

Date created: April 2019

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Whitchurch Silk Mill Trust (WSMT) is fully committed to all aspects of data protection as a means of ensuring the highest standards of information collection and application in the interests of our charitable objectives, visitors and community users, clients, donors, staff, volunteers and other stakeholders. It applies to all staff and volunteers who process data for any purpose.

WSMT is committed to the principles inherent in the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) and particularly to the concepts of privacy by design, the right to be forgotten, consent and a risk-based approach. In addition, we aim to ensure:

- transparency with regard to the use of data
- that any processing is lawful, fair, transparent and necessary for a specific purpose
- that data is accurate, kept up to date and removed when no longer necessary
- that data is kept safely and securely.

In addition to complying with the GDPR, WSMT is committed to complying with the Privacy and Electronic Communications (EC Directive) Regulations 2003 (PECR) which relate to marketing by telephone, fax, email and text message.

WSMT needs to collect and use personal data about people with whom it works in order to operate efficiently and improve services. As such it will maintain appropriate registration with the Information Commissioner (who maintains a public register of Data Controllers).

Regardless of how it is collected, recorded and used, all such personal information will be handled and dealt with in accordance with the principles set out in GDPR.

WSMT will aim to ensure that all employees and volunteers with access to personal data are aware of their responsibilities under GDPR will provide training and support.

Responsibility for compliance rests with the Board of Trustees, and accountability for operational implementation is delegated to the Mill Director as the appointed data protection person. She works with data processors and the Mill Team to promote awareness of the GDPR throughout the Mill and to oversee the Mill's commitment to best practice. She will inform and advise the organisation and monitor its compliance.

Our data protection policy is available on our website and a copy has been made available to all employees and to contractors and suppliers associated with the Mill. It forms part of the induction

training of all the Mill Team and follow-up sessions will be put in place if the legislation changes or further guidance is available.

Right to be forgotten: WSMT recognises the right to erasure, also known as the right to be forgotten, laid down in the GDPR. Individuals should contact the Mill Director with requests for the deletion or removal of personal data. These will be acted on provided there is no compelling reason for continued processing and that the exemptions set out in the GDPR do not apply. These exemptions include where the personal data is processed for the exercise or defence of legal claims and to comply with a legal obligation for the performance of a public interest task or exercise of official authority.

Subject access requests: WSMT recognises that individuals have the right to access their personal data and supplementary information and will comply with the one-month timeframe for responses set down in the GDPR. As a general rule, a copy of the requested information will be provided free of charge although WSMT reserves the right to charge a "reasonable fee" when a request is manifestly unfounded or excessive, particularly if it is repetitive. If this proves necessary, the person concerned will be informed of their right to contest our decision with the supervisory authority (the Information Commissioner's Office (ICO)).

As set out in the GDPR, any fee will be notified in advance and will be based on the administrative cost of providing the information.

Privacy: WSMT will implement data protection "by design and by default", as required by the GDPR. Safeguards will be built into products and services from the earliest stage of development and privacy-friendly default settings will be the norm. The privacy notice, which is on our website and which is provided to anyone from whom we collect data, explains our lawful basis for processing the data and gives the data retention periods. It makes clear that individuals have a right to complain to the ICO.

WSMT has conducted a privacy impact assessment (PIA) to ensure that privacy risks have been properly considered and addressed and any project which involves the use of personal data, or to any other activity which could have an impact on the privacy of individuals will be assessed.

Data transfers outside the EU: WSMT does not transfer personal data outside the EU.

Children: The GDPR provides for special protection for children's personal data and WSMT will comply with the requirement to obtain parental or guardian consent for any data processing activity involving anyone under the age of 16. Systems have been introduced to verify individuals' ages.

Data loss: If a data breach occurs that is likely to result in a risk to the rights and freedoms of individuals, the people affected will be informed as soon as possible and the ICO will be notified within 72 hours.

GDPR contact: Any questions related to GDPR or to issues concerning data protection generally should initially be addressed to Sue Tapliss, Mill Director sue.tapliss@whitchurchsilkmill.org.uk.