



Data Protection Policy

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Definitions

Charity	means Dyspraxic Me, a registered charity.
GDPR	means the General Data Protection Regulation.
Responsible Person	means Jessica Starns.
Register of Systems	means a register of all systems or contexts in which personal data is processed by the Charity.

1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step

must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

2. General provisions

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity’s ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. According to Information Commissioner’s Office (ICO) advice the charity does not need to register but will monitor in case guidance changes

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Charity shall note the appropriate lawful basis in the Register of Systems.

- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

5. Data minimisation

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. Volunteers personal data and emergency contact details to be kept up to date by completing a full review annually.

7. Data we collect

- a. The charity keeps service users email addresses.
- b. The charity keeps volunteer contact details and emergency contact details.

8. How data is stored

- a. Emails are stored in Dyspraxic Me password protected Mailchimp account. Access to the account is restricted to only the most relevant trustees and volunteers.
- b. Emails are also stored in Dyspraxic Me password protected Eventbrite account for the specific meetings service users have signed up for. Access to the account is restricted to only the most relevant trustees and volunteers.

9. Sharing data

- a. Data will not be shared with any third party unless legally obliged to do so
- b. Volunteer contact details might need to be shared between volunteers in order for them to carry out the volunteer role.

- c. Volunteer contact details including emergency contact details will be stored in a password protected document.

9. Data used

- a. The charity uses service users data to contact them via email about upcoming meetings and other relevant information.
- b. The charity stores volunteer contact details to contact volunteers regarding their volunteer role. Permission will be sought from volunteers where this is the case.

10. Archiving / removal

- a. Service users can unsubscribe to emails/newsletter by doing so on the Mailchimp unsubscribe link on the footer of the newsletter.
- b. The charity will keep volunteer contact details for a maximum of 3 years after leaving their role.

11. Security

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

12. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY