

# Data Protection and Privacy Policy

## Introduction

This privacy notice sets out the way we process or use the personal information you give us when you join or volunteer for SSB, or become a trustee or employee, and gives details of our data protection policy.

SSB is an open organisation and encourages dissemination of information. It is also a responsible organisation, and respects the private life of individuals. We therefore seek to ensure that personal information is handled properly and that it complies with the requirements of the Data Protection Act 2018, which reflects the General Data Protection Regulation (GDPR) (EU 2018).

## Lawful reason to process data

Under Data Protection Act 2018 there are a number of lawful reasons that we can use (or 'process') your personal information. One of these lawful reasons is called '*Legitimate Interests*'.

Broadly speaking 'Legitimate Interests' means that we can use your personal information if we have a genuine and legitimate reason to do so and we are not harming any of your rights and interests. SSB Trustees have conducted a Legitimate Interests Assessment using guidelines from the Information Commission Office, and a copy of this is kept to demonstrate compliance with the GDPR.

Under this lawful basis for processing data, we can use your information in the legitimate interest of carrying out our objectives which are to:

- a) advance the education of the public in matters concerning the benefits (social, economic and environmental) of sustainable development ('sustainable development' being that which meets the needs of the present without compromising the ability of future generations to meet their own needs);
- b) conserve and protect the physical and natural environment by the initiation, promotion and delivery of actions, projects and initiatives that encourage the participation of the public and ensure the long term sustainability and character of the area of benefit;

In practice this means that, with your consent, we may contact you to tell you of our activities, provide reports and give membership information. Usually this will be via email. However, if you have no email address, we may telephone you or deliver a newsletter to your address.

For the purposes of IT hosting and maintenance your information may be situated outside of the UK. We have verified that our cloud provider adheres to several self-regulatory frameworks, including the EU-US Privacy Shield Framework; and that it works with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding transfer of personal data that cannot be resolved with users directly.

SSB uses 'MailChimp' to send emails to members who have supplied an email address. In order to do this email addresses are held on the MailChimp servers. MailChimp is fully GDPR compliant; see <https://mailchimp.com/gdpr/>.

Before using any information you have supplied, we will consider and balance any potential impact on you and your rights.

## **Your rights**

These are as ruled by The Information Commissioner, (<https://ico.org.uk/>) UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

- **Your right to be informed if your personal data is being used**

We will ensure that we ask you for consent to any data SSB collects

- **Your right to get copies of your data**

You have the right to ask us, in writing, for a copy of all the personal data held about you. Please write to Sustainable South Brent, The School House, South Brent, TQ10 9BP or email [info@sustainablesouthbrent.org.uk](mailto:info@sustainablesouthbrent.org.uk). A copy will be sent to you within one month

- **Your right to get your data corrected**

If you want us to update or amend your personal data or you want to alter your preferences about how we communicate with you. Please write to Sustainable South Brent, The School House, South Brent, TQ10 9BP or email [info@ssb.org.uk](mailto:info@ssb.org.uk). The changes will be made within one month.

- **Your right to get your data deleted**

If, at any time, you want us to erase your personal data please write to Sustainable South Brent, The School House, South Brent, TQ10 9BP or email [info@ssb.org.uk](mailto:info@ssb.org.uk). The changes will be made within one month. This may mean that you no longer receive information from SSB. If you no longer wish to receive the email bulletins please click 'unsubscribe' at the end of the bulletin.

- **Your right to limit how organisations use your data**

When we ask you for information, we will inform you about the reasons SSB collects personal data and what we will use it for. SSB takes confidentiality seriously and personal data collected and processed by us will be shared only with SSB Trustees and Group Leaders when necessary or to facilitate SSB activity you are involved in. (Within groups, individuals may share emails in order to coordinate their activities). We do not share your personal information with other organisations.

- **Your right to data portability**

We will enable you to get your information from SSB in an accessible way

- **The right to object to the use of your data**

If you object to our use of your personal data please write to Sustainable South Brent, The School House, South Brent, TQ10 9BP or email [info@ssb.org.uk](mailto:info@ssb.org.uk). We will discuss this with you within one month in order to ensure that you do not lose services you wish to retain.

- **Your rights relating to decisions being made about you without human involvement**

N/A to our organisation, as we don't make any decisions in this way.

- **Your right to access information from a public body**

Covered in this Privacy Policy.

- **Your right to raise a concern**

If you have any concerns about any aspect of this policy, please write to Sustainable South Brent, The School House, South Brent, TQ10 9BP or email [info@ssb.org.uk](mailto:info@ssb.org.uk).

### **Disclosure and Barring Service'(DBS) checks**

When specific activities undertaken for SSB, as part of a role as a volunteer, trustee or employee, involve regulated activity with children or vulnerable adults, then, under the SSB Safeguarding Policy (Annex B) a 'Disclosure and Barring Service' (DBS) check may be requested. If this is the case the result of such a check will remain confidential to the Safeguarding Officer and Company Secretary and in consultation with the Chairman any consequential decisions will be reported to the Board. All matters disclosed in the DBS enquiry shall remain confidential and information shall be retained in accordance with guidance from DCC as the umbrella data control organisation.

We hold your information only as long as necessary. When you cease to be a member, trustee, employee or volunteer, we will delete your detailed data from our records within two years.

This privacy policy will be reviewed by SSB's Trustees at least every 2 years. SSB is not required to appoint a Data Protection Officer, but the Company Secretary or designated trustee will act to safeguard SSB's interests in this regard.

### **Action to be taken in the event of a Data Breach**

See SSB's [Reporting a Data Breach Procedure v1.0](#)

### **References:**

European Union (2018) *General Data Protection Regulation (GDPR)*. Accessed on-line (05/01/2021): <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/>

The Information Commissioner's Office (2021): *Your Data Matters*. Accessed on-line (05/01/2021):<https://ico.org.uk/your-data-matters/>)

Sustainable South Brent (2020) *Safeguarding policy*. Accessed on-line (05/01/2021) [http://www.sustainablesouthbrent.org.uk/documents/16/formal-company-documents/6255/ssb\\_policy\\_safeguarding\\_reviewed-november-2020.pdf](http://www.sustainablesouthbrent.org.uk/documents/16/formal-company-documents/6255/ssb_policy_safeguarding_reviewed-november-2020.pdf)

UK Parliament (2018) *Data Protection Act 2018*. Accessed on-line (05/01/2021): <https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted>

For internal use only

**POLICY/PROCEDURE/PROTOCOL INFORMATION**

<b>Date agreed by Board:</b>	Jan.2021
<b>Review Date:</b> This document should be reviewed following any changes in relevant laws or regulations and also following any incident or feedback reported under it.  If this document is found 'satisfactory, no change required' upon review it will not be re-issued, but the completion of the review will be minuted at the next board meeting.	
<b>Date added to website/GoogleDrive:</b>	Dec.2021
<b>Version:</b>	1.0
<b>Person responsible for updating:</b>	Lead Trustee, P&Ps