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

DATA RETENTION POLICY

Reviewed: 7th September 2026

1. Purpose

This Policy sets out how long The Friends of the Parish Church of St. Mary's Old Basing Registered Charity 1051202 (the Charity) retains personal data and how it is securely deleted or destroyed when no longer required.

2. Scope

This Policy applies to all personal data held by the Charity in both electronic and paper form, and to all Members of the Executive Committee (Trustees) and volunteers handling that data. The Charity does not collect or store special category (sensitive) personal data.

3. Principles

The Charity follows these principles:

- Personal data is kept only as long as necessary
- Retention periods reflect legal, accounting, and operational needs
- Data is securely deleted or destroyed when no longer required
- Retention practices are proportionate to the size and nature of the Charity

4. Data Retention Schedule

Data Type	Description	Maximum Retention Period or Criteria	Legal Basis / Reason	Action after Retention
Membership Records	Names, addresses, email, phone	Four years from the last payment of a membership subscription	Legitimate interests	Delete or anonymise
Trustee Records	Contact details, date of birth, NI and ID doc numbers	Five years from resignation as trustee	Legal and operational	Securely delete
Donation records	Financial transaction history	Six years plus current financial year	Accounting and tax compliance	Delete or anonymise

Continued:

Data Type	Description	Maximum Retention Period or Criteria	Legal Basis / Reason	Action after Retention
Gift aid declarations	Donor tax declarations	Six years plus current financial year after last claim	Required by HMRC	Securely delete
Volunteer and supporter records	Contact details, involvement history	Four years from the date of the last activity	Legitimate interests	Securely delete
50:50 club members	Names, addresses, email, phone	Four years from the last payment of a 50:50 club subscription	To collect subscriptions and pay out prizes	Securely delete
Email, other correspondence	General communications	Up to four years	Operational / legitimate interests	Securely delete

Retention periods may be extended where required by law or for legitimate organisational needs (e.g. ongoing disputes).

5. Lawful Basis for Retention

The Charity retains personal data under:

- Legal obligation (e.g. financial and HMRC requirements)
- Legitimate interests (e.g. maintaining contact with supporters, administration)

Where relying on legitimate interests, the Charity ensures retention is reasonable, proportionate, and does not override individuals' rights.

6. Data Review

- Personal data is reviewed at least annually in April
- Records no longer required are identified for deletion
- Outdated or inaccurate data is corrected or removed

7. Individual Rights

Individuals may request:

- Deletion of their personal data
- Restriction of processing

Requests will be considered in line with legal obligations and retention requirements.

8. Secure Deletion and Disposal

Upon the expiry of the data retention periods or when an individual asks for their data to be removed as set out in Parts 4 and 7 of this Policy:

- **Electronic data** is permanently deleted from systems and backups where feasible
- **Paper records** are shredded or securely destroyed
- Care is taken to ensure data cannot be reconstructed

9. Data Minimisation

The Charity only retains the minimum amount of personal data necessary to fulfil its purposes and obligations.

10. Data Breaches

Any breaches involving retained data will be handled in accordance with our Data Protection Policy and reported to the Information Commissioner's Office where required.

11. Responsibilities

Trustees are responsible for:

- Ensuring compliance with this Policy
- Periodically reviewing retained data
- Ensuring secure disposal practices

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

12. 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:

