

SNAAP Data Protection Policy

Introduction

SNAAP is committed to protecting your privacy. This statement explains when, how and why we collect information about you, how we use it, the circumstances in which we may disclose it to others and the way we work to keep your information safe and secure.

SNAAP has considered the Data Protection Act 1998, the General Data Protection Regulation 2016 and the Privacy and Electronic Communication Regulations 2003.

Scope of the Policy

Personal information is any information that relates to a living individual who can be identified from the information. This includes any expression of opinion about an individual and intentions towards an individual. It also applies to personal data held visually in photographs or video clips (including CCTV) or as sound recordings.

SNAAP collects a large amount of personal data every year including: details of staff and volunteers, and names, addresses and other personal information about our families. In addition, it may be required by law to collect and use certain types of information to comply with statutory obligations of Local Authorities (LAs), government agencies and other bodies.

The Seven Principles

The GDPR sets out seven principles for the lawful processing of personal data. Processing includes the collection, organisation, structuring, storage, alteration, consultation, use, communication, combination, restriction, erasure or destruction of personal data. Broadly, the seven principles are:

- *Lawfulness, fairness and transparency* – data must be processed lawfully, fairly and in a transparent manner in relation to individuals
- *Purpose limitation* – data must be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing of data 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
- *Data minimisation* – data collection must be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- *Accuracy* - data collected must be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate are erased or rectified without delay after having regard to the purposes for which they are processed
- *Storage limitation* – data must be 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

- *Integrity and confidentiality (security)* – data must be 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

Responsibilities

SNAAP must:

- manage and process personal data properly
- protect the individual's right to privacy
- provide an individual with access to all personal data held on them.

SNAAP has a legal responsibility to comply with the General Data Protection Regulation 2016 and is named as the Data Controller under the legislation.

Data Controllers are people or organisations who hold and use personal information. They decide how and why the information is used and have a responsibility to establish workplace practices and policies that are in line with the legislation.

SNAAP is required to 'notify' the Information Commissioner of the processing of personal data. This information will be included in a public register which is available on the Information Commissioner's website www.ico.org.uk

Why we collect information about you

We collect information so that we may:

- provide you with the service(s) you have requested
- keep you informed of what we are doing
- ask you to assist us in fundraising activities or process a donation to us
- comply with our administrative duties, financial regulations and the law

How do we collect information about you?

We collect and store information about you whenever you interact with us including for example when you register with us to receive any of our services, when you apply to work or volunteer with us, when you make a donation to us or leave us a legacy or otherwise give us any other personal information.

We may also receive information about you from third parties for a specific purpose, for example if you are referred to us by Social Services.

Before we collect any data from anyone under 18 years of age we will always ask them to obtain the permission of their parent or guardian.

How do we use your information?

We may use your information to:

- fulfil your request to receive a service from us or to provide you with any requested information
- process and verify any financial transactions arising from donations to us, purchases from us or other payments
- record and process any interaction we have with you
- process any application for a job or volunteering role
- communicate with you about our services and our mission
- comply with our administrative duties, financial regulations and the law
- carry out research to improve and promote SNAAP

We fully understand and accept the fact that when you provide us your information you expect us to keep it safely and may not want us to share it with other organisations.

We will never sell or rent your information

We will treat your information as confidential and only share it with, for example:

- your family, next of kin, friends or associates who act on your behalf
- our volunteers and/or employees who provide you with a service
- trusted third parties including medical professionals in the event of a medical emergency or if you are unwell, the Police, courts or any other regulatory authority

Using our website

You may browse our website without disclosing any information to us. However, if you visit our website anonymously, we may still record information about the areas of the website you visit, the amount of time you spend on it, whether you are new to it or have visited it before, how you came to our website – for example, through an email link or a search engine - and the type of computer, browser, network location and internet connection you use. This information doesn't tell us anything about who you are or where you live; it simply allows us to monitor and improve our service.

If you visit our website and provide information about yourself, perhaps to make a donation or request a service from us, we will treat that information in accordance with this statement.

Job applications and volunteering opportunities

If you apply for a job or volunteering opportunity with us we will collect information to assess your suitability for the role. We will only use the information you give us to process your application and to monitor recruitment statistics and undertake relevant checks.

We will put together a file about your employment or volunteering role which will be kept secure, used only for matters that apply directly to your role with SNAAP and will be kept after your role with us has ended in accordance with our record retention policy. You can contact us to find out more about this.

How can a service user check, amend or request the deletion of the data SNAAP holds about them?

A service user may contact SNAAP to check their data, or correct inaccuracies found in the data which we hold about them, or if they no longer wish to receive information from us, at any point in time. This can be done via:

Email: info@snaap.org.uk

Post:
SNAAP
Windchimes
Reynolds Close
Herne Bay
Kent
CT6 6DS

Phone: 01227 367555

It will help us to update information quickly if the service user includes their full name and address together with details of the correction to be made. You can also choose to remove yourself from our mailing list via our website www.snaap.org.uk

Your rights and choices

Current legislation gives you the right to see all the personal information we hold on you, the right to have it amended and the right to stop us causing you damage or distress.

If you want to see the information we hold on you then you can send a request to the Data Protection Officer at the address above. We may charge you a £10 fee for this service and will deal with every request promptly and independently.

For more information visit the ICO's website (www.ico.gov.uk) which provides further detailed guidance on a range of topics including individuals' rights, exemptions from the legislation, dealing with subject access requests, how to handle requests from third parties for personal data to be disclosed etc.

Last updated: 31st October 2020

Next review due: October 2022