

Hands Together Ludlow (HTL) - Personal Data Processing Policy

1. Need

HTL is a Registered Charity (Reg. No. 1171979). We retain personal data about volunteers and clients (in both electronic and paper formats) to allow us to fulfil our charitable Objects.

2. Basis of processing

We record data about volunteers and clients on the basis of 'consent'. We also hold some statutory data for employees for payroll and staff management purposes.

3. Personal Data we keep

We store sufficient personal information to allow us to meet our charitable Objects. When that use is completed, personal data is only retained for a short time, in case of queries. It is then anonymised so that we can carry out analysis of activity in general terms.

We also keep a limited mailing list for communicating with volunteers and relevant third-party organisations.

We do not pass any personal information to any other organisation without the consent of the individuals involved.

Some sensitive personal data is labelled 'DO NOT TRANSFER TO ANY ELECTRONIC FORMAT' and is kept in locked cabinets.

4. Data controllers and processors

HTL is the *data controller* for this data. We may also, from time to time, use the Google 'Forms' system or other similar means to carry out electronic surveys. Personal data is not retained in this system after the completion of the survey. Staff payroll processing is provided by Shropshire Council as a *data processor*.

5. Your rights and how to exercise them

Under GDPR (2018) you have rights over how your data is accessed and used:

- To be informed of use
- Access to your data as held
- Rectification of errors
- Erasure in full, including 'forgetting'
- Restriction of processing
- Data portability
- Objection to use
- Those regarding profiling and automated decision making

To exercise any of the above rights please contact us on:
gdpr@handstogetherludlow.org.uk

We will deal with your request within one calendar month.

HTL is registered with the Information Commissioner; Reg. No. **ZA562888**