



FRIENDS OF BANGOR GARTH PIER

DATA PROTECTION POLICY

Version: 2.2

Approved By: Board of Trustees

Approval Date: 16 June 2026

Review Date: 16 June 2027

Charity Number: 1198201

1. POLICY STATEMENT

The Friends of Bangor Garth Pier ("the Charity") is committed to protecting the privacy, rights and freedoms of all individuals whose personal information it processes.

The Charity recognises its obligations under:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Data (Use and Access) Act 2025
- Privacy and Electronic Communications Regulations (PECR)
- Guidance issued by the Information Commissioner's Office (ICO)

The Charity will ensure that all personal data is handled lawfully, fairly, securely and transparently.

2. PURPOSE

The purpose of this policy is to:

- Protect personal information held by the Charity.
- Ensure compliance with applicable legislation.
- Provide guidance to Trustees and volunteers.
- Promote confidence amongst members, volunteers, donors and supporters.
- Demonstrate accountability and good governance.

3. SCOPE

This policy applies to all personal data processed by the Charity relating to:

- Trustees
- Volunteers
- Members
- Donors and supporters
- Contractors and suppliers
- Website users
- Individuals attending Charity events
- Any person contacting the Charity

The policy applies to information held electronically, on paper, in cloud systems, email systems and any other storage medium.

4. DATA PROTECTION PRINCIPLES

The Charity shall ensure personal data is:

Lawful, Fair and Transparent

Processed only where a lawful basis exists and in a manner that individuals would reasonably expect.

Purpose Limited

Collected only for specified and legitimate purposes.

Data Minimised

Adequate, relevant and limited to what is necessary.

Accurate

Kept accurate and up to date.

Storage Limited

Retained only for as long as necessary.

Secure

Protected through appropriate technical and organisational measures.

Accountable

The Charity shall be able to demonstrate compliance with all applicable data protection legislation.

5. ACCOUNTABILITY

The Charity will demonstrate compliance through:

- Maintaining this policy.
- Annual policy reviews.
- Trustee oversight.
- Records of Processing Activities (ROPA).
- Data breach recording.
- Staff and volunteer awareness.
- Security controls.
- Privacy notices.
- Complaint handling procedures.

The Board of Trustees retains ultimate responsibility for data protection compliance.

6. LAWFUL BASES FOR PROCESSING

The Charity may process personal data under the following lawful bases:

Consent

Where individuals request information, subscribe to newsletters, volunteer for activities or consent to photography or publicity activities.

Consent shall:

- Be freely given.
- Be specific and informed.
- Be capable of withdrawal at any time.

Contract

For administration of suppliers, contractors and service providers.

Legal Obligation

Where processing is required by law including:

- HM Revenue & Customs
- Charity Commission
- Insurance obligations
- Financial auditing requirements

Legitimate Interests

Where necessary for the effective operation of the Charity, including:

- Trustee administration
- Volunteer coordination
- Event management

- Governance activities
- Communication regarding Charity activities

Where required, Legitimate Interest Assessments shall be completed.

Recognised Legitimate Interests

Where permitted by law, the Charity may rely upon Recognised Legitimate Interests as provided under UK data protection legislation.

7. PERSONAL DATA HELD

The Charity may process:

- Names
- Postal addresses
- Email addresses
- Telephone numbers
- Membership information
- Volunteer records
- Trustee records
- Donation records
- Gift Aid information
- Financial transaction records
- Supplier information
- Website enquiry information

The Charity shall only collect information necessary for legitimate charitable purposes.

8. SPECIAL CATEGORY DATA

The Charity does not routinely process Special Category Data.

Where necessary to support volunteers, trustees or visitors, the Charity may process limited information relating to:

- Accessibility requirements
- Health conditions relevant to participation
- Dietary requirements

Such information shall:

- Be collected only where necessary.
- Be restricted to authorised persons.
- Be securely stored.
- Be deleted when no longer required.

9. PRIVACY NOTICES

The Charity shall maintain appropriate Privacy Notices explaining:

- What information is collected.
- Why it is collected.
- The lawful basis for processing.
- How long information is retained.
- Who receives information.
- Individual rights.
- How complaints may be made.

Privacy Notices shall be available free of charge and in accessible formats where practicable.

10. INDIVIDUAL RIGHTS

Individuals have the right to:

Be Informed

Know how their information is used.

Access

Request a copy of personal data held by the Charity. In responding to a subject access request, the Charity will undertake a reasonable and proportionate search for personal data, in accordance with the Data (Use and Access) Act 2025. Where a request is complex or multiple requests are received from one individual, the response period may be extended by up to two further months; the individual will be informed of any extension and the reason for it within one month of the original request.

Rectification

Correct inaccurate information.

Erasure

Request deletion where legally permissible.

Restriction

Request limits on processing.

Data Portability

Receive their information in a structured, commonly used and machine-readable format where applicable.

Object

Object to processing based upon legitimate interests.

Withdraw Consent

Withdraw consent at any time.

Automated Decision-Making

Request human review of any automated decision where applicable.

Complain

Make a complaint to the Charity or the Information Commissioner's Office.

The Charity will normally respond to all requests for the exercise of individual rights within one month of receipt.

Where additional information is required to identify an individual or clarify a request, the Charity may pause the response period until such information has been received.

11. AUTOMATED DECISION-MAKING

The Charity does not currently undertake automated decision-making or profiling that produces legal or similarly significant effects on individuals.

Should this change, appropriate safeguards required by law shall be implemented.

12. INFORMATION SECURITY

The Charity shall implement appropriate technical and organisational security measures including:

- Password-protected devices.
- Strong password standards.
- Multi-factor authentication where available.
- Access controls.
- Secure cloud storage.
- Secure backup arrangements.
- Anti-virus and anti-malware protection.
- Software updates and patching.
- Secure disposal of records.
- Physical security measures.

Access to personal data shall be restricted to authorised individuals.

13. DATA RETENTION

Personal information shall not be retained longer than necessary.

The following retention periods shall normally apply:

Record Type	Retention Period
Trustee Records	6 years after leaving
Volunteer Records	3 years after leaving
Membership Records	Duration of membership plus 12 months
Donor Records	6 years
Gift Aid Records	6 years after relevant tax year
Financial Records	Minimum 6 years
Supplier Records	6 years after contract end
General Correspondence	3 years

Where legal requirements specify longer retention periods, those requirements shall apply.

14. DATA SHARING

Personal information shall only be shared:

- Where legally required.
- With authorised service providers.
- With professional advisers.
- With insurers.
- With regulators.
- With the consent of the individual.

The Charity shall never sell personal information.

15. DATA PROCESSORS

Where third parties process personal data on behalf of the Charity, the Charity shall:

- Conduct appropriate due diligence.
- Enter into written processing agreements.
- Require suitable security controls.
- Monitor compliance where appropriate.

16. INTERNATIONAL TRANSFERS

Where personal data is transferred outside the United Kingdom, the Charity shall ensure appropriate safeguards are in place, including:

- UK adequacy regulations.
- International Data Transfer Agreements.
- Standard Contractual Clauses where required.

17. PHOTOGRAPHY, FILMING AND PUBLICITY

The lawful basis for photography and filming at public events is Legitimate Interests (Article 6(1)(f) UK GDPR). The Charity has completed a Legitimate Interests Assessment (LIA) confirming that its interests in maintaining a historical record and promoting its charitable activities are not overridden by the rights and freedoms of individuals photographed in a public setting. All LIAs shall be documented and reviewed periodically.

- Historical record purposes.
- Educational purposes.
- Promotional and publicity activities.

Appropriate notices shall be displayed where photography or filming is taking place.

Individuals may request that identifiable images of themselves are not used where reasonably practicable. The Charity may take photographs and video recordings at public events for:

18. WEBSITE, COOKIES AND ELECTRONIC COMMUNICATIONS

The Charity's website shall operate in accordance with applicable privacy and electronic communications legislation, including the Privacy and Electronic Communications Regulations 2003 (PECR) as amended by the Data (Use and Access) Act 2025.

Where cookies or similar tracking technologies are used on the Charity's website:

- Clear, accessible and specific information shall be provided to users about what cookies are set, their purpose, how long they persist, and any third parties that may access them, via a Cookie Notice published on the website.
- Prior, freely given, specific and informed consent shall be obtained before any non-essential cookies (including analytics and marketing cookies) are placed on a user's device. Strictly necessary cookies do not require consent. Consent shall be recorded and shall be as easy to withdraw as to give. Non-compliance with PECR may attract fines of up to £17.5 million or 4% of annual global turnover under the Data (Use and Access) Act 2025.

Electronic marketing communications shall only be sent where permitted by law.

19. DATA BREACHES

Any actual or suspected personal data breach must be reported immediately to the Trustee responsible for data protection.

The Charity shall:

1. Investigate the incident.
2. Assess risks to individuals.
3. Record all breaches.
4. Notify the ICO within 72 hours where legally required.
5. Notify affected individuals where there is a high risk to their rights and freedoms.

A Data Breach Register shall be maintained.

20. DATA PROTECTION COMPLAINTS

Any person may raise concerns regarding the handling of their personal data. In accordance with the Data (Use and Access) Act 2025, the Charity operates a formal data protection complaints procedure as set out below.

Complaints should be submitted through one of the following accessible channels:

By email (electronic channel): enquiries@bangorpier.org

By post: The Secretary, Friends of Bangor Garth Pier, 40 Ffriddoedd, Road Bangor, Gwynedd, LL57 2TW

Email: enquiries@bangorpier.org

The Charity shall:

- Acknowledge receipt of every complaint within 30 calendar days of receiving it, using the same channel through which it was submitted where practicable (Data (Use and Access) Act 2025, s.103).
- Investigate every complaint without undue delay, keeping the complainant informed of progress at reasonable intervals throughout the investigation.
- Communicate the outcome of the investigation in writing (including by email where appropriate), setting out the findings, any action taken, and the complainant's right to escalate the matter to the Information Commissioner's Office (ICO) if they remain dissatisfied.
- Record complaints and outcomes.
- Inform individuals of their right to complain to the ICO.

A Data Protection Complaints Register shall be maintained.

21. RECORDS OF PROCESSING ACTIVITIES

The Charity shall maintain Records of Processing Activities including:

- Categories of personal data.
- Purpose of processing.
- Lawful basis.
- Recipients.
- Retention periods.
- Security measures.

22. RESPONSIBILITY

The Board of Trustees is the Data Controller.

Overall responsibility for compliance rests with the Board.

23. DATA PROTECTION OFFICER

The Charity has assessed its activities and has determined that it is not legally required to appoint a Data Protection Officer.

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.

24. COMPLAINTS TO THE ICO

Individuals have the right to complain to the Information Commissioner's Office.

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Website: <https://www.ico.org.uk>

25. POLICY REVIEW

This policy shall be reviewed:

- Annually, or following substantial operational changes within the Charity
- Following significant legislative change.
- Following a serious data breach.

VERSION CONTROL

Version	Date	Description
1.0	July 2023	Original Policy
2.0	2026	Major UK GDPR Review
2.1	2026	Updated for Data (Use and Access) Act 2025 and current ICO guidance
2.2	June 2026	DUAA 2025 compliance updates: DSAR reasonable/proportionate search standard; complaints procedure updated to s.103 DUAA (30-day acknowledgement, progress updates, outcome communication); photography lawful basis and LIA documented; PECR/cookie requirements expanded; named DP contact added; cover page approval fields completed.

Approved by the Board of Trustees:

Chair of Trustees: Avril Wayte

Signature: Avril Wayte

Date: 16/6/26