Policy 7

General Data Protection Regulations (GDPR)

Privacy Notice and

Data Protection Policy

For

Wenlo

Riding for the Disabled Group

Address: Bowleys Barn Farm, Stanford Road, Normanton-on-Soar
Leicestershire, LE12 5ER

Registered Charity No: 1191961

Revision
Data Protection – details of principles removed and replaced by reference to myrda.org.uk

PRIVACY NOTICE

What Information Do We Collect About You?

We collect information about you when you complete relevant forms for us, including the rider/driver application form and the volunteer application form.

How Will We Use the Information About You?

We will use the information about you to administer the RDA group ride schedules. We may pass the information about you to Riding for the Disabled Association incorporating Carriage Driving, the national body. Limited, anonymised information may be passed to RDA for analysis in the Tracker. We will not disclose any information about you to any company other than noted above, or if required to do so by law.

Marketing

We would like to send you newsletters and other information about how you can support the RDA group. If you have consented to receive marketing, you may opt out at a later date. You have a right at any time to stop us from contacting you for marketing purposes.

Access To Your Information and Correction

You have the right to request a copy of the information that we hold about you.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate.

Retention Of Data

Once you are no longer involved with the RDA group, we will securely retain your data for 3 years for adults and 3 years after a child reaches the age of 18.

DATA PROTECTION POLICY

Purpose And Background

The RDA Group holds information about riders, volunteers and other people involved with our activities. The Group has a responsibility to look after this information properly, and to comply with the EU General Data Protection Regulation (GDPR). It is likely that the GDPR will continue to form the basis of

our Data Protection legislation, even once the UK has left the EU, so it is fully taken into account in this policy.

Good Data Protection practice is not just a matter of legal compliance and ticking the boxes. Data Protection is about taking care of people and respecting their privacy. Poor practice or a serious breach could not only harm individuals but would also have a serious effect on the reputation of our group and RDA as a whole.

Scope

This policy applies to information relating to identifiable individuals which is held by Wenlo RDA

Our Legal Basis for Using People's Data

Everything we do with records about individuals – obtaining the information, storing it, using it, sharing it, even deleting it – will have an acceptable legal basis. There are six of these:

- Consent from the individual (or someone authorised to consent on their behalf)
- Where it is *necessary* in connection with a contract between our group and the individual.
- Where it is *necessary* because of a legal obligation – if the law says you must, you must.
- Where it is *necessary* in an emergency, to protect an individual's 'vital interests'.
- Where it involves the exercise of a public function – i.e., most activities of most government, local government and other public bodies.
- Where it is *necessary* in our legitimate interests, as long as these are not outweighed by the interests of the individual.

Where we are basing our processing on consent we will be able to 'demonstrate' that we hold consent. This means having a record of who gave consent, when they gave it, how they gave it (e.g. on the website, on a form, verbally) and what they actually consented to.

In the case of legitimate interests we will do a balancing test, and be confident that our legitimate interests in using the data in a particular way – for example

in providing our services or raising funds to support them – are not over-ridden by the interests of the individual.

There are additional considerations where we are holding information about people's racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, and also genetic data or biometric data, health data or data concerning their sex life or sexual orientation. We will legitimise the use of any of these categories of data by having the individual's *explicit* consent.

Data Protection Principles

Data Protection compliance is based largely on a set of Principles.

The six GDPR Principles say that:

- Whatever you do with people's information has to be fair and legal. This includes making sure that they know what you are doing with the information about them.
- When you obtain information you must be clear why you are obtaining it, and must then use it only for the original purpose(s).
- You must hold the right information for your purposes: it must be adequate, relevant and limited to what is necessary.
- Your information must be accurate and, where necessary, up to date.
- You must not hold information longer than necessary.
- You must have appropriate security to prevent your information being lost, damaged, or getting into the wrong hands.

Further details on each of these principles can be found at https://myrda.org.uk/runningyourgroup/policies/ under 'Data Protection'.

Responsibilities

Responsibility for compliance with Data Protection lies with the organisation, not with any specific individual. The Trustees as a whole body will be responsible to keep up to date with any developments, to check that we are complying and have the evidence to prove it, to give advice to staff and volunteers and to handle any issues such as a data breach or a Subject Access Request. The Trustees may designate someone to be the lead person.

We will notify RDA National Office in the event of a serious issue eg a data breach.

When we work in collaboration with other organisations we will sort out clearly (and in writing) who is responsible for what, in order that there are no Data Protection gaps.

If we engage external suppliers to handle data for us in any way, our contract will set out their responsibilities to handle data in a way that will not cause us to be in breach.