



S.A.L.V.E. International

Data Protection and communications Policy (including GDPR Compliance)

Approval Date	16/04/2018
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Definitions

S.A.L.V.E	Stands for Support and Love Via Education, a UK registered charity.
GDPR	means the General Data Protection Regulation 2018, effective May 25 th 2018
Responsible Person	Laura McCartan, Project Officer, is responsible for ensuring all data is used appropriately (Data controller).
Register of Systems	A register of all systems or contexts in which personal data is processed by the Charity.
Beneficiary	A service user of programmes run by S.A.L.V.E. International

Data protection principles

S.A.L.V.E is committed to being transparent about how it collects and processes data, in accordance with our responsibilities under all relevant legislation including GDPR. This policy covers the following people for whom the organisation holds personal data; supporters, sponsors and fundraisers, in both the UK and abroad.

This means that all personal data should be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial 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; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

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- 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; 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.”

What does this mean?

1. General information:

- a. This policy applies to all personal data processed by the S.A.L.V.E.
- b. S.A.L.V.E.'s Project Officer is responsible for the charity's on going compliance with this policy.
- c. This policy shall be reviewed at least once every two years and approved by the trustee board.

2. Keeping it fair and transparent:

- a. At S.A.L.V.E, we ensure that all processing of data is lawful, fair and transparent. This means that data is only collected and stored where there is a good reason e.g contractual requirement, for keeping your data, and kept somewhere-secure e.g. locked cabinet or office, ensuring only the appropriate people have access to it.
- b. We are aware, and annually review where data is stored and ensure this is appropriate.
- c. Our supporters and beneficiaries have the right to access their personal data, and can ask us at any time what data we keep of theirs. We will respond as quickly as possible to your request.

3. Why do we collect your data?

- a. We will only collect your data for one of the following reasons:
 - You have told us you would like to hear from us, e.g. through our mailing list, or through the post.
 - We need your information for legal reasons e.g. DBS checks or to process gift aid
 - If you have fundraised for us, or donated money, or for another reason that makes us believe you have a legitimate interest in hearing from us in the future.
- b. We will keep a record of when and how you said you would like to keep in contact with us, along with the data we need to communicate with you.
- c. We will make sure that you are aware of how to stop receiving communications from us, and regularly review how easy this is to do.

4. Minimisation and accuracy:

- a. S.A.L.V.E. will ensure that personal data we keep is adequate, relevant and only what is necessary for the reason we have your data.
- b. We will try to keep your information as accurate as we can.

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5. Removing your information:

- a. To make sure that we don't keep your data longer than necessary, S.A.L.V.E. will evaluate what data we have every two years, and remove anything deemed unnecessary. The Project Officer is primarily responsible for this, under the supervision of the CEO.
- b. For some purposes, for example gift aid, and child protection, it may be necessary to keep specific data for longer periods.
- c. If you ask us to delete your personal data, this will be done permanently, leaving no record. However, it may be necessary to keep some information for legal reasons, and if so, this will be explained to you.

6. Keeping it safe:

- a. S.A.L.V.E. will ensure that personal data is stored securely using software that is kept up to date.
- b. Access to personal data shall be limited to only those who need access to it.
- c. We use passwords on all personal information to make sure your data is not shared without permission. If we hold physical copies of personal data, they are kept securely locked in our UK office.
- d. We back up all of our files securely to make sure your information is not lost or misplaced.
- e. All S.A.L.V.E. staff and volunteers have a duty not to reveal any confidential information externally unless required to do so by a court of law.
- f. While we use external parties to send out E-newsletters, and to store information, we retain responsibility for your data at all times.

7. Breaches of information:

- a. In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, we will assess how serious the risk was, and if appropriate report this breach to the ICO (Information Commissioner's Office).

8. International Data sharing:

- a. All information that is shared between the UK and Uganda falls under the same data protection regulations and is treated with the same level of importance, using the same security measures. This means only necessary information is given to members of staff in both countries. For example, means that while a Resettlement and Education social worker may need the name of a UK sponsor, they would not need the address, or bank details for such a person, and would therefore not have access to this information.
- b). All supporters from outside of the United Kingdom have their data stored and processed using the same password protected storage system.