

**THE SAM & BELLA SEBBA CHARITABLE TRUST
DATA PROTECTION POLICY**

SBSCT believes that protecting the privacy of our staff, volunteers, grantees and the persons supported by grantees, within the framework of UK law is essential. SBSCT takes responsibility for ensuring that any data that we collect and process is used correctly and only as is necessary.

1. Our promise

In line with the Data Protection Act 1998, and ICO's 8 principles of good practice when processing data, the SBSCT will:

- ensure that data is fairly and lawfully processed;
- process data only for limited purposes;
- ensure that all data processed is adequate, relevant and not excessive;
- ensure that data processed is accurate and, where necessary, kept up to date;
- not keep data longer than is necessary;
- process the data in accordance with the data subject's rights;
- ensure that data is secure;
- ensure that data is not transferred to other countries without adequate protection.

There may be circumstances where the Trust is required, either by law or in the best interests of our staff, volunteers, grantees and the persons supported by grantees, to pass information onto external authorities, e.g. Charity Commission, HMRC. These authorities are up to date with data protection law and have their own policies relating to the protection of any data that they receive or collect. Under no circumstances will the SBSCT disclose information or data that would cause serious harm to the physical or mental health of anyone.

2. Requesting data

The above identified have a right under the Data Protection Act to request information that the Trust has collected about them by any data controller and can request in writing to see what data is held.

3. Location of information and data

Data, records, and personal information are stored in the Trust's office and on computer files. As best the Trust knows, it does not hold sensitive or personal information and data on any of the above named categories except for information required by the Charity Commission.

- Paper copies of data or personal information should not be taken from the Trust office.
- If information is being viewed on a PC, staff must ensure that the window and documents are properly shut down before leaving the computer unattended.
- If it is necessary to transport data away from the office, it should be downloaded onto a USB stick. The data should not be transferred from this stick onto any home or public computers. Work should be edited from the USB, and saved onto the USB only.
- USB sticks which staff use must be password-protected.

These guidelines are clearly communicated to all staff, and any person who is found to be intentionally breaching this conduct will be disciplined in line with the seriousness of their misconduct.

4. Retention of data

The Trust will not keep personal data any longer than is necessary.

Approved

On behalf of the SBSCT

Date _____

On behalf of the Trustees
The Sam and Bella Sebba Charitable Trust

Date _____

Last updated
November 2017