



GENERAL DATA PROTECTION POLICY

1. Purpose & Scope of Policy

In order to fulfil its objectives, Sedbury Space needs to collect, store and process certain types of information about individuals and organisations within the community it serves. This policy is designed to ensure that this information is treated sensitively and legally, protecting the rights of those individuals and organisations.

This policy applies to all employees and volunteers, including directors and trustees, and committee members, who have submitted personal information to Sedbury Space or may have access to such information in the course of their relationship with Sedbury Space.

2. Policy Statement

Information about individuals held by Sedbury Space falls within the scope of the General Data Protection Regulation (2018). As such, Sedbury Space will ensure that personal data will be:

- Obtained and processed fairly, lawfully and transparently.
- Held only for specified, explicit and legitimate purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate and up-to-date.
- Not kept longer than necessary.
- Processed in a manner that ensures appropriate security.

In most circumstances the collection, storage and processing of data by Sedbury Space will have the lawful basis of a 'legitimate interest'. Data will only be used in ways that people would reasonably expect and will have a minimal privacy impact. For such activities Sedbury Space has conducted a Legitimate Interest Assessment (LIA) to ensure the appropriateness of this lawful basis. A record of the LIA accompanies this policy.

Where special category data is involved e.g. ethnic origin, disability, health, the lawful basis for collecting, storing and processing such data is 'consent', where individuals are required to opt in to allow their data to be held and used by Sedbury Space.

Sedbury Space will not collect, store or process data about criminal convictions.

Individuals about whom information is held by Sedbury Space, have the right to be informed of what information is held about them, to have access to such information, to rectify, transfer or erase such information and to restrict or object to the processing of that information.

3. Policy Implementation

This policy is accompanied by documentation overtly detailing for each of Sedbury Space activities:

- categories of individuals on whom information is held,
- categories of data recorded,
- the lawful basis for holding and processing such data,
- the purpose of processing such data,
- the retention period for storing the data
- the method of data storage used

Directors of Sedbury Space will appoint a Data Protection Officer who will be responsible for ensuring all data is kept according to this policy and privacy statement.

Access to an individual's personal record of information is free of charge but Sedbury Space reserves the right to levy a charge for excessive or repetitive demands to cover administration costs.

If at any point the directors/trustees deem that the collection, storage or processing of data constitutes a high risk to an individual's rights or freedoms, Sedbury Space will conduct a Data Privacy Impact Assessment (DPIA) and follow up on the outcomes accordingly.

Sedbury Space will disclose attributable personal information to the appropriate authorities where there is a legal duty to do so, including abuse of vulnerable adults or children, where an illegal act has taken place, or a beneficiary is at risk of harming themselves or others.

4 Approval and Review

This policy has been approved by the Trustees and will be reviewed on an annual basis.

Signed:  (Chair of Sedbury Space)

Date approved: 08.06.2020

Review date: March 2021