

FOWC General Data Protection Regulation Compliance

1. Awareness

All trustees were made aware of the GDPR in April 2018 both verbally at the Executive meeting and by the “12 steps” document being available on the FOWC website. All future trustees will be made aware of GDPR.

The lawful basis will be “Legitimate Interest” which means that a person will not have to formally agree to their data being held by FOWC.

2. Information we hold

FOWC holds personal data for its trustees and members. It does not have a conventional office.

Trustees – the information held about trustees is the same as that required by the Charities Commission but additionally FOWC holds email addresses and telephone numbers. These details are held electronically by the Treasurer, Secretary and Membership Secretary and only shared between trustees. Other than the Charities Commission these details are not given to other people and organisations unless specifically requested by the trustee or for operating the bank accounts. When a trustee resigns his/her data will be deleted within one year.

Members and donors – Members and donors give the basic information necessary to communicate with them, being, name, address, phone and email. Additionally some sign gift aid forms which declare whether they pay income tax above the value of the donation. Children’s data is limited to just their parents’ data. Forms are kept on paper and electronically by the Treasurer. Data will be destroyed three years after the member last paid the membership fee or a donor gave a donation.

No information on members or donors will be given to or shared with any other organisation.

3. Communicating privacy information

All forms whether electronic or paper which require personal data will have the following wording at the bottom of the form:

“The lawful basis for FOWC holding your data under the General Data Protection Regulations is Legitimate Interest”

4. Individuals’ rights

Data can be obtained by the individual concerned from the FOWC Treasurer by photocopy, electronically or by computer printout.

The GDPR includes the following rights for individuals:

The right to:

- be informed
- access
- rectification
- erasure
- restrict processing
- data portability
- object
- not to be subjected to automated messaging

5. Subject access requests

There will be no charge for complying with a request and the reply will be given within one month.

6. Lawful basis for processing personal data

The lawful basis for FOWC processing personal data is Legitimate Interest.

7. Consent

Consent is not required as the lawful basis is Legitimate Interest.

8. Children

Children's data will be limited to just their parents' data.

9. Data breaches

Having a procedure to detect personal data breaches is not practical for such a small organisation with small data bases. A breach would be most likely to be detected by a complaint.

A breach would be investigated by a group of the Chair, Treasurer and Membership Secretary and notified to the ICO if it were likely to result in a risk to the rights and freedoms of individuals – if, for example, it could result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage.

Where a breach is likely to result in a high risk to the rights and freedoms of individuals, those concerned will be notified directly.

10. Data Protection by Design and Data Protection Impact Assessments

Personal data systems will be designed to protect privacy appropriate to the risk and size of any possible data protection breach.

FOWC is a low risk for significant data protection breaches.

A formal Data Protection Impact Assessment is not required as FOWC

- is not deploying new IT technology
- does not use profiling
- there is no processing of the special categories of data

11. Data Protection Officer

The FOWC Trustees take responsibility for data protection and the contact is the Treasurer.

FOWC, as a not for profit small organisation, is not required to formally designate a Data Protection Officer.

12. International

FOWC does not operate in more than one EU member state.

Edward Coales (Trustee and Treasurer of the Friends of Wortham Church)

26th April 2018