



Warwickshire Pride

Registered Charity Number: 1162449

General Data Protection Regulation (GDPR) Policy

The General Data Protection Regulation (GDPR) comes in to force on the 25th May 2018.

This document is our policy which clearly outlines how we as a Charitable Incorporated Organisation (CIO) will comply with this piece of legislation. It also provides valuable information to individuals on their rights and how to contact us.

Why we need to hold data and the type of data we may hold

Warwickshire Pride (from here on referred to as The CIO) holds personal data related to individuals who access support services run by The CIO. The personal data of individuals who apply for trustee or volunteer positions at The CIO is also held. In addition, The CIO also holds data related to individuals and businesses involved with the Warwickshire Pride festival, and occasionally receives data relating to a purchase of The CIO's merchandise. Personal data may be any of the following: *“information related to a natural person or ‘Data Subject’, that can be used to directly or indirectly identify the person. It can be anything from a name, a photo, an email address, bank details, posts on social networking websites, medical information, or a computer IP address”*.

Our data controller, data processors and their roles

The CIO's Data Controller is: **Daniel Browne**. The Data Controller determines the purposes, conditions and means of the processing of personal data, while authorised Data Processors process personal data on behalf of the controller. The CIO's Data Processors (persons who may have access to or use personal information in respect of their lawful activities) include:

- **Trustees of The CIO**
- **Volunteers at The CIO**

Our legal responsibilities in respect of data

1. Under this legislation The CIO is required to obtain clear consent to use sensitive personal data, and must provide an opportunity for consent to be withdrawn. The opportunity to provide consent is provided in the following ways:

- **via the tick box when submitting an online form from The CIO's website**

- **via email confirmation upon The CIO asking individuals and businesses for their consent**
2. The opportunity to withdraw consent is provided in the following ways:
 - **by notifying the Data Controller in writing that you wish to withdraw your consent**
 3. Parental consent is required to process the personal data of children under the age of 16 accessing services. However, The CIO is currently choosing not to adhere to this clause due to the sensitive nature of the support services. By obtaining parental consent, a young person could be outed as LGBT+. This could potentially put the young person at risk.
 4. Data breaches which may pose a risk to individuals must be notified to the DPA within 72 hours and to affected individuals without undue delay. The CIO undertakes to notify individuals of any data breach within 7 days.
 5. Individuals have the right to obtain confirmation from the Data Controller as to whether or not personal data concerning them is being processed, where and for what purpose. In addition, the Data Controller is required to provide a copy of the personal data, free of charge, in an electronic format.

All requests should be addressed to:

**The Data Controller
Warwickshire Pride
80 Spinney Hill
Warwick
Warwickshire
CV34 5SP**

or

info@warwickshirepride.co.uk

If The CIO holds information about you, the Data Controller will:

- **give you a description of the information held**
- **tell you why we are holding the information**
- **tell you whom the information could be disclosed to**
- **give you an accurate copy of the information The CIO holds**

6. You have the '**right to be forgotten**' which gives you the right to have the Data Controller erase your personal data, cease further dissemination of the data, and potentially have third parties halt processing of the data. **It is The CIO's policy not to sell or pass your data to third parties. All data stays within The CIO.**

7. You have the right to receive personal data concerning you in a commonly used electronic format. We can provide your information in:
 - **PDF format**

8. Under this legislation the Data Controller will only hold and process only the data absolutely necessary for the completion of their duties (data minimisation), as well as limiting the access to personal data to only those needing it for essential processing activities in pursuance of The CIO's lawful activities. The use of your personal data is restricted to the following activities:
 - **to contact you regarding your access to a support service run by The CIO**
 - **to contact you regarding your volunteer or trustee role at The CIO**
 - **to contact you regarding your participation in the Warwickshire Pride festival**
 - **to fulfil orders for products**
 - **to process invoices and receipts**
 - **to address or respond to any correspondence or complaint**

By giving us your personal data and consenting, you agree to accept the terms of this policy.

All questions relating to The General Data Protection Regulation should be addressed to the Data Controller using the contact information provided above.

Last reviewed: May 2018

Next review due: May 2021