



## Friends of Bangor Garth Pier Data Protection Policy

### Introduction

Under the United Kingdom General Data Protection Regulations (UKGDPR) the FBGP is required to comply with the UK-GDPR and undertakes to do so. This policy relates to the personal data that the FBGP holds for its trustees and volunteers.

### Our Principles

FBGP will ensure that all personal data that it holds will be:

- Processed lawfully, fairly and in a transparent manner;
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Adequate, relevant and limited to what is necessary;
- Accurate and kept up to date;
- Kept in a form which permits identification of data subjects for no longer that is necessary;
- 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.

### Our Policy:

FBGP will obtain, hold and process all personal data in accordance with the UK-GDPR for the following lawful purposes:

1. **By Consent:** People who are interested in and wish to be kept informed of the activities of the FBGP.
2. **By Contract:** People who sell goods and/or services to, and/or purchase goods/ or services from the FBGP

The information collected will additionally contain details of:

- a) The goods/ services being sold to, or purchased from the FBGP
- 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 FBGP.

C Owen July 2023

Approved by Board of Trustees July 2023

Date for review: July 2025

The Friends of Bangor Garth Pier registered charity number:1198201

3. **By legal obligation:** People where there is a legal obligation on the FBGP to collect, process and share information with a third party e.g.: the legal obligations to share information with HM Revenue and Customs
4. **By Vital Interest:** The FBGP undertakes no activities which require the collection or holding of personal information for reasons of vital interest.
5. **By Public Task:** The FBGP undertakes no activities which require the collection or holding of personal information.
6. **Legitimate Interest:** In order to operate efficiently, effectively and economically, it is in the legitimate interest of the FBGP to hold such personal information on its volunteers and trustees as will enable the Charity to communicate with its volunteers on matters relating to the operation of the charity, eg:
  - a) the holding of meetings;
  - b) providing information about the Charity's activities
  - c) seeking help, support and advice from volunteers/trustees, particularly where they have specific knowledge and experience;
  - d) ensuring that any particular needs of the volunteer/trustee are appropriately and sensitively accommodated when organising meetings and other activities of the Charity.

## Individual Rights

### **The right to be informed:**

When collecting personal information the Charity will provide to the data subject free of charge, a Privacy Policy written in clear and plain language which is concise, transparent, intelligible and easily accessible.

### **The right of access:**

The data subject shall have the right to obtain from the controller 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 and the information detailed in the Charity's relevant Privacy Policy:

### **The right to rectification:**

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

### **The right to erase:**

Except where the data are held for purposes of legal obligation or public task the data subject shall have the right to require the controller without undue delay to erase any personal data concerning him/her.

### **The right to restrict processing:**

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

**The right to data portability:**

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

**The right to object:**

People are allowed to object to their personal data being held

**Responsibility**

FBGP is a small charity holding just a small amount of non- sensitive data on a small number of people.

The Trustees understand and accept their responsibility under the UK General Data Protection Regulation (UK-GDPR) to hold all personal data securely and use it only for legitimate purposes with the knowledge and approval of the volunteers.

The Trustees undertake to uphold the principles and requirements of the UK-GDPR in a manner which is proportionate to the nature of the personal data being held by the Charity. The policies are based on the Trustees' assessment, in good faith, of the potential impacts on both the Charity and its data subjects of the personal data held by the Charity being stolen, abused, corrupted or lost.

***DataProtectionOfficer***

In the considered opinion of the Trustees the scope and nature of the personal data held by the Charity is not sufficient to warrant the appointment of a Data Protection Officer.

Accordingly, no Data Protection Officer is appointed.

***DataController***

The Board of Trustees is the Data Controller for the Charity.

***Access to Data***

Except where necessary to pursue the legitimate purposes of the Charity, only the Data Processors shall have access to the personal data held by the Charity.