

Policy #8

Data Privacy (DP)

CGPS – A Policy for ensuring the Privacy and Management of Data

Contents

1	Our contact details	2
2	The type of personal information we collect.....	2
3	How we get the personal information and why we have it	2
5	How we store your personal information.....	3
6	Your data protection rights.....	3
7	How to complain	4
8	Cookies Policy.....	5
	What is a cookie?.....	5
	How do we use cookies?	5

Version	Date	Notes
V0.1	19/01/21	Initial Draft for review
V0.2	26/01/21	All Points from H Andrews email added to clarify assurances (Type of data, receipt of data, storage of data and data protection rights)
V0.3	05/07/21	Upgrade for new CGPS Website Development with Sericum Designs including Section 8 – Cookies Policy

This policy does not constitute legal advice or attempt to cover all situations that our Society may require. This policy is a starting point to develop policies that cover our precise needs and situation. The policy is based upon our best interpretation of current guidance that has been provided by a range of sources – including the **ICO Information Commissioner's Office**.

Charity Reg. # 1192171

Capel Greenbelt Protection Society is a Charitable Incorporated Organisation (CIO) registered with the Charities Commission and HMRC in England & Wales,

Member of the London Green Belt Council (LGBC)



1 Our contact details

Name: The Trustees
Address: CGPS
Phone Number: 07493 777 187
E-mail: cgps2021@gmail.com
Website: www.capelgb.com

2 The type of personal information we collect

We currently collect and process the following information:

1. Personal identifiers (Name)
2. Contacts (email address, phone number)
3. Financial Details; (if necessary, derived from purchases, donations etc.)
 - o bank account and payment card details,
 - o details about payments to and from an individual

3 How we get the personal information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

1. When you Log your interest
2. So that we can Provide Newsletters
3. So that we can Send you information
4. When we Accept and Process Donations from you

We also use website cookies to track the use of our website, See cookie information below.

We do not intend to share this information with any third parties. If we do – we will tell you. For instance: the HSBC bank (CGPS account), the Charities Commission and also HMRC if you are a gift aid donor

Under the [General Data Protection Regulation \(GDPR\)](#), the lawful basis we rely on for processing this information is :

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- (a) Your consent. You are able to remove your consent at any time. You can do this by contacting:

cgps2021@gmail.com

unless

- (b) We may have a legal obligation.
(c) We need it to perform a public task (Gift Aid).
(d) We have a legitimate interest.

5 How we store your personal information

Your information is stored securely and confidentially on a private computer. We also use external service providers which have their own data protection policies. These sites store lists of names and email addresses for us eg Mailchimp and Gmail.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to the Trustees and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so

We keep your personal information provided for 6 years after the date of when we cease our relationship with you. We will then dispose of your information by deleting your data completely unless we are obliged to keep it by the authorities e.g. HMRC. .

6 Your data protection rights

Under data protection law, you have rights including:

- (a) **Your right of access** – You have the right to ask us for copies of your personal information.

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- (b) **Your right to rectification** – You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- (c) **Your right to erasure** – You have the right to ask us to erase your personal information in certain circumstances.
- (d) **Your right to restriction of processing** – You have the right to ask us to restrict the processing of your personal information in certain circumstances.
- (e) **Your right to object to processing** – You have the right to object to the processing of your personal information in certain circumstances.
- (f) **Your right to data portability** – You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive whereupon we may refuse to comply with your request

If you make a request, we have one month to respond to you.

Please contact us at cgps2021@gmail.com if you wish to make such a request.

7 How to complain

If you have a complaint regarding how we have managed your personal information, [or you feel your data has been breached](#), you can make a complaint to us at cgps2021@gmail.com.

We have a Complaints Policy which you may have access to.

You can also complain to the ICO if you are unhappy with how we have managed your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>

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8 Cookies Policy

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly.

What is a cookie?

A "cookie" is a piece of information that is stored on your computer's hard drive and which records how you move your way around a website so that, when you revisit that website, it can present tailored options based on the information stored about your last visit.

Cookies are used by nearly all websites and do not harm your system. If you want to check or change what types of cookies you accept, this can usually be altered within your browser settings. You can block cookies at any time by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

How do we use cookies?

We use cookies to track your use of our website. This enables us to understand how you use the site and track any patterns with regards how you are using our website. This helps us to develop and improve our website.

Cookies are either:

- *Session cookies*: these are only stored on your computer during your web session and are automatically deleted when you close your browser – they usually store an anonymous session ID allowing you to browse a website without having to log in to each page, but they do not collect any personal data from your computer; or
- *Persistent cookies*: a persistent cookie is stored as a file on your computer and it remains there when you close your web browser. The cookie can be read by the website that created it when you visit that website again. We use persistent cookies for Google Analytics.

Cookies can also be categorised as follows:

- *Strictly necessary cookies*: These cookies are essential to enable you to use the website effectively, and therefore these cannot be turned off. Without these cookies, the services available to you on our website cannot be provided. These cookies do not gather information about you that could be used for marketing or remembering where you have been on the internet.

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- *Performance cookies:* These cookies enable us to monitor and improve the performance of our website. For example, they allow us to count visits, identify traffic sources and see which parts of the site are most popular.

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