**Definitions**

* ***Personal data*** *is information about a person which is identifiable as being about them, stored electronically/on paper, includes images and audio recordings as well as written information.*
* ***Data protection*** *is about how we, as an organisation, ensure we protect the rights and privacy of individuals, and comply with the law, when collecting, storing, using, amending, sharing, or deleting personal data. Overall and final responsibility for data protection lies with the management committee, who are responsible for overseeing activities and ensuring this policy is upheld. All volunteers are responsible for observing this policy, and related procedures, in all areas of their work for the group.*

**POLICY**

1. SPIN’s policy has been written after referring to <https://ico.org.uk/> which is the UK’s independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

Members have a right to:

1. understand what data organisations have about them and how it is being used
2. see that information and get their own copy of it to use however they want
3. correct the information if it is wrong and ask for it to be deleted or limit how it is used
4. complain if they don’t like things an organisation is doing with their data. (SEE SPIN CONCERNS & COMPLAINTS PROCEDURE
5. SPIN needs to keep personal data about its committee, members, volunteers and supporters in order to carry out group activities. Projects require maintaining databases of personal contact information in order to provide referrals, services, donated items
6. SPIN may be required from time to time to provide data about membership and activities in the form of ANONYMISED monitoring and evaluation information to funding bodies
7. SPIN currently has membership in a closed **Facebook Group** whereby members are not required to identify their personal information and can choose what name to use in the group or post anonymously. *Closed means that it is not accessible to the general public or any other organisations*.
8. We will endeavour to keep personal data up-to-date and accurate and keep it securely. Volunteers use antivirus, firewall and VPN to protect information contained in emails. Personal data held on a laptop in the home of the Director is not taken outside.
9. Surveys and polls occasionally will be provided for feedback and not used to make any decisions about individuals. All results are confidential and will be reported in an aggregated and anonymised form. Data such as free text comments may be published externally in an anonymised form, for other purposes such as SPIN funding applications and including promotional activities. Responses will be retained indefinitely for use in producing statistical analysis and insight.

**COLLECTION and STORAGE OF DATA**

We will collect, store and use the minimum amount of data that we need for clear purposes, and will not collect, store or use data we do not need.

Data will be for:

* purposes for which the individual has given explicit consent, or
* purposes that are in our group’s legitimate interests, or
* contracts with the individual whose data it is, or
* to comply with legal obligations, or
* to protect someone’s life

We will collect, store, use, amend, share, destroy or delete personal data only in ways and comply with the UK General Data Protection Regulation (GDPR\*) and other relevant legislation. We will provide individuals with details of the data we have about them when requested and will delete data if requested by the relevant individual, unless we need to keep it for legal reasons. This policy will be reviewed in 2027.

We will endeavour not to have data breaches. In the event of a data breach, we will endeavour to rectify the breach by getting any lost or shared data back. We will evaluate our processes and understand how to avoid it happening again. Serious data breaches which may risk someone’s personal rights or freedoms will be reported to the Information Commissioner’s Office within 72 hours, and to the individual concerned

**\*GENERAL DATA PROTECTION REGULATION 2018**

*updated 2019 with the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations. These laws and regulations align law in the UK closely to GDPR, the primary European regulation on data protection.*