s unlikely then you don’t have to report it.

In all instances a breach should be documented and reported to the Data Privacy Officer; the Board of Trustee Directors. Contact the Chair of the Board of Trustees in the first instance and if unsuccessful one of the remaining trustees

## 7.4 Employee Recruitment

One Voice (Immingham District) Ltd currently does directly employ individuals, however should this position change the following arrangements will come into force.

All application forms must include a data protection consent, and the Recruitment Privacy Policy must be part of the recruitment pack sent out.

All applications must be held securely under the terms of the GDPR policy.

All rejected applications must be disposed of securely 1 year after the closing date

All unsuccessful interviewee applications may be retained for a period of 1 year after the interview date in case of feedback requests, then must be disposed of securely

Successful interviewee applications should have 1 copy transferred to the personnel files, and all additional copies securely disposed of.

All application forms must state that the information provided will be handled in accordance with the GDPR

Unsolicited CV’s should be deleted and the candidate should be informed

**7.5 Workers - Self Employed/Contractor/Consultant**

Any personal information held must be held securely and not shared without the express permission of the individual.

Personal data must be disposed of securely 1 year after the individual has ceased providing services.

All must be given a copy of the One Voice (Immingham District) Ltd Privacy notice (Appendix K).

If a worker, contractor or consultant is to be given access to One Voice (Immingham District) Ltd files that may contain personal data they must be given a copy of the One Voice (Immingham District) Ltd GDPR Policy, the relevant Privacy Notices and other appropriate policies. The individual must sign the Policy Statement (Appendix D or/and E) to say that they have read and understood them and agree to abide by them

## 7.6 Personnel (Employee) files

One Voice (Immingham District) Ltd currently does directly employ individuals, however should this position change the following arrangements will come into force.

All documents pertaining to staff must be kept in a securely locked cabinet. No data relating to staff will be shared with unauthorised personnel.

Times sheets, leave sheets, sickness records, medical reports and correspondence from the projects must be printed off, filed in cabinet and electronic versions deleted both in Core and at the team sites.

Records of previous staff must only be kept for a period of 6 years to facilitate reference requests, or redundancy or litigation queries.

Any record kept beyond 6 years for litigation purposes must be securely disposed of 6 months after the final verdict, unless on appeal

Records pertaining to staff being transferred out of the organisation under TUPE must be handed on to the new organisation.

All staff must be given a copy of the One Voice (Immingham District) Ltd Privacy policy (Appendix J)

Relevant information pertaining to salaries, pension contributions and tax will be filed securely. Any information transmitted to a 3rd. party should be in pdf format where possible or by secure data transfer

## 7.7 Funding Applications

All funding applications should be stored and transferred securely.

Funding applications that include personal information must be disposed of securely 1 year after the deadline for applications has passed, unless they are successful and activities are being undertaken under the application. Organisational need may dictate that they are stored for a longer period - no more than 6 years

Basic information such as organisation name, funder and amount may be retained for monitoring purposes.

Any information used for case studies, recording or reporting project outcomes must be anonymised unless you have the express permission of the individual involved.

## 7.8 Training/Large Events

Details of attendees at events and training courses must be disposed of securely after the event. Any information retained for monitoring purposes should be anonymised unless you have the express permission of the attendee to quote them (e.g. in case studies etc.).

Whilst you are encouraged to take photographs of events for marketing and publicity purposes, you must make sure that attendees are aware of the fact and have the opportunity to decline inclusion.

At larger or bookable events, it will be advisable to:

* produce the Social media release (example Appendix C) and bring it to people’s attention as they sign in or book on to an event
* include instructions and control of other photographers notice at point of booking and/or signing in (example Appendix C)

## 7.9 Our Participants

Part of our work is provide activities for individuals to engage in – for the purpose of this policy these individuals are known as our participants.

It must be clear why personal information is being collected, refer to Section 5 – The Principles. The participant must have provided permission for the data to be collected - Access request (Appendix A)

All participants must have access to One Voice (Immingham District) Ltd.’s Privacy notice (Appendix L) before or at point of them granting permission to hold their data

Any personal information collected must be held securely and not shared without the express permission of the individual.

Personal data must be disposed of securely, either:

* 1 year after the individual has ceased to engage in our services and/or activities **or**
* if the activity is externally funded for the period of the funding or for a timeframe dictated by the fund provider.

This should be clear in the information provided to the participant

## 7.10 Volunteers

Any personal information held on volunteers must be held securely and not shared without the express permission of the volunteer. See example permission form (Appendix B).

Personal data must be disposed of securely 1 year after the volunteer has left service.

On recruitment, all volunteers must be given a copy of the One Voice (Immingham District) Ltd Privacy policy.

If any volunteer is to be given access to One Voice (Immingham District) Ltd files that may contain personal data, they must be given/undertake to:

* a copy of the One Voice (Immingham District) Ltd GDPR Policy,
* the relevant Volunteer Privacy Notice (Appendix I) and
* read other relevant policies, and

must sign the Policy Statement (example - Appendix D or E) to say that they have read and understood them and agree to abide by them.

## 7.11 E-mail

Were possible key individuals will be provided with a One Voice (Immingham District) Ltd email address – this will be determined by the Board of Trustee Directors.

It is One Voice (Immingham District) Ltd.’s policy that no personal information will be shared via email.

Volunteers should not use any email account to discuss or share personal information in their role with One Voice (Immingham District) Ltd.

Workers – should not use any email account to discuss or share personal information in their role with One Voice (Immingham District) Ltd.

However, common sense must apply. At times participants may email you using their personal email address – if you don’t need the information contained in the e-mail delete it. If you do need the information contained but not the e-mail trail, then extract and store the information securely elsewhere, inform the sender, and delete the e- mail trail.

If you receive an e-mail, active consent can be taken as read. However, it must be made clear, preferably in a Privacy notice (Appendix M) on our website/webpage/Facebook page that you will be retaining the email for no longer than necessary under GDPR Article 5 processing basis of *Legitimate Interests* and that the sender has the right to ask you to delete the e-mail.

If you are sending/responding to an e-mail, there must be sufficient information in your signature to inform the recipient of their rights and your intentions.

A link to the General Privacy Notice (Appendix M) can be provided in your email footer - if you have a One Voice email account.

The general advice is to store essential e-mails for no more than 2 years, although organisational need may dictate that they are stored for a longer period of no more than 6 years.

## 7.12 Telephone calls

If you write down personal details in the course of a telephone conversation with anyone from outside the organisation, you must inform the caller; if you intend to pass on those details, inform the caller.

Do not take more information than is necessary to you to perform your duty.

If the conversation involves a lot of information of a personal nature, you must inform the caller that you are recording it in accordance with Article 6 of GDPR, and preferably ask them to e-mail or write to you with the detail if at all possible

## 7.13 Social Media and Images

You must request a participant’s consent before posting images of them or including them on Social media or on the website (example Appendix C).

At larger events it isn’t always possible to get to participant’s consent especially for photography by others. An individual should be informed that photography by others cannot be fully controlled, if this is the case (example Appendix C). One Voice (Immingham District) Ltd will take reasonable and practicable steps, these may include:

* requesting the person to make themselves known when signing into the event
* providing a disclosure regarding other photography
* provide a designated non photography area if the type of event allows for this
* ban all photography
* request attendees not to take photographs

## 7.14 Starting a New Project/Piece of Work or Extending a Current Project/Piece of Work

In the event that One Voice (Immingham District) Ltd embarks on a new project the following should be considered in line with this policy:

1. Will there be new participants and new data to be collected?
2. What data is required to enable the project?
3. What are the reasons if any, for the data collection?
4. Will there be new workers or volunteers involved – will their data be collected?
5. As a result of the new project, will any data processed involve the following criteria:
	* Evaluation or scoring, including profiling and predicting, an example may a company building behavioural or marketing profiles based on usage or navigation on its website
	* Automated-decision making with legal or similar significant effect
	* Systematic monitoring: processing used to observe, monitor or control people
	* Sensitive data or data of a highly personal nature: this includes special categories of personal data as defined in GDPR Article 9
	* Data processed on a large scale
	* Matching or combining datasets
	* Data concerning vulnerable people
	* Innovative use or applying new technological or organisational solutions
	* data processing which hinders those involved in exercising their rights

In most cases if the data processed meets two of the criteria in point 5 (above) then a further assessment called a Data Protection Impact Assessment is required. There may be cases when only one of the criteria is met a DPIA is required, further guidance can be sought from the Information Commissioners Office - <https://ico.org.uk/global/contact-us/> and further information can be found at:

<https://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=611236> or

<https://easygdpr.eu/gdpr-article/9/> .

A Data Protection Impact Assessment helps to ensure that the data is processed with minimal risk - in an appropriate manner and in compliance with GDPR.

Finally, consider if there are/will be relevant contracts and agreements in place with partnership organisations, workers and others who may come into contact with the data being processed.

A Data Protection Impact Assessment can be found in Appendix F

# 8.0 Subject Access Request

Subject Access Requests (SARs) must be directed in the first instance to the Data Privacy Officer; the Board of Trustee Directors. All SARs must be made in writing; they may be sent by electronic means such e-mail. The trustee/director board should then respond, and take the following steps:

* verify the identity of the person making the request, using ‘reasonable means’.
* If the request is made electronically, provide the information in a commonly used electronic format.
* provide a copy of the information free of charge. However, One Voice (Immingham District) Ltd reserves the right to charge a ‘reasonable fee’ when a request is manifestly unfounded or excessive, particularly if it is repetitive.
* One Voice (Immingham District) Ltd may also charge a reasonable fee to comply with requests for further copies of the same information. This does not mean that One Voice (Immingham District) Ltd will charge for all subsequent access requests.
* The fee will be based on the administrative cost of providing the information.
* Information will be provided without delay and at the latest within one month of receipt.

One Voice (Immingham District) Ltd will be able to extend the period of compliance by a further two months where requests are complex or numerous. If this is the case, One Voice (Immingham District) Ltd will inform the individual within one month of the receipt of the request and explain why the extension is necessary.

The Board of Trustee Directors must retain records of the actions taken and their decision making to ensure compliance with the SAR.

# Appendices

#

### Appendix A

note this can be adapted to the needs of the project or activity



## Sample Data protection release – Participant/service user

With your permission, the information you have provided will be stored and used for the following purposes:

* + 1. For the distribution of newsletters, briefing papers, consultations, events, news and other information by One Voice (Immingham District) Ltd and partner/member organisations, to yourself.
		2. For inclusion in [DESCRIPTION]
		3. To support the work of [NAMES], allowing referrals to your organisation as appropriate

The contact and activity information provided will not be made available to the public.

Please note that

1. The data contained in these databases will not be passed on as a mailing list to other agencies.
2. The data contained in these databases will not be used for marketing or fundraising, beyond the activities outlined above
3. However, your contact details (organisation, address and phone number/e- mail) may be passed to individuals, partners and member organisations where relevant (e.g. when an individual or member organisation requires access to your services)
4. If you opt in below but wish to withhold particular information such as a personal address from the public domain, please contact One Voice (Immingham District) Ltd or indicate by putting WITHHOLD in the appropriate box.

By completing the information below, you are making clear to us what we can use the information you have provided for.

You can opt in or out of each of the purposes outlined. However, you can opt out at any time by e-mailing chair@onevoicecommunity.com or ringing 07513 612964

**Please indicate what you consent to by deleting YES/NO as appropriate:**

|  |  |  |
| --- | --- | --- |
| 1 | For the distribution of newsletters, briefing papers, consultations, events, news and other information by One Voice (Immingham District) Ltd and partner/member organisations and contracted individuals, to the contact details you have provided.  | YES/NO |
| 2 | For inclusion in reports and monitoring documents for evaluation and funding purposes for the work of One Voice (Immingham District) Ltd (reports will be anonymised unless express permission is gained) | YES/NO |
| 3 | To support the work of One Voice (Immingham District) Ltd, allowing referrals to relevant organisations as appropriate and with your expression permission   | YES/NO |
| 5 | I give permission to have photographs, audio or video recordings to be used for internal advertising of this project  | YES/NO |
| 6 | I give permission to have photographs, audio or video recording to be used for external advertising of this project | YES/NO |
| 7 | I give permission for One Voice (Immingham District) Ltd to collate the information on this form for the use of evidence to [INSERT relevant funder/contract]  | YES/NO |

**Data protection statement:**

I understand that the information I have provided will be used only for the purposes specified on the form, and will be stored in accordance with the provisions of the Data Protection Act (1998) and the General Data Protection Regulations (2018)

Name Date:

Organisation: Signature:

*Please note, if returning this form electronically, the e-mail it is attached can be taken in place of the signature where appropriate and if so indicated*

Please return this form to:

### Appendix B

note this can be adapted to the needs of the project or activity

 

## Sample Data Protection Release for Volunteers

1. The personal data stored by One Voice (Immingham District) Ltd is used to register you as a volunteer and administer the effective allocation of your skills and attributes within roles and opportunities available to you as part of [PROJECT NAME] delivery
2. The data we hold will not be passed on as a mailing list to other agencies.
3. The data stored by [PROJECT NAME] will not be used for marketing or fundraising,
4. However, your contact details may be passed to individuals, partners and member organisations with your express permission to enable you to carry out your role as a volunteer

By completing the information below, you are making clear to us what we can use the information you have provided for.

You can opt in or out of each of the purposes outlined. However, you can opt out at any time by e-mailing chair@onevoicecommunity.com or ringing 07513 612964

**Please indicate what you consent to by deleting YES/NO as appropriate:**

|  |  |  |
| --- | --- | --- |
| 1 | For the distribution of newsletters, briefing papers, consultations, events, news and other information by One Voice (Immingham District) Ltd and partner/member organisations and contracted individuals, to the contact details you have provided.  | YES/NO |
| 2 | For inclusion in reports and monitoring documents for evaluation and funding purposes for the work of One Voice (Immingham District) Ltd (reports will be anonymised unless express permission is gained) | YES/NO |
| 3 | To support the work of One Voice (Immingham District) Ltd, allowing referrals to relevant organisations as appropriate and only with your express permission   | YES/NO |
| 5 | I give permission to have photographs, audio or video recordings to be used for internal advertising of this project  | YES/NO |
| 6 | I give permission to have photographs, audio or video recording to be used for external advertising of this project | YES/NO |
| 7 | I give permission for One Voice (Immingham District) Ltd to collate the information on this form for the use of evidence to [INSERT relevant funder/contract]. The information will be anonymised.  | YES/NO |

**Data protection statement**:

I understand that the information I have provided will be used only for the purposes specified, and will be stored in accordance with the provisions of the Data Protection Act (1998) and Article 6(a) of the General Data Protection Regulations (2018)

Name: Date: Signature:

### Appendix C

Note this can be adapted to the needs of the project or activity



## Sample 1- Data Release Form; Social media and images

I am aware that One Voice (Immingham District) Ltd may be taking photographs of this event/activity for marketing purposes or funder evidence and that images including me may be uploaded to Social media, the website or used in other publications.

**Yes**, I am happy for images that include me to be used this way □

**No**, I do not wish to be included in any publicity materials □

Name:

Organisation (if applicable):

Date:



## Sample 2 – Instructions on booking form or signing in to an event

[On the day of the/At this] event there will be photos being taken.

Let us know if you're happy to be included in our photos.

If you do not wish for your photo to be taken, please see a member of staff or one of our volunteers to make yourself known.

**Please note** **we cannot control other people taking photographs.**

### Appendix D

## Statement: Policies and Procedures agreement

Sample [use appropriate, - Employee/Contractor/Self-employed worker/Volunteer]

I have read and understood the Policies and Procedures of the One Voice (Immingham District) Ltd and agree to be bound by them.

Name: Role:

Signature: Date:

### Appendix E

 

## Sample - Policy Statement Agreement

I have read and understood the additional guidelines and policy/ies; [LIST] as they are applied at One Voice (Immingham District) Ltd and agree to be bound by them.

Name:

Signature: Date:



### Appendix F - Data Protection Impact Assessment (DPIA)

**Please read the GDPR Policy before completing this assessment – paying particular attention to Section 7.14.**

|  |
| --- |
| **Step one: Identify the need for a Data Protection Impact Assessment****(DPIA)**Explain what the project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties. You may find it helpful to link to other relevant documents related to the project, for example a project plan or proposal.Also summarise why the need for a **DPIA** was identified |

|  |
| --- |
| **Step two: Describe the information flows – where and when the data is collected and its journey, and how many people the data is collected from.** You should describe the collection, use and deletion of personal data here. It may also be useful to draw a flow diagram - another way of explaining data flows. You should also say how many individuals are likely to be affected by the project.When is the data collected? Where is it collected?What types of data are collected?Where does it go to?Who will have access?When will the data be deleted?How many people’s data will be collected? |

|  |
| --- |
| **Consultation/Communication requirements**Explain what practical steps you will take to ensure that you identify and address privacy risks. Who should be consulted/communicated to internally and externally?How will you carry out the consultation/communication?You should link this to the relevant stages of your project management process/plan.You can use consultation/communication at any stage of the DPIA process. |
| **Step three: Identify the privacy and related risks**Identify the key privacy risks and the associated compliance and organisational risks. Larger-scale DPIAs might record this information on a more formal risk register.

|  |  |  |  |
| --- | --- | --- | --- |
| Privacy issue | Risk to individuals | Compliance risk | Associated organisational risk |
|  |  |  |  |

 |
| **Step four: Identify privacy solutions**Using the risks identified in Step 3, describe/state for each: * the actions you could take to reduce the risk
* any future steps which would be necessary (e.g. the production of new guidance or future security testing for systems).
* The resultant level of risk
* Is the response proportionate to the project?

|  |  |  |  |
| --- | --- | --- | --- |
| **Risk** |  **Solution(s)** | **Result:** is the risk eliminated, reduced, or accepted? | **Evaluation:** is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project? |
|  |  |  |  |

  |

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Step five: Sign off and record the DPIA outcomes** What solutions need to be implemented? Who has approved the privacy risk and solutions involved in the project?

|  |  |  |
| --- | --- | --- |
| Risk | Approved solution | Approved by  |
|  |  |  |

 |

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Step six: Integrate the DPIA outcomes back into the project plan/operational activity** Who is responsible for integrating the DPIA outcomes back into the project plan/operational activity? Who is responsible for implementing the solutions that have been approved? Who is the contact for any privacy concerns that may arise in the future?

|  |  |  |
| --- | --- | --- |
| Action to be taken | Date for completion of actions | Responsibility for action |
|  |  |  |

|  |
| --- |
| Contact point for future privacy concerns:  |
|  |

 |



### Appendix G - Information Asset Register

Referenced to 7.1 of the GDPR policy – please read prior to completion.

Please fill in this form *detailing each separate information asset*.

This is to be checked by the trustee board regularly and is to be retained within One Voice (Immingham District) Ltd.’s charity documentation.

**Definitions**

**Asset name**: e.g. volunteer database, Mailchimp list, membership list, e-mail contacts, timesheets

**Information held**: this could be volunteer details, staff details, membership details, mail distribution lists – list **personal** data types recorded

**Location(s):** e.g. folder on Z Drive, filing cabinet, individual PC, Sharepoint, Drop Box, website (give details). If held in more than one place give details of each place

**Maintained by:** who has overall responsibility?

**Accessed by:** which **named** individuals have access to that particular information (this includes volunteers where relevant)

**Shared with:** is the data shared with any other asset/organisation (e.g. delivery partner - if so, name)

**Reviewed** (e.g. how often is the information updated or weeded?)

|  |  |
| --- | --- |
| **Asset 1** |  |
| **Asset name** |  |
| **Information held** |  |
| **Location** |  |
| **Maintained by** |  |
| **Accessed by** |  |
| **Shared with** |  |
| **Reviewed** |  |

|  |  |
| --- | --- |
| **Asset 2** |  |
| **Asset name** |  |
| **Information held** |  |
| **Location** |  |
| **Maintained by** |  |
| **Accessed by** |  |
| **Shared with** |  |
| **Reviewed** |  |

|  |  |
| --- | --- |
| **Asset 3** |  |
| **Asset name** |  |
| **Information held** |  |
| **Location** |  |
| **Maintained by** |  |
| **Accessed by** |  |
| **Shared with** |  |
| **Reviewed** |  |



### Appendix H – GDPR Quick Reference Sheet; Your rights as a Data Subject under GDPR

The General Data Protection Regulation provides the following rights for individuals:

a) The right to be informed

 You have the right to access your personal data and supplementary information.

 The right of access allows you to be aware of and verify the lawfulness of the processing.

b) The right of access - under the GDPR, you have the right to obtain:

 confirmation that your data is being processed;

 access to your personal data; and

 other supplementary information – this largely corresponds to the information that should be provided in a privacy notice

c) The right to rectification

 You are entitled to have personal data rectified if it is inaccurate or incomplete.

d) The right to erasure

 You have a right to have personal data erased and to prevent processing in specific circumstances:

* Where the personal data is no longer necessary in relation to the purpose for which it was originally collected/processed.
* If you withdraw consent.
* If you object to the processing and there is no overriding legitimate interest for continuing the processing.
* The personal data was unlawfully processed (i.e. otherwise in breach of the GDPR).
* The personal data has to be erased in order to comply with a legal obligation.
* The personal data is processed in relation to the offer of information society services to a child

However, there are some specific circumstances where the right to erasure does not apply and we can refuse to deal with a request for the following reasons:

* to exercise the right of freedom of expression and information;
* to comply with a legal obligation for the performance of a public interest task or exercise of official authority
* for public health purposes in the public interest
* archiving purposes in the public interest, scientific research historical research or statistical purposes; or
* the exercise or defence of legal claims.

e) The right to restrict processing

 You have a right to ‘block’ or suppress processing of personal data.

 When processing is restricted, we are permitted to store the personal data, but not further process it.

 We can retain just enough information about you to ensure that the restriction is respected in future.

f) The right to data portability

 The right to data portability allows you to obtain and reuse your personal data for your own purposes across different services.

 It allows you to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

The right to data portability only applies:

 to personal data you have provided to a controller;

 where the processing is based on your consent or for the performance

of a contract; and

 when processing is carried out by automated means.

g) The right to object – You have the right to object to:

 processing based on legitimate interests or the performance of a task

in the public interest/exercise of official authority (including profiling);

 direct marketing (including profiling); and

 processing for purposes of scientific/historical research and statistics.

h) Rights in relation to automated decision making and profiling

The GDPR has provisions on:

 automated individual decision-making (making a decision solely by automated means without any human involvement); and

 profiling (automated processing of personal data to evaluate certain things about an individual). Profiling can be part of an automated decision-making process.



### Appendix I - Privacy Notice; Volunteers

This Privacy Notice tells you what to expect when One Voice (Immingham District) Ltd collects and uses your personal data in accordance with the General Data Protection Regulation.

|  |  |
| --- | --- |
| **Data Controller** | One Voice (Immingham District) Ltd  |
| **Our contact details:** | Address: xxxxx Email chair@onevoicecommunity.com |
| **The purpose we are processing your personal data for is** | To register you as a volunteer and administer the effective allocation of the volunteer’s skills and attributes within roles and opportunities for One Voice (Immingham District) Ltd |
| **Using your personal information for other purposes** | We will not process your personal data for any other purpose than that for which it was collected, without first providing you with information on that other purpose and seeking your express consent, if applicable. Exception - when we are required to disclose your personal data in accordance with legislation for example in relation to the prevention and detection of crime, counter terrorism, safeguarding, legal proceedings or to protect interests of you or another. |
| **The fair and lawful basis we are processing your****personal data on is…** | Article 6 (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes |
| **Am I required to provide One Voice (Immingham District) Ltd with my personal data?** | No |
| **Does One Voice (Immingham District) Ltd processing of my personal data involve automated decision-making,****including profiling?** | No |
| **Can I withdraw my consent for processing** | You can withdraw your consent for the processing of your personal data at any time. |
| **Who we will share****your personal data with** | Your contact details may be passed to organisations as appropriate with your additional and express permission - this will include contractors, self-employed workers, consultants who One Voice (Immingham District) Ltd have engaged to undertake activity sessions.Information may be anonymised for reporting to an external grant funder. If information is to be shared with an external grant funder without anonymization, then additional permission will be requested.  |
| **Transfers of personal data to a country or territory outside the****EEA** | No transfer |
| **How long we will retain your personal data for** | We will keep your data for up to 1 year after you cease volunteering for us, to allow us to provide references for you on your request |
| **What are my rights in relation to my personal data?** | You have the right to access the personal data we hold about you; to request we rectify or erase your personal data; to object to or restrict processing in certain circumstances; and a right of data portability in certain circumstances. |
| **Who can I complain to?** | If you are dissatisfied with how we have processed your personal data, you can contact the Chair of One Voice (Immingham District) Ltd Board of Trustee Directors in the first instance to request an internal review. You can do this via email or in writingIf you are dissatisfied with the outcome of the internal review, you have the right to appeal directly to the Information Commissioner for an independent review. <https://ico.org.uk/concerns/> |
| **Contact details for our Data Privacy Officer** | Chair of One Voice (Immingham District) Ltd, Address xxxxxxxx. Email chair@onevoicecommunity.comTelephone: xxxxx |



### Appendix J - Privacy Notice; Personnel (Employees)

One Voice (Immingham District) Ltd currently does directly employ individuals, however should this position change the following arrangements will come into force and will require updating accordingly.

This Privacy Notice tells you what to expect when One Voice (Immingham District) Ltd collects and uses your personal data in accordance with the General Data Protection Regulation.

|  |  |
| --- | --- |
| **Data Controller** | One Voice (Immingham District) Ltd |
| **Our contact details:** | Address: xxxxx Email chair@onevoicecommunity.com |
| **The purpose we are processing your personal data for is** | To enable us to process your details for payroll, pension and other contractual requirements |
| **Using your personal information for other purposes**  | We will not process your personal data for any other purpose than that for which it was collected, without first providing you with information on that other purpose and seeking your consent if applicable; except where we are required to disclose your personal data in accordance with legislation for example in relation to the prevention and detection of crime, counter terrorism, safeguarding, legal proceedings or to protect interests of you or another. |
| **Organisations acting on our behalf to process your personal data** | **Not applicable at this time**Payroll: Pension provider:  |
| **The fair and lawful basis we are processing your personal data on is**  | Article 6 (b)processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract and Article 9 (h) processing is necessary for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment |
| **Am I required to provide One Voice (Immingham District) Ltd with my personal data** | Yes, to enable us to fulfil our contractual and legal duties |
| **Does One Voice (Immingham District) Ltd.’s processing of my personal data involve automated decision-making, including profiling?** | No |
| **Can I withdraw my consent for processing** | No, it is necessary to fulfil contractual obligations |
| **Who we will share your personal data with** | Payroll: Pensions: |
| **Transfers of personal data to a country or territory outside the EEA** | No transfer |
| **How long we will retain your personal data for** | We will retain your personal data for 6 years after you cease employment with us to allow us to respond to reference requests, redundancy or litigation queries. Personal data can be retained beyond 6 years if for litigation purposes but must be securely disposed of 6 months after the final verdict, unless on appeal. |
| **What are my rights in relation to my personal data?** | You have the right to access the personal data we hold about you; to request we rectify or erase your personal data; to object to or restrict processing in certain circumstances; and a right of data portability in certain circumstances. More information on your rights can be found on the Information Commissioner’s website. <https://ico.org.uk>  |
| **Who can I complain to?** | If you are dissatisfied with how we have processed your personal data, you can contact the Data Privacy Officer to request an internal review.If you are dissatisfied with the outcome of the internal review, you have the right to appeal directly to the Information Commissioner for an independent review. <https://ico.org.uk/concerns/> |
| **Contact details for our Data Privacy Officer** | Chair of One Voice (Immingham District) Ltd, Address xxxxxxxx. Email chair@onevoicecommunity.comTelephone: xxxxx |



### Appendix K - Privacy Notice; Worker

For the purpose of the GDPR policy and Privacy document, the term worker includes self-employed workers, contractors and consultants only – the use of this term does not give right to employment or worker rights.

One Voice (Immingham District) Ltd currently engages self –employed individuals, contractors and consultants to support the facilitation of some of its projects.

This Privacy Notice tells you the worker what to expect when One Voice (Immingham District) Ltd collects and uses your personal data in accordance with the General Data Protection Regulation.

|  |  |
| --- | --- |
| **Data Controller** | One Voice (Immingham District) Ltd |
| **Our contact details:** | Address: xxxxx Email chair@onevoicecommunity.com |
| **The purpose we are processing your personal data for is** | To enable us to process your details for payment of invoices, contractual or service level agreements, and other contractual requirements |
| **Using your personal information for other purposes**  | We will not process your personal data for any other purpose than that for which it was collected, without first providing you with information on that other purpose and seeking your consent if applicable; except where we are required to disclose your personal data in accordance with legislation for example in relation to the prevention and detection of crime, counter terrorism, safeguarding, legal proceedings or to protect the interests of you or another. |
| **Organisations acting on our behalf to process your personal data** | No other party  |
| **The fair and lawful basis we are processing your personal data on is**  | Article 6 (b)processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract  |
| **Am I required to provide One Voice (Immingham District) Ltd with my personal data** | Yes, to enable us to fulfil our contractual and legal duties |
| **Does One Voice (Immingham District) Ltd.’s processing of my personal data involve automated decision-making, including profiling?** | No |
| **Can I withdraw my consent for processing** | No, it is necessary to fulfil contractual obligations |
| **Who we will share your personal data with** | No other party  |
| **Transfers of personal data to a country or territory outside the EEA** | No transfer |
| **How long we will retain your personal data for** | We will retain your personal data for 1 year after you have ceased providing services  |
| **What are my rights in relation to my personal data?** | You have the right to access the personal data we hold about you; to request we rectify or erase your personal data; to object to or restrict processing in certain circumstances; and a right of data portability in certain circumstances. More information on your rights can be found on the Information Commissioner’s website. <https://ico.org.uk>  |
| **Who can I complain to?** | If you are dissatisfied with how we have processed your personal data you can contact the Data Privacy Officer to request an internal review.If you are dissatisfied with the outcome of the internal review, you have the right to appeal directly to the Information Commissioner for an independent review. <https://ico.org.uk/concerns/> |
| **Contact details for our Data Privacy Officer** | Chair of One Voice (Immingham District) Ltd, Address xxxxxxxx. Email chair@onevoicecommunity.comTelephone: xxxxx |



### Appendix L - Privacy Notice; Participant

For the purpose of the GDPR policy and privacy document, the term participant includes any individual who accesses the activities of One Voice (Immingham District) Ltd

This Privacy Notice tells you the participant what to expect when One Voice (Immingham District) Ltd collects and uses your personal data in accordance with the General Data Protection Regulation.

|  |  |
| --- | --- |
| **Data Controller** | One Voice (Immingham District) Ltd |
| **Our contact details:** | Address: xxxxx Email chair@onevoicecommunity.com |
| **The purpose we are processing your personal data for is** | To provide information that enables us to safeguard your wellbeing when undertaking activities that One Voice (Immingham District) Ltd are providing either directly or through contracted provision. Information provided will also be anonymised for reporting to our external funders |
| **Using your personal information for other purposes**  | We will not process your personal data for any other purpose than that for which it was collected, without first providing you with information on that other purpose and seeking your consent if applicable; except where we are required to disclose your personal data in accordance with legislation for example in relation to the prevention and detection of crime, counter terrorism, safeguarding, legal proceedings or to protect the interests of you or another. |
| **Organisations acting on our behalf to process your personal data** | No other party  |
| **The fair and lawful basis we are processing your personal data on is**  | Article 6 (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes  |
| **Am I required to provide One Voice (Immingham District) Ltd with my personal data** | No, but not providing it may impact on services you wish us to provide |
| **Does One Voice (Immingham District) Ltd.’s processing of my personal data involve automated decision-making, including profiling?** | No |
| **Can I withdraw my consent for processing** | Yes - you can withdraw your consent for the processing of your personal data at any time. |
| **Who we will share your personal data with** | Elements of your personal data may be shared with ‘Workers’ - the term worker includes self-employed workers, contractors and consultants who are acting on behalf of One Voice (Immingham District) Ltd, to deliver activities sessions.  |
| **Transfers of personal data to a country or territory outside the EEA** | No transfer |
| **How long we will retain your personal data for** | We will retain your personal data for 1 year after your last engagement with One Voice (Immingham District) Ltd or as dictated by a funders should this differ.  |
| **What are my rights in relation to my personal data?** | You have the right to access the personal data we hold about you; to request we rectify or erase your personal data; to object to or restrict processing in certain circumstances; and a right of data portability in certain circumstances. More information on your rights can be found on the Information Commissioner’s website. <https://ico.org.uk>  |
| **Who can I complain to?** | If you are dissatisfied with how we have processed your personal data you can contact the Data Privacy Officer to request an internal review.If you are dissatisfied with the outcome of the internal review, you have the right to appeal directly to the Information Commissioner for an independent review. <https://ico.org.uk/concerns/> |
| **Contact details for our Data Privacy Officer** | Chair of One Voice (Immingham District) Ltd, Address xxxxxxxx. Email chair@onevoicecommunity.comTelephone: xxxxx |



### Appendix M - Privacy Notice; General Public for publication on website/facebook etc…

This Privacy Notice tells you what to expect when One Voice (Immingham District) Ltd collects and uses your personal data in accordance with the General Data Protection Regulation.

|  |  |
| --- | --- |
| **Data Controller** | One Voice (Immingham District) Ltd |
| **Our contact details:**  | Address: xxxxx Email chair@onevoicecommunity.com |
| **The purpose we are processing your personal data for is** | To enable us to send you news and information from our distribution lists;To undertake and/or receive funding applications;To facilitate your attendance at events, activities and training run by us including the processing of paymentsTo respond to email and telephone conversations |
| **Using your personal information for other purposes**  | We will not process your personal data for any other purpose than that for which it was collected, without first providing you with information on that other purpose and seeking your consent if applicable; except where we are required to disclose your personal data in accordance with legislation for example in relation to the prevention and detection of crime, counter terrorism, safeguarding, legal proceedings or to protect interests of you or another. |
| **The fair and lawful basis we are processing your personal data on is** | Article 6 (a) **-** the data subject has given consent to the processing of his or her personal data for one or more specific purposes and Article 6 (b)processing is necessary for the performance of a contract to which the data subject is party |
| **Am I required to provide One Voice (Immingham District) Ltd with my personal data** | No, but not providing it may impact on services you wish us to provide |
| **Does One Voice (Immingham District) Ltd.’s processing of my personal data involve automated decision-making, including profiling?** | No |

|  |  |
| --- | --- |
| **Can I withdraw my consent for processing** | You can withdraw your consent for the processing of your personal data at any time. |
| **Who we will share your personal data with** | Other organisations and individuals as appropriate, as requested by you |
| **Transfers of personal data to a country or territory outside the EEA** | No transfer |
| **How long we will retain your personal data for** | Mailing lists - your personal data will be securely disposed of at your request or if the database is ‘cleansed’ and we do not receive consent to retain the data. Email information – the email or information extracted will be retained for 2 years unless you give us permission to retain it longer for a specified purpose, or organisational need dictates that the information is stored for a longer period - no more than 6 years Information captured as part of a telephone call - information extracted will be retained for 2 years unless you give us permission to retain it longer for a specified purpose, or organisational need dictates that the information is stored for a longer period - no more than 6 years Funding applications – 1 year after the funding deadline has closed unless successful and activities are being undertaken against the application. Organisational need may dictate that the information is stored for a longer period - no more than 6 years Training – disposed of immediately unless you give us permission to retain it longer for a specified purpose, or organisational need dictates that the information is stored for a longer period - no more than 6 years. |
| **What are my rights in relation to my personal data?** | You have the right to access the personal data we hold about you; to request we rectify or erase your personal data; to object to or restrict processing in certain circumstances; and a right of data portability in certain circumstances.  |
| **Who can I complain to?** | If you are dissatisfied with how we have processed your personal data you can contact the Data Privacy Officer to request an internal review.If you are dissatisfied with the outcome of the internal review, you have the right to appeal directly to the Information Commissioner for an independent review. <https://ico.org.uk/concerns/> |
| **Contact details for our Data Privacy Office** | Chair of One Voice (Immingham District) Ltd, Address xxxxxxxx. Email chair@onevoicecommunity.comTelephone: xxxxx |