

# **Birse Community Trust (BCT) GDPR Policy**

## **Introduction**

1. GDPR requires BCT to safely and responsibly manage the personal data that it holds. BCT holds a limited amount of personal data on members and previous customers of BCT products which allows the Trust to:
  - a. Contact members to provide updates as required (for example, dates of meetings and to mail copies of the Annual Report).
  - b. React efficiently to requests for BCT products from returning customers (without ever contacting such individuals on an unsolicited basis)

All the data processing is carried out as part of one of the following lawful actions:

- Consent
  - Contract
  - Legal obligation
  - Public task or
  - Legitimate interests
2. BCT is committed to protecting all the personal data held by the Trust in line with its responsibilities under GDPR, and in particular ensuring that any processing of data by the Trust is lawful, fair and transparent. The Chairman is the Trustee nominated to ensure BCT's compliance with GDPR.
  3. BCT, as a Charity, is exempt from registering as an organisation that processes personal data with the Information Commissioners office.

## **Data and Data Processing**

4. All the information held by the Trust has already been, and will continue to be in future, acquired with the explicit permission of members via membership application forms and/or by individuals contacting BCT in order to purchase BCT products. Any member or customer has the right to access their personal data or to ask for their data to be removed from the BCT records and the Trust will comply with their requests as quickly as possible.
5. The Trust will ensure that personal data is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed. BCT will take reasonable steps to ensure personal data is accurate and is kept up to date. BCT will ensure that personal data is not kept for any longer than necessary.

## **Security**

6. The Trust will ensure that any personal data is stored securely using software that is kept up-to-date with appropriate back-up systems in place. Access to personal data shall be limited to personnel who need access who will not share the data without a justified reason. When personal data is deleted this should be done safely such that the data is irrecoverable.

BCT holds names, addresses and email details of individuals who have contacted BCT in order to purchase BCT products. BCT shall not obtain this data by any other means and shall not use this data to issue follow-up communications after purchases have been completed. Such data is accessible only by BCT's office manager and administrator on a password-protected basis.

BCT holds Associate Members' contact details, as well as the names and addresses of all of those within the Birse Parish (BCT's area of operation) in order to mail copies of the BCT Annual Report. This information is accessible only by BCT's office manager and administrator and is held securely on a password-protected basis.

BCT shall destroy obsolete computer equipment securely to ensure any historic data held is not accessible.

### Breaches and Investigations

7. The Trustees will investigate any breach of data security (accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data held by the BCT). The resulting report and the actions identified will be reviewed at the next Trustee meeting. The Chairman will be responsible for ensuring that any actions are completed including, if necessary, reporting the incident to the Information Commissioner's Office.

### Review

8. This policy shall be reviewed annually and updated as required.