

LAMPS COLLECTIVE

Data Protection and Privacy Policy (including GDPR)



Data Controller: LAMPS Collective
Charity No. 1162692

Data Protection Lead: Alison Winder

Date of Policy update: 28 February 2019

This is the **Data Protection and Privacy Policy** for **LAMPS Collective**. It covers how we will process (use and store) your data, what data we hold, your individual rights and how you can interact with us about your data. As with all policy statements, it is a bit wordy but don't let this put you off and, if you need to, you are welcome to get in touch with our Data Protection Lead (see below). We are here to help!

This policy covers our use of **personal data**, which is any information about a living individual which allows them to be identified from that data (for example a name, photographs, videos, email address, or address). This may be you! Identification can be by the information alone or in conjunction with any other information.

Our **processing of personal data** is governed by the Data Protection Act 2018 and the General Data Protection Regulation 2016/679 (the 'GDPR' and other legislation relating to personal data and rights such as the Human Rights Act 1998].

Who are we?

This Privacy Notice is provided to you by **LAMPS Collective, Charity No. 1162692** which is the **Data Controller** for your data. LAMPS Collective has appointed a number of responsible people for the control and processing of personal data that we hold. These post-holders have been trained in GDPR requirements and a list of the individuals can be provided on request. For clarity, the term Data Controller covers all employed staff members, office holders, volunteers and trustees of LAMPS Collective.

So, how is your data used and processed?

LAMPS Collective processes data containing:

- names, titles, and aliases, photographs;
- contact information including telephone numbers, postal/residential addresses, and email addresses.

Where there is a **legitimate interest** to facilitate our charitable aims and activities, or where you have provided them to us, we may process demographic information such as gender, age, date of birth, education and work histories.

Where you give financially in support of LAMPS Collective, we may process financial identifiers such as bank account numbers.

As a Data Controller, all our appointed persons will comply with their legal obligations to keep personal data up to date; to store and destroy it securely; to not collect or retain excessive amounts of data; to keep personal data secure, and to protect personal data from loss, misuse, unauthorised access and disclosure and to ensure that appropriate technical measures are in place to protect personal data. If you have any concerns about how your data is being used, please speak with our **Data Protection Lead: Alison Winder**

What are we doing with your data?

We only hold data that either we are legally obliged to, or that helps us fulfil our missional and charitable aims. We are a non-profit organisation and good communication with our supporters is an essential part of our activities.

Therefore, we will hold and process data to:

- enable us to meet all legal and statutory obligations
- deliver our mission and carry out any other voluntary or charitable activities for the benefit of the public as provided for in the constitution and statutory framework of our charitable organisation;
- administer our records of supporters and donors;
- fundraise and promote the interests of LAMPS Collective;
- maintain our Accounts and records;
- process and record financial donations that you have made (including Gift Aid information);
- communicate with you about your views or comments;
- update you about any changes to our services, events, role holders and any matters of interest to you because of their relationship to the work of LAMPS Collective;
- send you communications which you have requested and that may be of interest to you. These may include information about events, performances, campaigns, appeals and other fundraising activities;
- process a grant;
- process an application for an employed or voluntary role;
- enable us to provide a voluntary service for the benefit of the public in a particular geographical area as specified in our constitution;

What is our legal basis for processing your personal data?

Most of our data is processed because it is necessary for our legitimate interests to enable our charitable and missional aims. For example, maintaining records of supporters of LAMPS Collective, recording financial donations.

Some of our processing is necessary for compliance with a legal obligation; Gift Aid declarations are an example of this.

We may also process data if it is necessary for the performance of a contract with you, or to provide a service to you.

Where your information is used other than in accordance with one of these legal bases, we will first obtain your consent to that use.

Will we share your data?

You can be reassured that we will treat your personal data as strictly confidential. It will only be shared with third parties where it is necessary to fulfil a legal obligation, for the performance of our tasks or where you first give us your prior consent. It is likely that we will need to share your data with any commercial provider we might use to send out newsletters on our behalf.

How long will we keep your personal data?

Our general rule is to keep data no longer than necessary. Where you continue to actively engage with us, we will retain the appropriate data for you so that we can best serve your involvement. We operate an annual process of review through which we assess who is continuing to actively engage in LAMPS Collective's work and where this is not the case we will remove your data.

Additionally:

- we will keep some records permanently if we are legally required to do so.
- we may keep some other records for an extended period of time. For example, it is a current HMRC requirement to keep financial records for a minimum of 7 years.

What are your rights with respect to your personal data?

You have the following rights with respect to your personal data. When exercising any of these rights, in order to process your request, we may need to verify your identity for your security. In such cases we will need you to respond with proof of your identity before we can process your request:

- **The right to access information we hold on you.** At any point you can contact us to request the information we hold on you as well as why we have that information; who has access to the information and from where we obtained the information. Once we have received your request we will respond within one month. There are no fees or charges for such requests.
- **The right to correct and update the information we hold on you.** If the data we hold on you is out of date, incomplete or incorrect, you can inform us and your data will be updated.
- **The right to have your information erased.** If you feel that we should no longer be using your data or that we are illegally using your data, you can request that we erase the data we hold. When we receive your request, we will confirm whether the data has been deleted or any reason why it cannot be deleted, for example, because we need it for our legitimate interests or regulatory purposes.
- **The right to object to processing of your data.** You have the right to request that we stop processing your data. Upon receiving the request, we will contact you and let you know if we are able to comply or if we have legitimate grounds to continue to process your data. Even after you exercise your right to object, we may continue to hold your data to comply with your other rights or to bring or defend legal claims.

- **The right to data portability.** You have the right to request that we transfer some of your data to another controller. We will comply with your request, where it is feasible to do so, within one month of receiving your request.
- **The right to withdraw your consent to the processing at any time for any processing of data to which consent was sought.** You can withdraw your consent easily by telephone, email, or by post (see Contact Details below).
- The right to lodge a complaint with the Information Commissioner's Office. You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Transfer of Data Abroad

Our website is accessible worldwide so on occasion some personal data, for example in a newsletter, may be accessed from overseas. However, it is our practice not to publish any personal data on our website, in our newsletters or via social media without your consent or in any way that might jeopardise your safety or security.

Further processing

If we wish to use your personal data for a new purpose, not covered by this Privacy Policy notice, we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

You are very welcome to get in contact with us...

If you have any queries or concerns about how we use your data, please do get in contact with us.

Our **Data Protection Lead** is Alison Winder. She can be contacted at:

Address: LAMPS Collective, c/o 36 Welford Gardens, Abingdon, OX14 2BW
 Email: Data@LampsCollective.com

Original Policy approved by the LAMPS Collective Board 4 May 2018

Reviewed & approved by the LAMPS Collective Board of Trustees 28 February 2019

Renamed Data Protection and Privacy Policy (including GDPR) and approved by LAMPS Collective Board of Trustees 13 July 2020