



## The Black Horse Community Group Limited (the “Society”) Data Protection Policy

### 1. Definitions

- a. Personal data is information about a person which is identifiable as being about them. It can be stored electronically or on paper, and includes images and audio recordings as well as written information.
- b. 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, destroying or deleting personal data.

### 2. Responsibility

- a. Overall and final responsibility for data protection lies with the management committee, who are responsible for overseeing activities and ensuring this policy is upheld.
- b. All employees and volunteers are responsible for observing this policy, and related procedures, in all areas of their work for the Society.

### 3. Overall policy statement

- a. The Society needs to keep personal data about its committee, members, employees, volunteers, supporters and suppliers in order to carry out Society activities.
- b. The Society will collect, store, use, amend, share, destroy or delete personal data only in ways which protect people’s privacy and comply with the General Data Protection Regulation (GDPR) and other relevant legislation.
- c. The Society will only 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.
- d. The Society will only collect, store and use data for:
  - purposes for which the individual has given explicit consent, or
  - purposes that are in the Society’s legitimate interests, or
  - contracts with the individual whose data it is, or
  - to comply with legal obligations, or to protect someone’s life, or
  - to perform public tasks.
- e. The Society will provide individuals with details of the data we have about them when requested by the relevant individual.
- f. The Society will delete data if requested by the relevant individual, unless we need to keep it for legal reasons.
- g. The Society will endeavour to keep personal data up-to-date and accurate.
- h. The Society will store personal data securely.
- i. The Society will keep clear records of the purposes of collecting and holding specific data, to ensure it is only used for these purposes.
- j. The Society will not share personal data with third parties without the explicit consent of the relevant individual, unless legally required to do so.
- k. The Society 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. The Society will evaluate its 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.
- l. To uphold this policy, the Society will maintain a set of data protection procedures for our committee and volunteers to follow.

### 4. Review

Originally adopted 26 May 2021. This policy will be reviewed regularly, at least every two years

This policy was reviewed and approved by the Management Committee on 19 February 2025.



## The Black Horse Community Group Limited (the “Society”) Data protection procedures

### 1. Introduction

- a. The Society has a data protection policy which is reviewed regularly. In order to help it uphold the policy, the Society have created the following procedures which outline ways in which it collects, stores, uses, amends, shares, destroys and deletes personal data.
- b. These procedures cover the main, regular ways the Society collect and use personal data. The Society may from time to time collect and use data in ways not covered here. In such cases the Society will ensure its Data Protection Policy is upheld.
- c. Having consulted the Information Commissioner’s Office (ICO) website, the Society do not have to register as it meets the exemptions as only holding information to maintain membership and support, and any profits are for the Society’s own purpose and not to enrich others.

### 2. General procedures

- a. Data will be stored securely. When stored electronically, it will be kept in password protected files. When stored online with a third-party (e.g BOX) the Society will ensure the third-party complies with the GDPR.
- b. When the Society no longer needs data, or when someone has asked for their data to be deleted, it will be deleted securely. The Society will ensure that data is permanently deleted from computers, and that paper data is shredded and/or burned.
- c. The Society will keep records of consent to collect, use and store data. These records will be stored securely.

### 3. Mailing list

- a. The Society will maintain a mailing list of members which will include names and contact details as required by legislation.
- b. The Society will not maintain a mailing list of individuals who are not members.
- c. The Society will not use a mailing list in any way that individuals on it have not explicitly consented to and will not provide the list to third-parties unless legally required to.
- d. Individuals will cease to be on the mailing list when they cease to be a member but their details will be retained as a previous member as required.

### 4. Contacting volunteers

- a. People volunteer for the Society in a number of ways and the Society may maintain contact details of volunteers used within the last 12 months.
- b. The Society may share volunteering opportunities with those on the volunteer list and this may necessitate sharing contact details with other volunteers.

### 5. Contacting committee members

- a. The committee need to be in contact with one another in order to run the organisation effectively and ensure its legal obligations are met. Therefore, Committee contact details will be shared among the committee.
- b. Committee members will not share each other’s contact details with anyone outside of the committee without explicit consent from committee members this applies to.

### 6. Review

Originally adopted 26 May 2021. These procedures will be reviewed regularly, at least every two years

These procedures were reviewed and approved by the Management Committee on 19 February 2025