



Data Protection Policy

LLMF Wales

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Definitions

Charity	LLMF Wales, a registered charity.
GDPR	General Data Protection Regulation.
Responsible Person	Chairperson LLMF Wales
Friends	Supporters of LLMF Wales who donate on a regular basis
Trustees	Chairperson, Secretary, Treasurer and other LLMF Wales Executive committee members

1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR. Article 5 of the GDPR requires that personal data shall be:

- a. "processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed; and
- f. used in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures."

2. General provisions

- a. This policy applies to all personal data as defined by the Information Commissioner's Office and held by LLMF.
- b. The Responsible Person shall take responsibility for LLMF's ongoing compliance with this policy.
- c. This policy shall be reviewed biennially and at such time that new legislation or guidance becomes available.
- d. This policy will be held electronically by LLMF's Secretary.
- e. LLMF is not required to register with ICO as it falls into the exemption criteria due to the restricted level and type of information held.

3. Lawful, fair and transparent processing

- a. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.
- b. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
- c. Consent to hold data is set out in LLMF's Privacy Statement, accessible from the website.

4. Data minimisation

- a. LLMF shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are used.
- b. All data and information held by LLMF is kept electronically and is password protected. Any temporary paper records that might be produced, e.g. for meetings, will be safely destroyed after use.
- c. Only data and information voluntarily provided by individuals or organisations is recorded and stored by LLMF.
- d. The data and information will be used to maintain a financial record of donations and purchases, as well as a list of Friends and Trustees of LLMF. It will also be used, with prior permission of individuals to share news and photographs of events and fundraising achievements.
- e. This information will be only accessible by LLMF Trustees and not shared with a third party unless legally obliged to do so.

5. Accuracy

- a. LLMF shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, LLMF will take reasonable steps to ensure that personal data is kept up to date.
- c. Trustees will raise irregularities or concerns for immediate resolution.

6. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, LLMF shall put in place an archiving process for each area in which personal data is processed and review this process annually.
- b. The archiving process shall consider which data should be retained, for how long, and why. This will be done annually when LLMF contacts Friends to update information.

7. Security

- a. LLMF shall ensure that personal data is stored securely using modern software that is kept-up-to-date and is password protected.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up security solutions shall be in place for all information held by Trustees. All electronically - held information is backed up on a daily basis.

8. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, LLMF shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO.

END OF POLICY