

The Reef

GDPR Policy – Adopted 2nd October 2023

1. Context

- 1.1 The Reef (Colehill and Wimborne Youth and Community Centre) is a small charity holding just a small amount of personal data on a small number of people. The Trustees understand and accept their responsibility under the UK General Data Protection Regulations (UKGDPR) to hold all personal data securely and use it only for legitimate purposes with the knowledge and approval of the data subjects.

2. Definitions

2.1 Data Subject

A data subject is an identifiable individual person about whom The Reef holds personal data.

2.2 Contact Information

For the purposes of this Policy, “Contact Information” means any or all of the person’s:

- full name (including any preferences about how they like to be called)
- full postal address
- telephone and/or mobile number(s)
- e-mail address(es)
- social media Ids/UserNames

3. Key Principles

- 3.1 The Reef will ensure that all personal data that it holds will be:

- a) processed lawfully, fairly and in a transparent manner;
- b) collected only for specified, explicit and legitimate purposes and used in ways that are incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date, with reasonable steps taken to ensure that personal data that are inaccurate are erased or rectified without delay;
- e) 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; and

- f) 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.

4. Lawful Processing

The Reef will obtain, hold and process all personal data in accordance with the UKGDPR for the following lawful purposes. In all cases the information collected, held and processed will include Contact Information (as defined in 2.2 above).

4.1 By Consent

People who are interested in, and wish to be kept informed of, the activities of The Reef.

- The information collected may additionally contain details of any particular areas of interest about which the person wishes to be kept informed.
- The information provided will be held and processed solely for the purpose of providing the information requested by the person.

4.2 By Contract

People who sell goods and/or services to, and/or purchase goods and/or services from The Reef.

- The information collected will additionally contain details of:
 - a) The goods/services being sold to, or purchased from The Reef;
 - b) Bank and other details necessary and relevant to the making or receiving of payments for the goods/services being sold to, or purchased from The Reef.
- The information provided will be held and processed solely for the purpose of managing the contract with The Reef.

4.3 By Legal Obligation

People where there is a legal obligation on the Charity to collect, process and share information with a third party – eg: the legal obligations to collect, process and share with HM Revenue & Customs payroll information on employees of the Charity.

The information provided will be held, processed and shared with others solely for the purpose of meeting the Charity's legal obligations.

4.4 By Legitimate Interest

Volunteers, Administrators and Trustees

In order to be able to operate efficiently, effectively and economically, it is in the legitimate interests of The Reef to hold such personal information on its volunteers, administrators and trustees to enable the Reef to communicate with them on matters relating to the operation of the charity, eg:

- the holding of meetings;
- providing information about The Reef's activities;
- seeking help, support and advice.

Closed Circuit TV (CCTV) Recording

The Reef collects video CCTV images of people entering and moving around its premises in order to protect the building and contents from theft and vandalism and as a safeguarding measure. The information collected is only processed and, where appropriate, shared with other authorities (eg: the Police) where it is necessary to investigate a potential crime.

5. Individual Rights

5.1 The right to be informed

When collecting personal information The Reef will provide a Privacy Notice which explains the purpose for collecting the data, and the data subject's rights in relation to The Reef's use of the data.

5.2 The right of access

The data subject shall have the right to obtain confirmation as to whether or not personal data concerning him/her are being processed, and, where that is the case, access to his/her personal data.

5.3 The right to rectification

The data subject shall have the right to require that any inaccurate or incomplete personal data concerning him/her is rectified without undue delay.

5.4 The right to erase

Except where the data are held for purposes of legal obligation (4.3) the data subject shall have the right to require that any personal data concerning him/her is erased without undue delay.

5.5 The right to restrict processing

Where there is a dispute between the data subject and The Reef about the accuracy, validity or legality of data held, then the data subject shall have the right to require The Reef to cease processing the data for a reasonable period of time to allow the dispute to be resolved.

5.6 The right to data portability

Where data are held for purposes of consent or contract (4.1 or 4.2) the data subject shall have the right to require The Reef to provide him/her with a copy in a structured, commonly used and machine-readable format of the data which he/she has provided.

5.7 The right to object

The data subject shall have the right to object at any time to processing of personal data concerning him/her. Where the data subject objects we will cease processing the data unless obliged to do so for legal reasons.

5.8 Rights in relation to automated decision making and profiling

The Reef does not use any form of automated decision making or the profiling of individuals based on their personal data.

6. Third Party Access to Data

6.1 Under no circumstance will the Charity share with, sell or otherwise make available to Third Parties any personal data except where it is necessary and unavoidable to do so in pursuit of its charitable objects as authorised by the Trustees.

7. Data Breach

7.1 In the event of any data breach, The Reef will promptly assess the risks and if appropriate report the breach to the Information Commission’s Office (ICO).

Version History

Date	Summary of Changes
2/10/23	New Policy

This Policy will be reviewed annually.