



## **Canalside Community Food** a community supported agriculture scheme

### **Data Protection Policy**

#### **Purpose:**

The purpose of this policy is to ensure that Canalside Community Food manage Personal Data in compliance with the General Data Protection Regulations (GDPR).

#### **Data Protection Principles:**

Canalside Community Food is a 'not for profit' Organisation and, therefore, is not required to register with the Information Commissioners Office.

Canalside Community Food will comply with the GDPR Data Protection principles, as outlined below:

1. Personal data shall be processed fairly and lawfully and transparently in compliance with the regulatory requirements.
2. Personal data shall be obtained for specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Ensure appropriate measures in place to protect against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred away from Canalside Community Food.

#### **Personal Data**

Personal Data is any information relating to an identifiable person who can be directly or indirectly identified by that data.

**Processing Personal Data:**

Canalside Community Food lawfully holds personal data on individuals, including members, workers and associates, with their consent and for the legitimate interests of Canalside Community food.

The personal data is held as a necessary requirement for the effective functioning of this community Organisation.

**Sensitive Personal Data:**

Sensitive Personal Data relates to information such as gender, race, religion, sexual orientation, criminal convictions and medical information. There may be occasions where Canalside Community Food needs to process sensitive personal information; this will only be completed with the consent of the data subject and for the legitimate interests of the effective and safe functioning of the scheme.

**Photographs:**

As would be reasonably expected of a community membership scheme, photographs will be taken for internal and external publicity purposes. Photographs will only be taken, on behalf of Canalside Community Food, with the knowledge of the subjects photographed. Canalside will only use a first name against a subject's image, unless explicit consent is given to using a full name. No photographs of children will be taken without the consent of their accompanying adult.

Any individual, at any time, can request that they do not appear in a photograph, that a photograph is not used, or that no name is linked to the photograph.

**Individual Rights:**

GDPR provides that any person that Canalside Community Food holds data on has a number of explicit rights.

These include:

- The right to be informed
- The right of access
- The right of rectification
- The right to erasure
- The right to restrict processing

**Data Access:**

Any data subject can make a request relating to their personal data by putting their request in writing to the Data Protection Controller (as determined by the Canalside Steering Group), via the Canalside Administration. Canalside will respond to any such requests as soon as reasonably practicable, and in any case within one calendar month.

**Accuracy of Data**

Canalside Community Food will endeavour to ensure that all personal data held is accurate. Data subjects must notify Canalside of any changes to their personal Data to ensure that data records are kept as accurate as possible.

## **Privacy notice**

Where personal data is being initially collected, or used for a further purpose, then data subjects will be informed through a privacy notice how Canalside will use their personal data. A copy of the privacy notice can be found at Appendix 1.

## **Security of Data**

Canalside Community Food manages the data required for the effective functioning of the scheme both physically and online.

An information asset register and risk assessment is completed and subject to review to ensure that effective and proportionate security measures are in place to adequately protect all the personal data held, and to minimise the risk of a data breach. Any future activity relating to data will be designed to protect data by default.

## **Retention of Data**

Personal data will be held for no longer than is necessary for Canalside Community Food to function effectively and to meet the legal and statutory obligations placed upon it.

## **Destruction of Data**

All personal data held by Canalside is subject of regular review and will be destroyed when the requirement to hold it is no longer fulfilled. The data will be destroyed in a secure manner.

## **Data Breach**

In the event of an identified or suspected breach of personal Data held by Canalside Community food, either accidental or unlawful, the response plan detailed at Appendix 2 of this policy will be followed.

The primary objective following a data breach will be to minimise any potential impact to individuals as a result.

## **Responsibility**

Canalside is a community based not for profit organisation. It is the responsibility of everyone connected to Canalside to respect and protect the personal data and privacy of others.

## **Additional Information:**

Futher detailed information, guidance and advice on all aspects of data protection can be found on the on the Information Commissioners Office website: [www.ico.org.uk](http://www.ico.org.uk)

Any queries concerning this policy should be addressed to the Canalside Steering Group.

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Owned and approved by Canalside Community Steering Group on: 18<sup>th</sup> April 2018

To take effect from: 25<sup>th</sup> May 2018

**TO BE REVIEWED: 1<sup>st</sup> June 2019**

## Appendix 1 - PRIVACY NOTICE

### Your information:

- At Canalside Community Food we take your data privacy seriously.
- We only hold the personal data that you have provided to us, with your consent, and as a necessary requirement for the effective functioning of our Community Organisation. This will include your name and address and contact information, as well as, where appropriate, your payment information. We will not collect any personal data from you that we do not need.
- We do not share your information with any third parties or use your information for any purpose other than that required for the running of Canalside Community Food.
- Any personal information that you have provided to us is retained securely and only accessible to those members of the Canalside Steering Group that require it to discharge their responsibilities.
- We have a Data Protection regime in place, underpinned by a Data Protection Policy. The policy includes how we manage publicity photographs. A copy of the policy is available on the website and in the 'Policies' folder in the collection space at the farm.
- We will retain your personal information for the minimum period required by UK Law, after which your information will be securely destroyed.

### Your rights:

- If at any point you believe your information being held by Canalside is incorrect or you wish to see the information, have it deleted or amended or have any queries, concerns or complaints about your data please do not hesitate to get in touch with Canalside Community Food administrator at [mail@canalsidecommunityfood.org.uk](mailto:mail@canalsidecommunityfood.org.uk) and the matter will be investigated.
- As a 'not for profit' organisation Canalside Community Food is not required to register with the Information Commissioners Office. However, if you are not satisfied with our response to a complaint or believe we are not acting in accordance with the law you can complain to the Information Commissioners Office.

## **Appendix 2 - GDPR INCIDENT RESPONSE PLAN**

This plan is to be followed in the event of a suspected Data Breach.

### **Step 1.**

Data incident is suspected, identified, detected and reported to a member of the Canalside Steering Group.

### **Step 2.**

Analyse the preliminary information received.

If the report was a false alarm make a record of the report.

If the incident involves personal data move to step 3

### **Step 3.**

Inform the Canalside administrator and consult the ICO [ico.org.uk](http://ico.org.uk) for guidance on how to assess the severity of the breach. If the breach fits the following definition move to step 4:

“A personal data breach may, if not addressed in an appropriate and timely manner, result in physical, material or non-material damage to natural persons such as loss of control over their personal data or limitation of their rights, discrimination, identity theft or fraud, financial loss, unauthorised reversal of pseudonymisation, damage to reputation, loss of confidentiality of personal data protected by professional secrecy or any other significant economic or social disadvantage to the natural person concerned.”

### **Step 4.**

Inform the ICO within 72 hours of becoming aware of the incident.

### **Step 5.**

Inform the data subjects about the data breach.

### **Step 6.**

Take all possible steps to mitigate the risk.

### **Step 7.**

Fully record the incident.