



Adi's Legacy CiC
Registered Company number 14334853
Data Protection Policy

This policy applies to all volunteers, directors, trustees, employees and any individual or organisation working on behalf of ADI'S LEGACY CiC

Definitions

- **"Adi's Legacy"** means Adi's Legacy CiC Registered Company number 14334853
- **"Client"** means a recipient of services and goods provided by Adi's Legacy
- **"Staff"** means all volunteers, directors, trustees, employees and any individual working or carrying out activities on behalf of Adi's Legacy
- **"Workplace"** means any premises or location (including the Adi's Legacy shop) where the Adi's Legacy activities are carried out by the staff
- **"Donor"** means an individuals who has donated funds or goods to Adi's Legacy

The purpose of this policy:

- to ensure person identifiable data is controlled and processed in a manner which respects individual rights and our legal obligations
- to provide staff with the overarching principles that guide our approach to data protection.

Adi's Legacy will seek to keep personal data secure and accurate by:

Awareness

- Ensuring all Staff are aware of the need to protect personal identifiable data
- Appointing a director with specific responsibility for Data Protection
- All staff will sign a confidentiality agreement with Adi's Legcay

Information held

- Adi's Legacy will maintain a personal identifiable data (PID) register
- Adi's Legacy does not hold personal data defined as sensitive data under the Data Protection Act 2018
- Adi's Legacy does not record and process CCTV data
- Only personal identifiable data (PID) necessary to allow Adi's Legacy to carry out its activities as defined in Adi's Legacy's objectives will be held. This will include data on the following subjects
 - Clients
 - Staff
 - Donors
 - Others

Third Parties



- Adi's Legacy may use Social Media Platforms eg Facebook to facilitate clients communicating with each other and gifting. Personal data provided by clients during these activities is not stored or processed by Adi's Legacy but by the social media platform eg Facebook. Clients should refer to the Data Processing Policies and Statements of the social media platforms as published.
- Adi's Legacy may use third parties eg PayPal, SumUp etc to collect and process financial transactions. Clients should refer to the Data Processing Policies and Statements of those third parties as published (eg on their websites).

Communicating privacy

- A data privacy statement and this policy will be published on the website (www.adislegacy.com)

Individuals rights

- Subject access requests will be responded to with information in a format accessible to the subject
- Individuals have the right to request any personal information Adi's Legacy processes is amended or deleted
- Individuals have the right to restrict how Adi's Legacy processes their data

Subject Access Requests

- Adi's Legacy will respond to subject access requests in the UK for data which it holds in accordance with the timescales and requirements of the Data Protection Act 2018

Lawful basis for processing personal data

- Person Identifiable Data will only be processed by Adi's Legacy where there is a legitimate reason to access the data in carrying out the defined objectives of Adi's Legacy. Specifically
 - Donor Data is processed on the basis of consent
 - Client data is processed on the basis of consent
 - Volunteer Data is processed on the basis of Agreement (Contract)

Personal Data Breaches

- Any personal data breach (or suspected breach) will be referred to the Data Protection Lead who will be responsible for investigating the breach/potential breach and if required reporting to the Information Commissioner Office (ICO) as required under UK data protection legislation.
- Risk assessments will include an assessment of the risk of personal data breaches

Data protection by design and data protection impact assessments

- Recording and storing information professionally and securely
- Maintaining a person identifiable data (PID) register
- No automated decision making (including profiling) based on individual's data will be carried out.



Record Retention & Disposal

- Staff personal identifiable data will be held for the duration of the member of staff's assignment and for a further six months thereafter or longer only if there is a legal basis to do so.

General

- Providing effective management to support this policy for staff through supervision, support, training and quality assurance measures
- Ensuring there are effective complaints and whistleblowing measures in place

Exceptions & Exemptions

- A data protection officer (DPO) is not required to be assigned
- Adi's Legacy is exempt from registering for payment of a data protection fee with the Information Commissioners Office (ICO).
- Adi's Legacy does not offer any online services to children.
- Adi's Legacy does not carry out any activities outside the UK
- At this time the Adi's Legacy does not employ any staff
- Adi's Legacy does not hold personal data defined as sensitive data under the Data Protection Act 2018
- Adi's Legacy does not record and process CCTV data
- No automated decision making (including profiling) based on individual's data will be carried out.

Legal Framework

The policy has been drawn up on the basis of law and guidance, applicable within the UK, that seeks to protect children, namely:

- Data Protection Act 2018 (including General Data Protection Regulations (GDPR))
- Computer misuse act 1990
- Human Rights Act 1998

This policy should be read alongside all other policies of Adi's Legacy

This Policy when approved will be published on the Adi's Legacy website (www.adislegacy.com)

Contact Details

Data Protection Lead

Name

Email

Adi's Legacy is committed to reviewing policies and good practice annually.



This policy was last reviewed on 25 March 2023

Signed : Paula Green
(Director)