

# Tarland Development Group Data Protection Policy

## Introduction

1. The GDPR (General Data Protection Regulation 2016/679) requires Tarland Development Group (TDG) to safely and responsibly manage all the personal data that it holds. TDG holds a very limited amount of personal data on its Members and on people who have contacted or have worked with the Group. This allows the Group to:
  - a. Operate according to its charitable aims as set out in its Constitution;
  - b. Provide Members with updates as required (e.g. dates of meetings and copies of the Annual Report etc.); and
  - c. React efficiently to any requests made to it.

All the data processing is carried out as part of one of the following lawful actions:

- Consent;
- Contract;
- Legal obligation;
- Public task; or
- Legitimate interests.

The Group will never contact any individuals on an unsolicited basis.

2. TDG is committed to protecting all personal data it holds in line with its responsibilities under GDPR and, in particular, to ensuring that any processing of data by the Group is lawful, fair and transparent. The Secretary is the Group's nominated person responsible for ensuring TDG's compliance with GDPR.
3. TDG, as a Charity, is exempt from registering as an organisation that processes personal data with the Information Commissioner's Office (ICO).

## Data and Data Processing

4. All the Members' information held by the Group has already been and will continue to be acquired with their permission. The Group will ensure that personal data is adequate, relevant and limited to only what is necessary in relation to the purposes for which the data is processed or retained. TDG will take reasonable steps to ensure that personal data is accurate and is kept up to date. TDG will also ensure that personal data is not kept for any longer than necessary.
5. Anyone has the right to access their personal data or to ask for their data to be removed from TDG records. Anyone wishing to do this should contact TDG as soon as possible (tarlanddevelopmentgroup@gmail.com) and the Group will comply with their request as quickly as possible.

## Security

6. The Group will ensure that any personal data is stored securely and will have appropriate back-up systems in place. Access to personal data will be limited to personnel who require access, who will not share the data without a justified reason.

7. When personal data is deleted this will be done such that the data is irrecoverable. TDG will destroy any obsolete computer equipment securely to ensure that any historic data is not accessible.

### Breaches and Investigations

8. The Trustees will investigate any breach of data security (accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data held by TDG). The resulting report and the actions identified will be reviewed at the next Trustees meeting. The Chair will be responsible for ensuring that any actions are completed (including if necessary reporting the incident to the ICO).

### Review

9. This policy will be reviewed annually and updated as required.

GH/KD – 5<sup>th</sup> November 2018