The Friends of the Parish Church of St. Mary's Old Basing
Registered Charity Number 1051202

DATA PROTECTION POLICY

Reviewed: 7th September 2026

1. Purpose

This Policy sets out how The Friends of the Parish Church of St. Mary's Old Basing Registered Charity 1051202 (the Charity) collects, uses, stores, and protects personal data in accordance with UK data protection law, including the UK GDPR, the Data Protection Act 2018, and the Data (Use and Access) Act 2025.

2. Scope

This Policy applies to all Members of the Executive Committee (Trustees), volunteers, and anyone handling personal data on behalf of the Charity.

3. Personal Data Collected, Held, and Processed

The Charity only collects and processes the following personal data:

- Names of members of the Charity and 50:50 club
- Trustee date of birth, NI and ID document numbers
- Names of supporters and volunteers
- Postal addresses
- Email addresses
- Telephone numbers
- Records of donations and subscriptions

The Charity does not collect or store special category (sensitive) personal data.

4. Lawful Basis for Processing

The Charity processes personal data under the following lawful bases:

- Legitimate interests – to manage membership, maintain contact with supporters and volunteers, and support the administration and activities of the Charity, including promoting and running Charity related events.
- Legal obligation – to maintain accurate financial records (e.g. donations and Gift Aid where applicable)

The Charity ensures that any reliance on legitimate interests is reasonable, proportionate, and does not override individuals' rights.

5. How Personal Data is Used

The Charity uses personal data to:

- Communicate with members, supporters and volunteers
- Administer trustees, memberships and subscriptions
- Record and acknowledge donations
- Maintain financial records
- Provide updates about Charity activities
- Facilitate organisation of Charity activities

The Charity does **not** sell or pass on personal data to third parties, or use it for unrelated marketing.

All reasonable steps will be taken by the Charity to ensure that personal data is kept accurate and up-to-date, and is processed in a manner that ensures appropriate security.

6. Consent

Consent is not needed for processing personal data under legal obligation.
For data processing and communications under 'legitimate interests', opt-in consent is not required under the Data Act 2025, provided that:

- Contact details are obtained directly for the person, not via another organisation.
- The opt-in consent is only used to further our Charity purposes, and not used to promote other organisations, including other charities.
- Supporters and volunteers can opt-out of communications when their contact details are initially collected, and have a chance to opt-out in every subsequent message sent.

7. Data Storage and Security

- Personal data is stored securely:
    - Systems and Apps are covered by two-factor authentication
    - Mobile devices must require a passcode, fingerprint, or facial recognition to unlock
    - Files protected with strong passwords
    - Where possible ensure the data is encrypted (standard on most modern smartphones and operating systems)
    - Back-up data using secure, reputable cloud services
    - Anti-virus and threat protection kept up-to-date on all devices
    - Hard copies stored in locked filing cabinets

- Keep contact data separate from personal contacts
- Access is limited to Trustees and other authorised volunteers who need to have access

8. Data Retention

Please refer to the Charity's Data Retention Policy which also includes a Data Retention Schedule listing each data type with a description, retention period and lawful basis for processing.

9. Data Sharing

The Charity does not share personal data with third parties except:

- Where required by law (e.g. HMRC for Gift Aid)
- With trusted service providers where necessary and secure

10. Individual Rights

Under UK data protection law, individuals have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request deletion (where appropriate)
- Object to processing
- Withdraw consent (where applicable)

The Charity will respond to requests in accordance with updated guidance on handling data subject requests, ensuring requests are handled proportionately and within required timeframes.

11. Data Breaches

Any data breach will be:

- Recorded and assessed
- Reported to the Information Commissioner's Office (ICO) if required
- Addressed promptly to minimise risk

12. Responsibilities

The Trustees are responsible for ensuring compliance with this Policy and applicable data protection legislation, including registration with the ICO and payment of the annual fee. Trustees and any other volunteers with access to personal data shall be made fully aware of their responsibilities under this Policy.

For data protection queries, contact: Chair of the Executive Committee
friendsofstmarysbasing@gmail.com

13. Review of Policy

This Policy will be reviewed annually by the Executive Committee to ensure it remains fair, transparent, and consistent with legal and regulatory requirements. Any amendments must be approved by the Executive Committee and communicated to relevant stakeholders.

This Policy has been approved and authorised by the Executive Committee on 11th June 2026 and last reviewed on 7th September 2026

Name: Matthew Jarrett
Position: Chair of the Executive Committee

Date: 7th September 2026

Signature: 